

designated market area (DMA)), and offers public affairs and entertainment programming in that and nine other Asian languages.

In the Notice the Commission states correctly that the multiple benefits of the DTV transition “are dependent upon widespread consumer understanding of the benefits and mechanics of the transition.”² Achieving that understanding requires that the FCC consumer education initiative be conducted in at least the most-spoken Asian languages in America, in addition to English and Spanish. Major segments of the Asian-language audience are especially vulnerable to losing all television access on the transition date of February 17, 2009. There are four main reasons why this is so, and why the Commission’s DTV consumer education initiative must be conducted in major Asian languages in order to succeed:

1. The Asian-American audience is large and growing. From 2000 to 2004 total Asian population in the U.S. grew from 11.9 to 14 million.³ Nielsen Media Research estimates the number of Asian TV households to be 4.5 million on January 1, 2008.⁴ In the San Francisco DMA Asian TV homes are nearly 21 per cent of total TV households. In the San Francisco, New York, Los Angeles, Honolulu and Chicago DMAs, home to 48% of total U.S. Asian TV households, Asian-language programming is mainstream.⁵

² Notice, p. 2.

³ 2004 U. S. Census Bureau Community Survey.

⁴ Nielsen Local Television Market Universe Estimates, Asian TV Households, effective September 22, 2007.

⁵ See Attachment B hereto.

2. Reliance on native language is significant in several major Asian-language communities. In the San Francisco DMA more than 930,000 people -- about 70% of the Asian-American community -- speak at least one Asian language; according to the 2000 Census more than 209,000 of those, or 22.5%, spoke English either "not at all" or "not well."⁶ More recently, in 2006, the U.S. Census Bureau found that 304,000 Asian-language speakers in the San Francisco-Oakland-Fremont Metropolitan Statistical Area spoke English less than "very well." That is nearly half -- 49.3% -- of all Asian-language-speakers in that measurement area, which is smaller than the DMA.⁷ Language groups having the lowest levels of multilingualism in the market include Chinese, Vietnamese and Korean. In-language information is essential to these viewers' awareness of the transition and its mechanics, including but not limited to the existence and timing of the transition and the NTIA converter box coupon program.

3. In several Asian-language audiences (in San Francisco, Chinese, Vietnamese and Korean), reliance on over-the-air television reception is much higher than in the general population. In the San Francisco DMA overall, 11 per cent of viewers subscribe to neither cable nor satellite TV. In the Chinese community that rate of non-subscribership is more than twice as high, at about

⁶ U.S. Census Bureau, Census 2000, Demographic Information for the San Francisco-Oakland-San Jose Consolidated Metropolitan Statistical Area, http://factfinder.census.gov/servlet/QTTTable?_bm=y&-context=qt&-qr_name=DEC_2000_SF3_U_QTP17&-ds_name=DEC_2000_SF3_U&-CONTEXT=qt&-tree_id=403&-all_geo_types=N&-geo_id=38000US7362&-search_results=01000US&-format=&-lang=en.

⁷ U.S. Census Bureau, 2006 American Community Survey, http://factfinder.census.gov/servlet/ADPTable?_bm=y&-geo_id=31000US41860&-context=adp&-ds_name=ACS_2006_EST_G00_&-tree_id=306&-lang=en&-caller=geoselect&-format.

28 percent.⁸

4. The least multilingual Asian audiences are the most dependent on over-the-air reception. In the San Francisco DMA about 87% of the Chinese audience that lacks cable or satellite speak Mandarin or Cantonese at home, and only 9 per cent speak English there.⁹

For these reasons, which are amplified and supported in Attachments A and B hereto, Lincoln urges the Commission to include Asian-language consumer education as part of its own initiative, devote a portion of its budget to it and support and facilitate Asian-language DTV consumer education by other participants in the transition.

Respectfully submitted,

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Attachments:

A: Lincoln Broadcasting Comments of Sept. 25, 2006 in NTIA Docket 060512129--6129-01 ("Administration of Coupon Program for Digital to Analog Converter Boxes").

B: KTSF-Prepared Asian American Audience Fact Sheet, September, 2007.

⁸ KTSF 2006 Consumer Study, cited in Attachment B, Chart 2.

⁹ KTSF 2006 Consumer Study, cited in Attachment B.