



David K. Rehr, Ph.D.

President & CEO

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December 28, 2007

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *In the Matter of DTV Consumer Education Initiative,*
MB Docket No. 07-148

Dear Chairman Martin:

NAB respectfully submits for the Commission's consideration the attached form for reporting on broadcaster efforts for digital television (DTV) consumer education. This form will help provide the accountability that you and others have called for as we all move forward toward the change to all digital broadcasting on February 17, 2009.

As you and I discussed last week, broadcasters are fully committed to ensuring no consumer is left behind due to a lack of information about the upcoming transition. Towards this end, NAB has been working closely with broadcasters and others to devise an effective program with full accountability for educating the public. The broadcaster plan, as announced in October, is based on our extensive marketing experience, and is specifically designed to be effective and adaptable. All the networks are participating in the plan which calls for on-air announcements, including during prime time hours. As we have continued to refine and improve the plan, we now estimate that we will generate public awareness of the DTV transition in the form of over 132 billion impressions.

We are asking the Commission to consider broadcasters who participate in the plan we have developed to be in compliance with any requirement to provide on-air education about the transition. We intend to visit each of the Commissioners to more fully explain our safe-harbor proposal.

The Honorable Kevin J. Martin

December 28, 2007

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Again, thank you for your outstanding leadership on this matter.

Best wishes.

Sincerely,

A handwritten signature in black ink that reads "David K. Rehr". The signature is written in a cursive style with a large, prominent 'D' and 'R'.

David K. Rehr

cc: Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell

Enclosures

DTV Quarterly Activity Station Report

Instructions

This form should be used to provide the Federal Communications Commission (FCC) with information pertaining to all station activity to educate consumers on the transition to digital television (DTV). All stations should log DTV spots and other DTV activities using the appropriate house (identification) numbers. These logs or records should include the date and time that each DTV activity occurred.

Stations should run a minimum of 144 DTV spots per quarter. Comment boxes included in this form may be used to describe those spots. In the event of extenuating circumstances where the station was unable to meet this minimum requirement, the comment box may also be used for an explanation.

Report reflects information for quarter ending (mm/dd/yy)

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<u>Call Sign</u>	Channel Numbers	Community of License									
	Analog _____ Digital _____	City	State	County	Zip Code						
Licensee											
<input type="checkbox"/> Network Affiliation: _____ <input type="checkbox"/> Independent		Nielsen DMA	World Wide Web Home Page Address								
Facility ID Number	Previous Call Sign (if applicable)	License Renewal Expiration Date (mm/dd/yy)									
		<table border="1" style="width: 100%; height: 25px;"> <tr> <td style="width: 15%;"></td> </tr> </table>									

Simulcasting

Are you simulcasting on your Analog and your Digital channels?

Yes No

If **NO** you are not simulcasting, then complete a form for both your Digital and your Analog channels.

Total Number of DTV Action Spots Run -- Last Quarter

How many DTV action spots did your station run between 5:00 a.m. and 1:00 a.m. last quarter?

Total 5:00 a.m. to 1:00 a.m. DTV Action Spots

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How many DTV action spots did your station run in the last quarter from 5:00 a.m. to 6:00 p.m.?

Total 5:00 a.m. to 6:00 p.m. Action Spots

How many DTV action spots did your station run in the last quarter from 6:00 p.m. to 1:00 a.m.?

Total 6:00 p.m. to 1:00 a.m. Action Spots

Crawls, Snipes and News Tickers – Last Quarter

Did your station run any crawls, snipes or news tickers during the quarter? The comment box may be used to describe this activity.

Yes

No

Comments:

30 Minute Educational Programs – Last Quarter

How many 30 minute, DTV related educational programs did your station run during the quarter? The comment box may be used to describe this activity.

Total number of 30 Minute Educational Programs

Comments:

Additional DTV On-air Initiatives – Last Quarter

Did your station run additional on-air initiatives (such as news reports, town hall meetings, etc.) during the quarter? The comment box may be used to describe these initiatives.

Yes

No

Comments:

Station Web Site Activity Related to the DTV Transition – Last Quarter

Does your station have a Web site? Yes No

If YES, your station does have a Web site, did your station run DTV related activity on that Web site?
The comment box may be used to describe what was posted on the station’s Web site.

Yes No

Comments:

Additional DTV Outreach Efforts -- Last Quarter

Check all of the DTV related activities listed below that your station engaged in over the last quarter.
The comment box may be used to describe this activity.

Speaking Engagements

Comments:

Community Events

Comments:

Additional activities not listed here

Comments:

Beginning on November 10, 2008, all stations participating in the DTV plan will engage in special 100-Day “Countdown to DTV” activities.

Has your station engaged in “**Countdown to DTV**” activities during the last quarter? The comment box may be used to describe this activity.

Yes No

Comments:

This comment box may be used to include other comments or information about your station's DTV activity over the last quarter.

Comments:

This comment box may be used to describe any special circumstances that prevented your station from meeting its anticipated DTV goals over the last quarter.

Comments:

STATION CERTIFICATION

I certify that the statements in this document are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name of Licensee (print):

Signature:

Date:



Great ready for the switch to digital television.

Comprehensive DTV Consumer Education Campaign

DTVAnswers.com

An initiative of the National Association of Broadcasters.

Overview

The National Association of Broadcasters (NAB), in a coordinated effort between local television stations across the country and their network partners, have put forth an unprecedented consumer education marketing effort to reach television viewers with information about the February 17, 2009 transition from analog to digital television (DTV).

Ensuring that all viewers are prepared when the federally-mandated switch to digital-only broadcasting occurs is a top priority of all television broadcasters, networks and the premiere advocacy organization that represents them in Washington, D.C. – the National Association of Broadcasters.

Consumers have much to gain with the transition to digital television, including crystal clear pictures and sound and a variety of new services, ranging from additional free broadcast channels to advanced data services. But millions of households that rely on free, over-the-air broadcast signals risk losing television reception unless they take steps to upgrade.

Since late 2006, efforts to educate consumers have been underway, spearheaded by an NAB team dedicated solely to digital transition education. In the second phase of this critical effort, broadcasters and networks are unveiling a multi-platform, multifaceted marketing effort to complement the variety of other initiatives dedicated to educating consumers about the nation's switch to digital broadcasting.

With the immense amount of activity broadcasters and their network partners are undertaking to educate consumers on the transition, NAB engaged Starcom MediaVest Group as a strategic partner to help construct the plan and quantify the reach of these initiatives. Starcom MediaVest Group is the largest media services organization in the country, responsible for more than \$16

billion in media spending annually. Using their proprietary, state of the art software program – Tardiis – Starcom MediaVest Group was able to calculate approximate impressions and valuations of the consumer education campaign. Given the immense differences between communities across the country, it is imperative that broadcasters utilize a number of different tools to educate their viewers about the transition to digital. A one-size-fits-all approach to consumer education can not efficiently educate viewers whose composite differs from market to market. No one knows how to reach television viewers about their viewing experience better than their local broadcasters. This education initiative is an important part of broadcasters' ongoing commitment to their viewers and their communities.



Starcom MediaVest™
GROUP

October 15, 2007

David K. Rehr, Ph.D.
President and CEO
National Association of Broadcasters
1771 N Street, NW
Washington, DC 20036

Dear David:

On behalf of Starcom MediaVest Group, I'd like to thank the National Association of Broadcasters for trusting us with the important task of counseling the NAB on the best approach for informing and educating the U.S. television viewing public of the impending switch from analog to digital television.

Starcom MediaVest Group is the largest media services organization in the country, responsible for more than \$16 billion in media spending annually. We are honored to serve some of the largest and most dynamic marketers in the country, including General Motors, Procter & Gamble, Coca-Cola and Kraft, just to name a few.

Given the rapidly changing media landscape, smart marketers today rely on multi-communications platforms for reaching their target audiences. Sophisticated marketers realize that consumers are increasingly elusive, and relying solely on one medium is rarely sufficient for delivering their messages. This modern philosophy goes by many names, including "holistic planning", "channel planning", or any number of industry terms. But the driving principle is consistent: it is important to engage consumers across numerous media elements in order to effectively communicate a message.

The multi-platform marketing plan that the NAB has developed with the help of Starcom to communicate this important initiative embraces the principles of multi-channel communications. It utilizes the broadcasters' commercial inventory, along with their digital assets. It includes place-based and outdoor media. It utilizes grassroots elements at the local level. It also includes significant public relations efforts that will deliver considerable coverage in newspapers, on television and radio and online. There will also be numerous word-of-mouth and "viral" efforts that will spread the message throughout the community.

On behalf of Starcom MediaVest Group, I fully endorse the multifaceted approach being taken by NAB.

Best regards,

A handwritten signature in black ink that reads "Renetta E. McCann". The signature is fluid and cursive, with a long horizontal stroke at the end.

Renetta McCann
Global CEO
Starcom MediaVest Group

Executive Summary

Background

As mandated by the Deficit Reduction Act of 2005, all full-power television stations must cease analog transmissions on February 17, 2009 and begin transmitting in a digital-only format.

In preparation for this transition, the National Association of Broadcasters (NAB) has developed a comprehensive communications and education campaign. The purpose of this campaign is to alert the U.S. television viewing public of the impending shift and to inform them of the measures they need to take in order to ensure that they will be prepared to receive television broadcasts once the transition takes place.

Currently, there are 19.6 million U.S. households that receive over-the-air, broadcast-only signals, equating to 17 percent of total U.S. households. There are, on average, 2.27 TVs in these households, or approximately 45 million televisions. In addition, there are an estimated 24 million broadcast-only televisions in households that also have cable/satellite/internet connections. In total, nearly 69 million televisions would be affected.

The NAB has engaged Starcom MediaVest Group (SMG) as counsel in the development of this marketing campaign. Starcom MediaVest Group is the largest media services organization in the United States, representing dynamic advertisers such as General Motors, Procter & Gamble and Coca-Cola in the development of their strategic marketing programs.

Plan Overview

SMG, along with the NAB, has developed a dynamic, multi-channel communication plan that will reach virtually every American adult with sufficient frequency to alert and educate them of the impending transition to digital

television. The plan fully leverages all of the assets of the participating stations, including commercial inventory, online resources, community events, talent and outdoor advertising. A soft-launch of the campaign is underway, with encouraging results. While NAB and many broadcasters have already begun valuable education efforts, the next phase of this comprehensive plan began in earnest October 2007.

NAB has made a significant investment in staff, having hired a five-person, full-time staff dedicated exclusively to DTV transition consumer education. The staff has already utilized outside experts to conduct significant consumer research, in the form of surveys and focus groups to find out as much as possible about the universe of American over-the-air, broadcast-only viewers. NAB has also visited and opened dialogues with officials running respective DTV campaigns in the United Kingdom, Sweden, Austria and Belgium to ascertain how European nations are running their transition campaigns. NAB's plan is based upon solid consumer understanding, demographic and viewership knowledge and the experience of other global nations.

NAB has developed and is supporting *www.DTVanswers.com*, a comprehensive Web site, which is a resource to educate consumers, journalists and opinion leaders about the DTV transition. The Web site address will be included in all communications materials. In addition, for those constituents who prefer telephone contact, there is a government sponsored (800) number phone line resource for information as well.

NAB has engaged SMG, along with several other leading communications firms, to aid in the development of their plan. In addition, NAB is working with specialists in media planning and buying, public relations and event marketing to develop programs that will surround the TV viewing public with informative communications, many of which will be hands-on in nature.

Executive Summary

NAB has already developed communications materials, including:

- DTV Action Spots in English and Spanish
- Video packages for stations' news departments, including B-roll footage and other graphic elements that can be used to develop and edit stories regarding the digital transition
- Toolkits for federal and state policy makers, complete with presentations and Web banners
- Brochures and collateral materials that have been distributed through coalition partners and at trade shows

The above materials are being produced and delivered to all of NAB's 1,169 member television stations. In addition, NAB made these materials available to non-member commercial and non-commercial stations as well. NAB will also produce 30-minute educational programs for local stations.

In order to seed the campaign message, SMG has instructed NAB to recommend to its member stations and networks a comprehensive program of DTV Action Spots, air time and other on-air features. The program is based upon a combination of running quarterly DTV Action Spots and airing of the 30-minute educational programs and informational messages through crawls, snipes, news tickers and other impactful features, such as a 100-day "count down" program to be included in all local news broadcasts.

Word-of-mouth and other techniques that can spread the word "virally" are critical for the success of educational campaigns. NAB has developed a program of grassroots initiatives that will provide community-level activities to drive the message home. NAB has already recruited a 700-person speaker's bureau for an anticipated 8,000 speaking engagements at venues all across

the nation, including local chambers of commerce, senior centers and civic clubs. Two customized tour trucks, designed to look like televisions on wheels, will be crisscrossing the country, stopping at more than 600 local events in over 200 markets. Hands-on education and instruction regarding digital converters will be conducted at these events.

In addition, NAB has formed a coalition with more than 170 organizations, such as AARP and National Council of La Raza (NCLR), to help get the word out regarding the digital transition. Each of these organizations has agreed to utilize their existing communications materials to communicate the news of the transition to their membership. Additionally, NAB's DTV team has been teaming with coalition partners to exhibit and distribute information at their annual conferences and trade shows.

These types of grassroots efforts will be extremely important to provide further context to the transition message and will enhance the understanding of the DTV Action Spot television campaign. SMG endorses these efforts, recognizing that they will provide incremental activities to some of the disproportionately affected groups: senior citizens, minority populations, lower-income constituents and rural populations.

Media coverage of the transition story, in addition to coverage of many of the grassroots components, is anticipated to be significant. This transition affects many Americans and is duly newsworthy. NAB has a full-time media relations staff member whose sole purpose is to make sure that the DTV transition is being covered both accurately and ubiquitously by America's reporters. NAB has briefed reporters from major news organizations and plans to facilitate reporter briefings in all 50 states. With the aid of NAB's public relations agency, Crosby Volmer International Communications, NAB will push local news "hooks" into

Executive Summary

stories in major metro areas, suburban areas and in the heartland. We anticipate significant news coverage across local television, radio and newspapers, as well as their Web sites.

As the media marketplace continues to evolve to meet consumer needs, the member stations of NAB have developed significant assets beyond just their commercial inventory. The members have significant online assets that they can bring to bear for this program. In addition, some members also have significant outdoor advertising assets that will be utilized to communicate the transition message.

SMG has proposed that a combination of streaming and display advertising be donated on the stations' Web sites to support the transition campaign. Significant exposures are anticipated from this component of the campaign, extending the overall reach of the message.

Finally, paid media will be utilized to supplement activities in key markets where public awareness of the transition lags. Advertisements in newspapers, at public transportation hubs and at key retailers have been recommended in these areas.

Plan Delivery

NAB's plan will drive the message of the DTV transition across numerous consumer media touchpoints. By engaging consumers via television, in the news media, online, through outdoor efforts and in direct, grassroots events, the message will be seeded and communicated much more effectively than through television advertising alone.

SMG has quantified and estimated the overall delivery of this campaign utilizing the agency's industry-leading tools. SMG projects that virtually the entire U.S. adult population will be exposed to these messages.

It is the opinion of Starcom MediaVest Group that this is a dynamic, multi-channel communications program that will be effective in communicating the digital transition to the U.S. population.

DTV Consumer Campaign Overview With 100% Station Commitment

Television Elements	Impressions (18+)	Reach	Average Frequency	Approximate Value
DTV Action Spots	30,073,407,000	91.9%	151.6	\$604,810,300
Crawls, Snipes and/or Newstickers	9,580,262,000	72.5%	61.2	\$35,016,200
30-Minute Educational Programs	192,412,000	12.7%	7	\$4,191,700
100-Day News Countdown	88,749,728,000	83.5%	492.5	\$350,272,700
Newspaper Coverage	1,768,727,000	58.3%	14.1	\$2,651,600
Online Newspaper Coverage	486,697,000	13.7%	16.4	\$1,062,400
DTV Road Show	1,780,598,000	42.9%	19.2	\$7,321,800
DTV Speakers Bureau	1,000,000	1%	1	\$2,000,000
Banner Ads on Station Web sites	225,542,000	11.2%	9.3	\$457,700
TOTAL	132,858,372,000	95.8%	642.7	\$1,007,784,300
Public Television Commitment			+	\$50,000,000
TOTAL COMMITMENT = \$1,057,784,300				

About Tardiis: Tardiis is a state-of-the-art television optimizer exclusively developed for Starcom MediaVest Group. It harnesses the power of viewing at the program level to provide optimized schedules for individual brands, as well as allocating programs across multiple products. The reach-based, multi-brand optimization and corporate allocation include inventory management and the ability to routinely include qualitative as well as quantitative variables.

Additional Efforts

Despite the comprehensive nature of this multi-platform campaign, the value of this effort is a very conservative estimate, given that many elements that will be utilized to reach consumers were not included in the impression and value quantification. The value of this multifaceted television campaign does not even take into account the broad reach of other platforms that television broadcasters will utilize to reach all consumers with information about the transition to digital television.

Local News Coverage

Not included in the campaign valuations is the invaluable reach of local news programming. Local television news teams throughout the country will be covering the transition to digital as part of their consumer awareness efforts.

Utilizing Content

Broadcasters will be working with their network and syndication partners to include messages about the digital transition in story lines and content of popular television shows.

Radio

Radio broadcasters will also join the effort to educate America's consumers about the transition to digital television. NAB will supply stations with DTV Action Spots, as well as scripts for live talent reads. NAB is also providing stations with Web banners and information about the easy steps viewers can take to upgrade to digital.

College broadcasters

Broadcasters will be working with their counterparts at college television and radio stations to ensure messages about the mandatory upgrade to digital reaches all audiences.

Outdoor Media

NAB will harness the power of outdoor media by working closely with CBS, Clear Channel and other outdoor media providers to reach consumers with information about the transition and drive them to www.dtvanswers.com for additional information.

Addendum of Definitions

Campaign Elements

DTV Action Spots: A combination of 10, 15 and 30 second spots running across all dayparts in network, local station and syndication programming encouraging television viewers to take action to prepare for the transition to digital television. Available in English and Spanish.

Crawls, snipes and/or newstickers: DTV messages running across programming on local stations across non-prime dayparts.

30-Minute Educational Programs: NAB-produced educational program on preparing for the DTV transition. Available in English and Spanish to run by stations in selected dayparts.

100-Day Countdown: Local station graphic and/or mention in various news and other programs reminding viewers of the number of days left until the switch to digital on February 17, 2009. *(To begin 100 days prior to the switch.)*

Newspaper print and online coverage: NAB's DTV transition team includes a media relations director and a public relations firm identifying and working with print reporters across the country to promote the DTV transition. Estimates based on newspaper circulation, Web site analytics and CPM estimates.

Road Show "Trekker": NAB's two giant televisions on wheels that will tour the country visiting 600 locations in 200 markets from November 2007 through the transition date. Trekker staff will be on hand to distribute information about the switch to digital television.

Speakers Bureau: NAB's comprehensive speakers bureau, made up of volunteers from the broadcast industry (station management, on-air talent and others) committed to giving presentations to local civic groups and others interesting in learning about the DTV transition. Impressions based

on target of 8,000 speaking engagements nationwide expected to reach one million consumers.

Online Banner Ads: NAB has made available online Web banner ads to direct visitors to the comprehensive site – www.dtvanswers.com – to prepare for the transition to digital. Estimates based on Web analytics and exposure on local station sites.

Measurement Terms ¹

Gross Impressions: The number of times an advertising schedule is seen over time. The number of gross impressions may exceed the size of the population since audience members may be duplicated.

Reach: The number of unduplicated persons or households included in the audience of a station or a commercial campaign over some specified period. Sometimes expressed as a percentage of the market population.

Frequency: In advertising, the average number of times that an individual is exposed to a particular advertising message.

¹ Webster, James G., Phalen, Patricia F. & Lichty, Lawrence W. (2000). Ratings Analysis: The Theory and Practice of Audience Research (2nd ed.) Mahwah, NJ: Lawrence Erlbaum Associates.