Comment of Focus on the Family in response to Public Notice for Comments released February 26, 2019, DA 19-120, MB Docket No. 19-41, “Media Bureau seeks comment on TV Ratings System and the oversight monitoring board.”

[Focus on the Family](https://www.focusonthefamily.com/) operates a publication and website known as Plugged In that is designed to shine a light on the world of popular entertainment while giving families the essential tools they need to understand, navigate, and impact the culture in which they live. <https://www.pluggedin.com/>

***Plugged In* Thoughts on the Current FCC TV Ratings Conversation**

We've been asked to comment upon whether the “current code is being applied accurately” or not when it comes to TV ratings.

This seems like, frankly, a nearly impossible question to answer, given that the code (in our understanding) is one in which *the networks themselves* determine what would be appropriate for what age group. (For instance, when *The Walking Dead* first aired on AMC, the show was rated TV-14, despite it setting new standards for unremitting gore on television.) It’s impossible to determine whether the code is being applied “accurately” when each network can largely determine for itself what ratings should be given. To say that this is a self-serving system would be a generous assessment, as it's a system that arguably incentivizes content creators to provide as lenient a rating as possible.

The TV ratings system does have a “monitoring board,” made up largely of in-industry representatives, but with some outside representation, too. (The American Academy of Pediatrics and the Boys and Girls Clubs of America, for instance, are represented.) But the board meets, according to *tvguidelines.org*, “annually or more often, if necessary, to consider and review complaints sent to the Board, discuss current research and review any other relevant issues.” This is *not* a board, obviously, that’s in the business of watching and rating each and every show (as the independent Motion Picture Association of America does with every theatrically released film), much less each and every episode. So while the board is “responsible for ensuring there is as much uniformity and consistency in applying the Parental Guidelines as possible,” it seems wildly implausible that they’d be able to do so.

Also consider this: In the early 2000s, television was home to about 180 original scripted programs. In 2017, that number had increased to [nearly 500](https://www.nytimes.com/2018/01/05/business/media/487-original-programs-aired-in-2017.html). And that figure continues to grow exponentially: Netflix *alone* reportedly aired some [700 original shows in 2018](https://variety.com/2018/digital/news/netflix-700-original-series-2018-1202711940/). Further, even *that* figure doesn't even account for the parallel explosion of reality TV content, which also gets a rating. So even if television’s monitoring board was equal to the task when it was first formed in the late 1990s (which seems unlikely), the dizzying changes and incredible growth the industry has seen has made the current oversight structure seem insufficient for the task at hand.

For all those reasons, the current iteration of the system still has significant problems, both practically and philosophically—not the least of which is the fact that content providers are allowed to rate their own shows, and that independent oversight of ratings for the sake of accuracy and consistency is virtually impossible.