

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
TV Ratings System and the)	MB Docket No. 19-41
Oversight Monitoring Board)	
)	

**JOINT COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS,
NCTA – THE INTERNET & TELEVISION ASSOCIATION, AND
THE MOTION PICTURE ASSOCIATION OF AMERICA**

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The National Association of Broadcasters (“NAB”), NCTA – the Internet & Television Association (“NCTA”), and the Motion Picture Association of America (“MPAA”) (hereinafter “Joint Commenters”) hereby submit comments in the above-captioned proceeding.¹ Pursuant to Congress’ directive, the Media Bureau seeks comment on “the accuracy of the television content rating system, known as the TV Parental Guidelines, and the ability of the governing body for TV ratings, the TV Parental Guidelines Oversight Monitoring Board, to oversee the ratings system and address public concerns.”

I. INTRODUCTION AND SUMMARY

The Joint Commenters welcome the opportunity to update the Commission about the current state of parental awareness and use of the Guidelines (“Guidelines” or “TV ratings”) and about the operation of the Parental Guidelines Monitoring Board (“Monitoring Board”). The Guidelines are designed to help parents make informed decisions about their children’s viewing. The Guidelines have stood the test of time for more than two decades and are regularly evaluated

¹ See *Media Bureau Seeks Comment on the TV Ratings System and the Oversight Monitoring Board*, MB Dkt. No. 19-41, DA 19-120 (rel. Feb. 26, 2019) (“Public Notice”). These comments are being sought pursuant to a directive in the Consolidated Appropriations Act, 2019, Pub. L. No. 116-6, Explanatory Statement (H. Rept. 116-9, Division D, Title V, p. 673), 133 Stat. 13 (2019).

by the television industry, in consultation with children's and other advocacy groups. Public surveys conducted over the past decade repeatedly show widespread use of the Guidelines as well as consistently high marks for the accuracy of the ratings, and the TV Monitoring Board receives very few complaints each year. Even with this positive track record, the television industry continues to work to improve the ratings system.

In responding to the Media Bureau's request for comment about the ratings system and TV Monitoring Board, the Joint Commenters believe it is important to emphasize the appropriately narrow focus of this inquiry. The Guidelines were adopted by the industry as a system of rating television programming and Congress did not establish a regulatory role for the Commission. Beyond issuing this report,² the Commission's authority to act is highly circumscribed.³ Any attempt to assert greater governmental involvement in rating television programming would exceed statutory boundaries and would necessarily raise significant First Amendment questions.⁴

² The Consolidated Appropriations Act did not provide the Commission additional authority to regulate in this area. Rather, in an explanatory statement attached to the Act, Congress instructed the FCC only to report on the accuracy of the ratings system and the ability of the Monitoring Board to address public concerns. *See id.*

³ *See* Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, § 551(e) (1996) ("1996 Act"); *see also* S. Conf. Rep. No. 104-230, at 195 (1996). "Applicability of rating provision. -- The amendment made by subsection (b) of this section shall take effect 1 year after the date of enactment of this Act, *but only if* the Commission determines...that distributors of video programming *have not, by such date* – (A) *established voluntary rules for rating video programming that contains sexual, violent, or other indecent material about which parents should be informed before it is displayed to children, and such rules are acceptable to the Commission* and (B) *agreed voluntarily* to broadcast signals that contain ratings of such programming." 1996 Act at § 551(e)(1) (emphasis added). The Commission's authority to prescribe regulations to establish a TV rating system under Section 551(b) of the 1996 Act lapsed on March 13, 1998, when the Commission found that the Guidelines satisfied Section 551(e) of the 1996 Act. *See Implementation of Section 551 of the Telecommunications Act of 1996, Video Programming Ratings*, Report and Order, 13 FCC Rcd. 8232 ¶ 4 (1998) ("*Ratings Order*") (explaining that "Congress delayed the Commission's exercise of its authority to establish a rating system to permit the broadcast and cable industries to develop an acceptable voluntary rating system for video programming within one year of the enactment of the 1996 Act on February 8, 1996.").

⁴ *See, e.g., MPAA v. Specter*, 315 F. Supp. 824, 825-826 (E.D. Pa. 1970) (First Amendment bars incorporation of private film ratings system into law); *Engdahl v. City of Kenosha*, 317 F. Supp. 1133, 1135 (E.D. Wisc. 1970) (same). *See also Brown v. EMA*, 564 U.S. 786, 802 (2011) (singling out one medium

II. PUBLIC SATISFACTION WITH THE TV PARENTAL GUIDELINES

Surveys of the public have shown high levels of use of the Guidelines and consistently favorable marks among parents regarding the accuracy of the ratings system. Most recently, in 2018, Hart Research Associates conducted a survey on behalf of the Monitoring Board that found parents continue to value the TV ratings system as a source of information about the content and age-appropriateness of TV programs. According to the 2018 study, 90 percent of parents are aware of the TV ratings system and 88 percent find the TV ratings system helpful. The survey also found that parents understand the ratings and use them to guide their families' TV viewing. Nine in ten parents say they understand the parental ratings, and almost half say they understand them very well. Three in four parents report using the TV ratings often or sometimes; over 90 percent of parents are aware that the TV ratings provide guidance based on a child's age; and, over 75 percent of parents maintain a favorable opinion of the TV ratings system, with only five percent reporting an unfavorable opinion.⁵

With respect to the specific question posed by Congress about whether the ratings match the content being aired, parents express high levels of satisfaction with the accuracy of ratings for TV shows overall (94 percent), and two-thirds of parents say they had not seen any show in the past several months that they felt was rated inaccurately. Only 14 percent of all parents said they had seen an inaccurate rating frequently. And most of those parents who recall seeing inaccurate

for regulation “raises serious doubts about whether the government is in fact pursuing the interest it invokes, rather than disfavoring a particular speaker or viewpoint”).

⁵ Hart Research Associates administered the national online survey among 1,018 parents of children ages two to 17 years old with at least one television, conducted August 9-16, 2018. The survey assessed awareness, use and satisfaction with the TV Parental Guidelines. See http://www.tvguidelines.org/resources/Release_102418.pdf (appended as Attachment A). See also Key Findings From 2018 TV Ratings Research Among Parents (<http://www.tvguidelines.org/resources/2018KeyFindings.pdf>) (appended as Attachment B).

ratings still have a favorable view of the TV ratings system. These findings are consistent with earlier surveys the Monitoring Board conducted.⁶

These positive findings from research surveys are consistent with the direct feedback the Monitoring Board has received from the public. In the past decade, the Monitoring Board has received, on average, no more than 47 complaints per year. In 2018 the Monitoring Board received only 26 complaints about ratings, involving a mere 20 programs. This is particularly notable in light of the significant growth in the number of scripted programs being produced, the many thousands of hours of programs that are rated each year, and the high levels of public awareness and use of the system. There no doubt will be circumstances where a person may disagree about how a particular television program should be rated, but the possibility of such disputes is not a reason to overhaul a system that the vast majority of viewers find beneficial.

Significantly, the ratings system is maintaining this high level of accuracy and consumer satisfaction at the same time that the number of choices audiences have grown exponentially—both in terms of television content and methods of delivery. Over the past two decades, methods of video distribution have expanded and multiple new video providers have entered the market, including those who utilize streaming video, vastly increasing the range of choices available to

⁶ A 2016 survey found that nearly 80 percent of parents reported using the rating system and 96 percent of parents said they were satisfied with the accuracy of ratings for TV shows. Although a minority of parents (35 percent) said they could recall seeing a show they thought might have been inaccurately rated, even among that group, 76 percent viewed the ratings system favorably and 91 percent reported being very or somewhat satisfied with the accuracy of ratings in general. *See* http://www.tvguidelines.org/resources/2016MBKeyFindings_HartResearch.pdf. In 2014, a survey on the Guidelines found that 72 percent of parents reported using the ratings system and over three-quarters of those surveyed had a favorable impression of the ratings (and only six percent viewed the ratings unfavorably). Even among those who reported seeing a program they believed was not rated accurately, 72 percent viewed the rating system favorably. *See* <http://www.tvguidelines.org/resources/KeyFindings2014Research.pdf>. Likewise, in 2011, a survey found that more than two-thirds of parents surveyed used the ratings and 80 percent found the Guidelines were helpful. *See* <http://www.tvguidelines.org/resources/KeyFindings2012Research.pdf>.

viewers, including parents and their children.⁷ The number of scripted original broadcast, cable, and online shows has jumped to a record 495 in 2018 from 216 as recently as 2010, with the number of online originals jumping to 160 from 4 over that same time period.⁸ Technological and market developments allow viewers to access video programming via computers, smart phones, and other portable devices, in addition to traditional television sets. Younger viewers in particular increasingly view video programming using these newer technologies.⁹ As a consequence of these developments, many new sources of programming specifically designed for children are increasingly available, including programming accessible on demand, along with new sources to guide parents toward recommended educational and family friendly websites and apps.¹⁰

⁷ See, e.g., *Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming*, 32 FCC Rcd. 568 ¶¶ 130-132 (2017). See also Consumer Reports, *Guide to Streaming Video Services*, Feb. 26, 2019 (<https://www.consumerreports.org/streaming-media-devices/guide-to-subscription-streaming-video-services/>). Non-traditional sources of programming can also carry ratings, sometimes using the same or similar categorizations and descriptors. See, e.g., <https://help.netflix.com/en/node/2064>; <https://www.amazon.com/gp/help/customer/display.html?nodeId=201423060>.

⁸ Source: FX Research.

⁹ See KidSay TrendTracker - Moms 2018 Report (in 2018 online video streaming displaced traditional broadcast and cable programming as the number one source of television programming for children and families).

¹⁰ See, e.g., *Children's Television Programming Rules*, FCC 18-93 (released July 13, 2018) ¶ 1 (“the amount of programming for children available via non-broadcast platforms, including children’s cable networks, over-the-top providers, and the Internet, has proliferated”); Learning Liftoff, *The 10 Best Educational YouTube Channels for Kids*, Aug. 25, 2017 (<https://www.learningliftoff.com/the-best-educational-youtube-channels-for-kids/>); Saroj Kumar, *10 Top Educational Apps for Kids*, eLearning Industry (<https://elearningindustry.com/10-top-educational-apps-for-kids>); Open Culture, *200 Free Kids Educational Resources: Video Lessons, Apps, Books, Websites & More* (http://www.openculture.com/free_k-12_educational_resources); Common Sense Media, *Best News Websites for Students* (<https://www.common sense.org/education/top-picks/best-news-websites-for-students>).

III. CREATION OF THE RATING SYSTEM

In the Telecommunications Act of 1996, Congress called upon the television industry to voluntarily establish a system for rating television programming.¹¹ In response, the industry—in consultation with scores of parental, medical, religious, child advocacy and educational groups—developed a set of guidelines that give parents information about the content and age-appropriateness of TV programs. In addition, the industry conducted quantitative and qualitative research, including focus groups with parents across the country. The resulting Guidelines, modeled after the familiar movie ratings, include six ratings categories:

- TV-Y (All Children)
- TV-Y7 (Directed to Children Aged 7 and Older)
- TV-G (General Audience)
- TV-PG (Parental Guidance Suggested)
- TV-14 (Parents Strongly Cautioned—may be unsuitable for children under 14)
- TV-MA (Mature Audience Only—may be unsuitable for children under 17).

The TV-Y and TV-Y7 ratings identify programs designed *specifically for* children and were included based on input from children’s advocacy groups. These groups expressed a need for specific ratings for children’s programming, particularly for children under 7 years of age, who may not be able to distinguish reality from fantasy.

After receiving initial input from advocacy groups and policymakers, and working collaboratively with children’s and medical experts, the industry supplemented the age-based ratings with content “descriptors,” to help parents better understand the basis for the age-based

¹¹ See Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, §§ 551(b), (e) (1996). The Conference Committee report on Section 551 specified that “the guidelines and recommended procedures for a rating system are not rules and do not include requirements. They are intended to provide industry with a carefully considered and practical system for rating programs *if industry does not develop such a system itself*. However, nothing in subsection (b)(1) authorizes, and the conferees do not intend that, the Commission require the adoption of the recommended rating system nor that any particular program be rated.” S. Conf. Rep. No. 104-230, at 195 (emphasis added).

rating, so they can make their own judgements about age appropriateness and the types of content their children see. The descriptors are:

- “FV” for fantasy violence in children's programming
- “V” for violence
- “S” for sexual content
- “D” for suggestive dialogue
- “L” for strong language.¹²

Under this revised system, television programming continues to fall into one of the six ratings categories, but the descriptors are added to ratings where appropriate. Programs with similar subject matter may get different ratings depending on how the content in the programming is depicted. The ratings information is prominently displayed at the beginning of, and often after commercial breaks during, all rated programming, and is also embedded in the programming stream so that it can be used with the V-chip. Ratings information is also available in the TV listings of many newspapers, in other printed and online program listings, and on numerous web sites.

In conjunction with the Guidelines, the television industry established a Monitoring Board, comprised of experts from the TV industry and children’s advocacy and other third-party groups, that seeks to ensure accuracy and consistency in application of the Guidelines. It does so by receiving and responding to comments and complaints from the public, and by facilitating discussions among industry executives responsible for applying ratings. Based on this input as well as other research, the Monitoring Board works with companies to ensure that the Guidelines are applied accurately and consistently to TV programs.

¹² In developing the revisions to the TV Parental Guidelines, the industry received input from the American Medical Association, American Academy of Pediatrics, American Psychological Association, Center for Media Education, Children’s Defense Fund, Children Now, National Association of Elementary School Principals, National Education Association, and National PTA.

The television industry submitted the Guidelines to the Commission in 1997. A number of prominent advocacy groups, including educational, medical, and children's organizations and associations, endorsed the Guidelines. On March 13, 1998, the Commission issued its finding that the Guidelines satisfied Section 551(e) of the 1996 Act.¹³ The Commission simultaneously adopted technical requirements for the V-chip, a technology built into television sets to allow parents to block programs based on their rating.¹⁴

IV. OPERATION OF THE RATING SYSTEM

A. The TV Parental Guidelines

Ever since the Guidelines were adopted and implemented, broadcast and cable networks have included ratings for thousands of hours of TV programming every day. The Guidelines apply to most television programs, including, as stated above, those directed specifically to young children. Some programming, such as sports and news, is not rated.¹⁵ Most home shopping and religious programming is also not rated.

The television industry's process for determining the appropriate rating for each of the multitude of programs aired every day is careful and considered. Program producers, broadcast and cable networks, broadcast stations, and syndicators expend significant resources reviewing and rating programs before they air, and have, in some cases, teams of employees dedicated to

¹³ See *Ratings Order*, 13 FCC Rcd. 8232 ¶¶ 18-19.

¹⁴ See *Technical Requirements to Enable Blocking of Video Programming Based on Program Ratings, Implementation of Section 551(c), (d), and (e) of the Telecommunications Act of 1996*, Report and Order, 13 FCC Rcd. 11248 (1998) ("V-chip Order").

¹⁵ See *Ratings Order* ¶ 21 (finding it reasonable to exempt sports and news programming). Made-for-TV movies are rated using the Guidelines, as are theatrical movies that are modified for distribution on broadcast and cable networks. However, uncut theatrical movies, such as those carried on premium networks, carry the original MPAA movie rating in addition to supplemental content advisories provided by the network.

ensuring that programs are accurately rated. When a program is considered for production, executives responsible for parental ratings (typically in the standards and practices division) discuss with management the target demographic and work closely with production in the various stages (concept, script, rough cut, final cut) to ensure the program conforms with the intended age-group and parental rating. A rating is considered but not assigned until each episode is delivered for air. At that time, the program and ratings are evaluated to assess whether the original rating is still appropriate for the episode and, if not, the rating (either age-based category or descriptors) may be changed to reflect the final episode. As part of this process, standards and practices executives may consult with their industry peers to determine how others are handling similar ratings-related issues, which helps ensure consistency in applying ratings across networks. In its oversight role, the standards and practices division has the final authority on assignment of parental ratings. For episodic television programs, each individual episode is rated.¹⁶ This means that individual episodes within a given series may be rated differently depending on the content of each episode.

Today, the program ratings and content descriptors are familiar to any TV viewer. The ratings icon and associated content descriptors appear for 15 seconds in the upper-left corner of the TV screen at the beginning of all rated programming. If the program is more than one-hour in length, the icon will reappear at the beginning of the second hour. Some broadcast and cable networks also display the ratings icon after each commercial break to alert viewers of the TV rating throughout the program, and to inform those viewers who may tune in after the program has already begun.

¹⁶ See TV Parental Guidelines Brochure (http://www.tvguidelines.org/resources/TV_Parental_Guidelines_Brochure.pdf) (appended as Attachment C).

In addition to visually displaying the ratings information on-screen, cable networks and broadcast stations also encode the ratings information in their program streams so it can be “read” by television sets and other retail devices equipped with the so-called V-chip.¹⁷ Consumers can block shows with certain ratings by following an easy-to-use on-screen menu of options available on their V-chip-equipped TV sets or parental control systems offered by cable and satellite systems. Using the Guidelines, parents can block shows according to the age-based categories (such as TV-14) or content labels (such as V for violence), or a combination of the two (such as TV-14/V but not TV-14/D). The V-chip works in a hierarchical manner, so that when a parent chooses to block programming with a certain age-based rating, all programming with ratings above that level are blocked automatically.¹⁸ The V-chip and parental control systems provide similar functionality for content descriptor settings.¹⁹ This allows parents to easily block all categories of programming about which they may be concerned.

The Guidelines can assist parents’ decision-making even when they choose not to take advantage of V-chip or parental control functionality. In that regard, the Guidelines are part of a range of tools and strategies parents may employ to manage and oversee their children’s media consumption. These include, for example, setting rules about when their children can use TV and what channels they can watch, keeping the TV in a common area in the home so parents can monitor

¹⁷ The TV Parental Guidelines were designed to work with the V-chip, which has been included in all TV sets that are 13 inches and larger built after January 1, 2000. *See V-chip Order, supra* note 14; *see also* 47 C.F.R. § 15.120(b).

¹⁸ For example, if a parent elects to block programming that is rated TV-PG, the V-chip will also block all programming that is rated TV-14 and TV-MA.

¹⁹ While TV menus vary by manufacturer and brand, the V-chip gives parents the option to select among different levels in a particular content category, *e.g.*, moderate (or TV-PG) violence, and so forth in the “V” category. If the parent elects to block programming with moderate (TV-PG) violence, the V-chip will also block programming with more intense (TV-14 and TV-MA) violence.

what their children are watching, and watching TV with their children. The Guidelines also complement third-party services that offer programming recommendations.

In the years since the rating system was adopted, the television industry has invested substantial resources in educating parents about the Guidelines and the V-chip. In 2006, the industry launched a multi-year, \$340 million advertising campaign with the Ad Council and others to encourage parents to take a more active role in their children's television viewing and help educate parents about the Guidelines and the V-chip. These education efforts have been ongoing, and the industry regularly reinvigorates its education campaigns. For example, in 2013, industry renewed its efforts to ensure that parents are aware of, and have easy access to, the evolving tools and information available to help families manage and enjoy media. Elements of this campaign include updated public service advertising featured on broadcast, cable, other multichannel video outlets, and in movie theaters; and new and updated websites providing a one-stop shop solution for consumers seeking information on TV and movie ratings systems, parental control technology and media literacy. Just last year, the industry updated the Guidelines website with expanded functionality, and the website will soon be available in both English and Spanish. The industry also has engaged in outreach to teachers and parents and, in keeping with its periodic visits to such gatherings, in 2018 attended the National PTA Convention and Expo to disseminate newly developed information about the Guidelines.

B. The TV Parental Guidelines Monitoring Board

The TV Parental Guidelines Monitoring Board includes representatives from cable and broadcast networks, broadcast stations, and syndicators, as well as third-party groups with an interest in children and media. The Monitoring Board is comprised of up to 24 members—the chairman (the head of the MPAA, NCTA or NAB on a rotating basis), as many as 18 industry

members (from the broadcast, cable, and creative communities and appointed by the NAB, NCTA and MPAA) and five public interest members (appointed by the Monitoring Board chairman).²⁰ The Monitoring Board works closely with interested parties—including content producers, distributors, and consumers—to help ensure accuracy and consistency in the application of the Guidelines to TV programming.

The Monitoring Board provides oversight by reviewing complaints and other public input and by facilitating discussion among members of the Monitoring Board about the application of ratings, including consistency issues. It meets annually (more often, as necessary) to consider and review correspondence sent to the Monitoring Board, to discuss current research, and to review any other issues relevant to the Guidelines. The Monitoring Board also forwards viewer correspondence regarding the ratings to the network at issue for a direct response to the viewer.

In recent years, the Monitoring Board has redoubled its efforts to ensure ratings are applied consistently across channels. Industry standards and practices executives have attended regular meetings and participated in periodic calls to review ratings issues. These conversations have resulted in a more common and consistent understanding of how ratings should be applied. If there are widespread and verifiable complaints about a particular show's rating, the Monitoring Board may decide whether that rating is appropriate. The Monitoring Board has received such complaints about only a handful of programs since the creation of the Guidelines. It has

²⁰ Currently, Michael Powell, president and CEO of NCTA, serves as the chairman of the Monitoring Board. Current members include representatives from 21st Century FOX, ABC, A+E Networks, AMC Networks, American Academy of Pediatrics, Boys and Girls Clubs of America, Call for Action, CBS, Discovery, Inc., Entertainment Industries Council, HULU, Lifetime Networks, National PTA, NBC Universal, Sony Pictures Entertainment, Turner Broadcasting System, Univision, and Viacom Media Networks. Cogent Strategies serves as the executive secretariat of the Monitoring Board.

investigated these complaints and, where necessary, worked with the producer or network to amend the rating.

Even in the absence of widespread complaints, networks may change ratings based on viewer input. In addition, networks monitor each other's ratings and may raise questions about a particular rating in Monitoring Board discussions. Such actions have resulted in changes to ratings in some cases. In summary, the Monitoring Board and its members take their responsibilities seriously to provide accurate, consistent ratings and to respond to viewer concerns about the rating assigned to particular programs.

V. CONCLUSION

For the foregoing reasons, the Joint Commenters request that the Commission issue a report in this proceeding concluding that the TV rating system continues to provide an accurate and reliable tool for parents to use in making decisions about their children's television viewing.

Respectfully submitted,



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ATTACHMENT A



October 24, 2018

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New Study Reports High Usage and Favorable Views of TV Parental Guidelines
Parents continue to express near unanimous satisfaction with the accuracy of TV ratings

Washington, DC - A recent survey about TV Parental Guidelines (i.e., the TV ratings system) revealed that American parents continue to report high levels of usage of, and positive sentiment toward, the TV ratings system.

Among topline results, the survey found that:

- Nine in 10 parents (90 percent) are aware of the TV ratings system.
- Nearly 95 percent of parents remain satisfied with the accuracy of ratings for TV shows.
- Nearly nine in 10 parents (88 percent) find the TV ratings system helpful.
- Three in four parents report using the TV ratings often or sometimes.
- Over 90 percent of parents are aware that the TV ratings provide guidance based on a child's age.
- Over 75 percent of parents maintain a favorable opinion of the TV ratings system.

The national online survey was conducted by Hart Research Associates on behalf of the TV Parental Guidelines Monitoring Board in August 2018. Respondents included 1,018 parents of children age two to 17 in households with at least one television. The survey is a follow-up to online surveys conducted in 2011, 2014 and 2016, and is part of the TV Parental Guidelines Monitoring Board's ongoing tracking of American parents' awareness, usage and feelings toward TV ratings.

Among other trends, the 2018 survey found usage of TV ratings varies by age of children and race/ethnicity of the parent. Fully 80 percent of parents with children ages two to five years old often or sometimes use the ratings compared to 63 percent of parents who use the ratings for their children who are 16 and 17 years old. Hispanic parents (85 percent) and African American parents (84 percent) use the ratings more than white parents (70 percent).

The survey also found that children's use of mobile devices, particularly smartphones, to watch television programming continues to rise. More than half (57 percent) of parents report that their child has used a smartphone to watch TV programming in the past two or three weeks, a notable increase since 2016 (42 percent) and 2014 (37 percent). Usage of tablet devices like an iPad has increased slightly as well to 52 percent - up from 49 percent in 2016 and 38 percent in 2014. Viewing of TV content streamed from the Internet to a TV has also steadily increased from 47 percent in 2014 to 63 percent in 2016 to 69 percent in 2018.

The overall results of the study indicate that parents continue to value the TV ratings system as a source of information about the content and age-appropriateness of TV programs. The TV Parental Guidelines were developed two decades ago to help



parents make more informed decisions about what programming their kids are watching on television.

###

About the TV Parental Guidelines

The TV Parental Guidelines were created in 1996 to help parents monitor and control what their children watch on the increasing number of TV channels available in American homes each day. Designed by leading organizations of the TV industry to give parents more information about the age-appropriateness and content of TV programs, the Guidelines, modeled after the familiar movie ratings, are easily recognizable and easy to use. They apply to most television programs, including those geared towards young children. The TV Parental Guidelines Monitoring Board is responsible for overseeing the TV Parental Guidelines and for ensuring uniformity and consistency in the application of the Guidelines. The Board is comprised of 24 members from the broadcast and cable television industries, as well as the program production and public interest communities. The Board of Directors consists of the chief executive officers of the Motion Picture Association of America (MPAA), NCTA - The Internet & Television Association, and the National Association of Broadcasters (NAB). For more information, please visit www.tvguidelines.org.

ATTACHMENT B

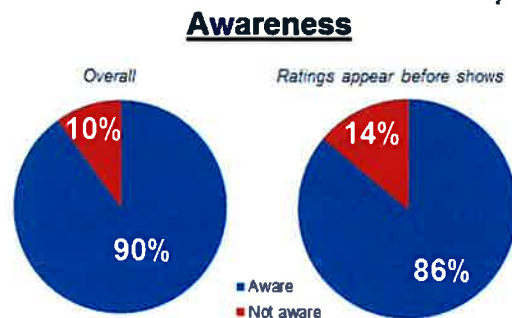
Key Findings from 2018 TV Ratings Research Among Parents

From August 9 to 16, 2018, Hart Research Associates conducted a national online survey among 1,018 parents of children age two to 17 in households with at least one television. The survey is a follow-up to online surveys conducted in June 2016, May 2014, and November 2011, and is part of the TV Parental Guidelines Monitoring Board's ongoing tracking of American parents' awareness of TV ratings, reported usage of TV ratings, and feelings toward TV ratings.

Overview: Parents continue to report high levels of usage of and positive sentiment toward the TV ratings system. Nearly nine in 10 parents (88%) find it helpful. Three in four parents report using the system often or sometimes, and a similar proportion have a favorable opinion of it (76%). Parents continue to express near unanimous satisfaction with the accuracy of ratings for TV shows overall (94% satisfied).

Awareness of the TV ratings system remains high, and most parents continue to say they understand TV ratings.

- Fully 90% of parents are aware that broadcast and cable networks provide parental ratings for TV programs—only a slight drop since 2016 (94%). Nearly as many (86%) are aware that these ratings appear on screen at the start of the program (89% in 2016).

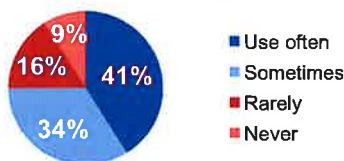


- Drops in awareness of parental TV ratings are small, but where they do exist, they are greatest among Millennial parents, parents with children age two to five, and African Americans.
- Nine in 10 (90%) parents say they understand the parental ratings for TV programs, including 48% who say they understand parental ratings very well. This has held steady over the past two years: in 2016, 91% said they understood them, including 47% who said they understood them very well.
- When it comes to more specific elements of the TV ratings system, parents remain most aware of ratings that provide guidance based on a child's age (91% in both 2018 and 2016) and the use of letters that provide information about program content like suggestive or crude language, sexual situations, or violence (83% in 2018 and 84% in 2016).

The majority of parents have a favorable opinion of the TV ratings system. Nearly nine in 10 find the parental ratings for TV helpful, and their usage of the ratings system remains high.

- Three in four (76%) parents view the parental ratings for TV programs favorably—a slight drop from 2016 (79%) but the same as 2014 (76%). Most parents (88%—the same as in 2016) continue to find the TV ratings system helpful. Half (50%) find parental TV ratings very helpful, similar to 49% in 2016 and up from 41% in 2014.
 - Specific aspects of the TV ratings system that add to parents’ favorable opinion of it include program ratings using letters that provide information about program content (69% say content ratings give them a more favorable opinion of the TV ratings system) and guidance based on the child’s age (66% say this makes them more favorable).
- Most parents (75%) report using the parental ratings sometimes or often when deciding whether their child can watch a particular TV show, similar to 2016 (77%). A notable 41% say they often use parental ratings, while only a quarter (25%) say they rarely or never use them.
 - Parents of older teens age 16 to 17 (63% often or sometimes) report lower usage of the TV ratings system than parents of 13- to 15-year-olds (70%), 11- to 12-year-olds (78%), and those with younger children (80%). African Americans (84%) and Hispanics (85%) report higher levels of use than whites (70%).

Usage



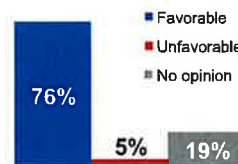
Understanding



Helpfulness



Favorability

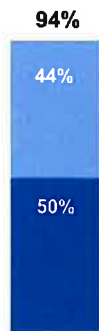


Parents continue to express near-unanimous satisfaction with the accuracy of ratings for TV shows overall, and only one in three recalls seeing a show in the past three months that they felt was rated inaccurately.

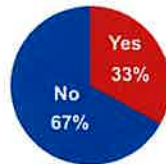
- When presented with a summary of the six TV ratings categories and five content descriptors used to rate TV programs, fully 94% of parents said they are satisfied with the accuracy of parental ratings for TV shows on broadcast and cable television, including 50% who are very satisfied. Only 6% feel dissatisfied.
- Two-thirds (67%) of parents say they have not seen any show on TV in the past two or three months with a rating that they thought was clearly inaccurate, similar to 65% in 2016. Although 33% have seen a show with an inaccurate rating, only 14% of all parents say this has happened frequently.
 - More than seven in 10 (72%) parents who recall seeing inaccurate ratings still feel favorable toward the parental ratings system, and 89% are still somewhat or very satisfied with its accuracy.

Satisfaction with TV ratings

■ Somewhat satisfied
■ Very satisfied



Seen inaccurate rating



Satisfaction among seen inaccurate rating



Frequency of inaccurate ratings

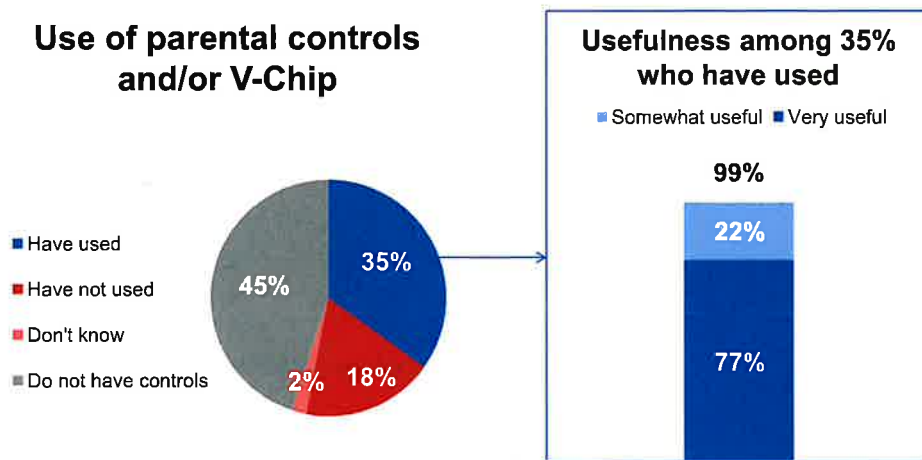
■ Very frequent ■ Somewhat ■ Not very ■ Not at all ■ Not seen inaccurate ratings



Usage of parental controls or a V-Chip has held steady at just over one in three parents, and virtually all parents who have used these controls have found them useful.

- Of the 35% of parents (36% in 2016) who have used parental controls from their cable/satellite system and/or V-Chip to block shows or channels, virtually all have found them to be very (77%) or somewhat (22%) useful.
 - Parents who use parental controls rely on TV ratings more than parents overall. Nearly nine in 10 (88%) of those who use V-Chip or cable/satellite

- parental controls often or sometimes use parental TV ratings (compared with 75% of parents overall), and 97% who use these controls find the ratings helpful (88% overall).
- When asked why they have never used parental controls or V-Chip, parents who have them but do not use them most commonly volunteer that an adult is usually nearby when their children watch TV (49%), they have house rules about what their children can watch (45%), or they trust their children to make their own decisions (42%).
- Forty-four percent (44%) of parents have used types of parental controls beyond those offered through their cable/satellite system or V-Chip (such as controls available through mobile devices, apps, their cellular provider, or streaming services).
 - 10% have only used parental controls from cable or satellite companies or the V-chip, 19% have used only other types of parental controls, and 25% have used both.



Children’s streaming of TV programming on a variety of devices continues to rise.

- Fully 83% of parents report that their children have streamed TV programming from the Internet to a TV or on an alternative device (smartphone, tablet, computer, gaming console, etc.); only 17% say their children have not streamed any programming.
 - Viewing of TV content streamed from the Internet to a TV has increased from 47% in 2014 to 63% in 2016 to 69% in 2018.

- Besides streaming to a television, the majority of parents (79%) report that their child has recently watched TV shows on at least one alternative device, including a smartphone, tablet, video game console, laptop or desktop computer, or other handheld electronic device.
- More than half (57%) of parents report that their child has used a smartphone to watch TV programming in the past two or three weeks, a notable increase since 2016 (42%) and 2014 (37%). Usage of tablet devices like an iPad has increased slightly to 52% (from 49% in 2016 and 38% in 2014).

ATTACHMENT C



UNDERSTANDING THE TV RATINGS AND PARENTAL CONTROLS



ABOUT THE TV RATINGS AND PARENTAL CONTROLS

With an increasing number of TV channels and programs coming into our homes each day, it can be hard for parents to monitor what their children are watching. Many parents are concerned about their young children watching programs with content that's more suitable for older children or adults.

TV RATINGS

The television industry designed a TV ratings system to give parents more information about the content and age-appropriateness of TV programs. These ratings, called the TV Parental Guidelines, are modeled after the familiar movie ratings, which parents have known and valued for decades. They are designed to be easily recognizable and simple to use. The Guidelines apply to most television programs, including those directed specifically to young children. However, sports and news shows do not carry the Guidelines.

The Guidelines appear in the upper left corner of the TV screen at the beginning of TV shows, and often again after commercial breaks.

THE V-CHIP AND PARENTAL CONTROLS

The TV Parental Guidelines can be used in conjunction with the V-Chip — a device built into most television sets since 2000 — to allow parents to block out programs they don't want their children to see. The V-Chip electronically reads television program ratings and allows parents to block programs they believe are unsuitable for their children. Parental control technology in cable and satellite set-top boxes can also be used with the TV Parental Guidelines to block programs based on their rating.

TV RATINGS OVERSIGHT

The TV Parental Guidelines Monitoring Board is responsible for ensuring there is as much uniformity and consistency in applying the Parental Guidelines as possible and is comprised of experts from the television industry and public interest advocates. The Board also reviews complaints about specific program ratings to help ensure accuracy. Individuals can contact the Board via mail, phone or e-mail to voice complaints.

FREQUENTLY ASKED QUESTIONS

ABOUT THE TV RATINGS

What are the TV Ratings?

The TV Ratings, also called the TV Parental Guidelines, provide information about the content and age-appropriateness of TV programs. The TV Parental Guidelines include two elements: an age-based rating that provides guidance about the age group for which a program is appropriate, and content descriptors indicating that a program may contain suggestive dialogue (D), coarse or crude language (L), sexual situations (S), or violence (V).

Do ratings exist that are specifically designed for children?

Yes. Children's programming is rated according to two categories: TV-Y and TV-Y7. A TV-Y rating means that programming is appropriate for children of all ages. TV-Y7 indicates that programming is designed for children ages 7 and older. An additional rating, TV-Y7-FV, is used to indicate that a program contains "fantasy violence" that may be more intense or combative than other TV-Y7 programs.

Are all TV programs rated?

The Guidelines apply to most television programs. However, news and sports are exempt from the TV ratings system. In addition, some categories of programming, such as religious and home shopping programs, do not typically carry a rating.

Are movies that air on TV rated?

Made-for-TV movies are rated using the TV Parental Guidelines. Theatrical movies are typically edited when they air on broadcast or basic cable channels. The broadcast or cable network cuts content from the movie according to the channel's standards. After the movie has been modified, it is given a TV Parental Guideline rating. Premium cable networks like HBO and Showtime run uncut theatrical movies. These movies carry the original MPAA movie rating, in addition to supplemental content advisories provided by the network.

Who decides how a program is rated?

Programs are voluntarily rated by broadcast and cable television networks, or program producers.

I am a program producer and/or represent a television network; how do I rate my programming?

The descriptions of the ratings categories serve as the basis for applying ratings. E-mail the Monitoring Board with additional questions.

How is the rating displayed on the TV?

A ratings icon appears in the upper left corner of the TV screen during the first 15 seconds of the program. If the program is more than one hour, the icon will reappear at the beginning of the second hour. Many broadcast and cable television networks also display the rating after each commercial break.

Where else can you find a program's rating?

Other places to find program ratings are: 1) local newspaper listings; 2) TV Guide (either paper copy or online); 3) local cable guides; and 4) on-screen cable program guides. Additionally, some television broadcast and cable networks list the program ratings on their web sites.

Does a program carry the same rating week after week?

Programs are rated by episode and, therefore, may carry a different rating based on the content.

Why would a program be rated differently when being aired on different channels?

Programs are often edited for content when being aired on different channels and would be rated accordingly.

UNDERSTANDING THE TV RATINGS

Audience: indicates the audience for which a television program is appropriate. —>

Content Label: indicates a show may contain violence, sex, adult language, or suggestive dialogue. —>



The Content Labels

TV Parental Guidelines may have one or more letters added to the basic rating to let parents know when a show may contain violence, sex, adult language, or suggestive dialogue.

D – suggestive dialogue (usually means talks about sex)

L – coarse or crude language

S – sexual situations

V – violence

FV – fantasy violence (children’s programming only)



All Children

This program is designed to be appropriate for all children. Whether animated or live-action, the themes and elements in this program are specifically designed for a very young audience, including children from ages 2–6. This program is not expected to frighten younger children.



Directed to Older Children

This program is designed for children age 7 and above. It may be more appropriate for children who have acquired the developmental skills needed to distinguish between make-believe and reality. Themes and elements in this program may include mild fantasy violence or comedic violence, or may frighten children under the age of 7. Therefore, parents may wish to consider the suitability of this program for their very young children.



Directed to Older Children – Fantasy Violence

For those programs where fantasy violence may be more intense or more combative than other programs in this category, such programs will be designated TV-Y7-FV.



General Audience

Most parents would find this program suitable for all ages. Although this rating does not signify a program designed specifically for children, most parents may let younger children watch this program unattended. It contains little or no violence, no strong language and little or no sexual dialogue or situations.



Parental Guidance Suggested

This program contains material that parents may find unsuitable for younger children. Many parents may want to watch it with their younger children. The theme itself may call for parental guidance and/or the program may contain one or more of the following: some suggestive dialogue (D), infrequent coarse language (L), some sexual situations (S), or moderate violence (V).



Parents Strongly Cautioned

This program contains some material that many parents would find unsuitable for children under 14 years of age. Parents are strongly urged to exercise greater care in monitoring this program and are cautioned against letting children under the age of 14 watch unattended. This program may contain one or more of the following: intensely suggestive dialogue (D), strong coarse language (L), intense sexual situations (S), or intense violence (V).



Mature Audience Only

This program is specifically designed to be viewed by adults and therefore may be unsuitable for children under 17. This program may contain one or more of the following: crude indecent language (L), explicit sexual activity (S), or graphic violence (V).

FREQUENTLY ASKED QUESTIONS

ABOUT THE V-CHIP

Is there a V-Chip in every television?

The V-Chip is in every television set 13 inches or larger manufactured after January 2000 and some sets sold after July 1, 1999. This means if you bought a new television set after July 1, 1999, it is most likely equipped with a V-Chip.

How do I program and activate the V-Chip?

Each television set's V-Chip works a little differently. Once you understand the definition of each rating and content label, programming and activating the V-Chip is as simple as following the set-up procedure, which can be found in one of two places: 1) the television on-screen menu options or 2) the written instruction guide included in the owner's manual. The V-Chip will only be activated if you select the option to do so.

How do I ensure that my child will not de-activate the V-Chip?

To activate the V-Chip, a password is required. This identification number acts as the password to activate, de-activate, and change the settings of the V-Chip.

Does the V-Chip turn off when I turn my television off?

Turning the television off will not turn off the V-Chip. It will continue to block programs when the television is turned on again.

What if I forget my V-Chip password?

Your TV's operating manual should have instructions on reprogramming your password. Most will offer two options: a customer service number to call or instructions in the operating manual that explain how to create a new password.

What type of programming does the V-Chip block?

The V-Chip can block programming by age-based category or content label. For instance, if you want to block all TV-14 programs, you can do so by selecting TV-14. If you only want to block TV-14 programs with intense violence (i.e., the program carries a "V" content label), you can select TV-14-V. You should also know that when you block a particular age-based rating, all categories above that will be blocked. For example, if you block TV-14 programs, all TV-MA programs will also be blocked.

Can the V-Chip block out motion pictures that carry the MPAA rating?

Yes. The V-Chip also allows you to block uncut motion pictures that carry the original MPAA rating. Motion pictures that are uncut and unedited typically run on premium channels (e.g. HBO and Showtime).

Can I override the V-Chip settings if I want to watch a program?

Yes, you can turn the V-Chip off by entering the password and following the directions provided on your TV set. You can reactivate the V-Chip the same way.

How do I change the settings on my V-Chip?

Your settings can be changed at any time by entering in the password and following the directions provided on your TV set.

FREQUENTLY ASKED QUESTIONS

ABOUT THE TV RATINGS (continued)

What is syndicated programming, and how is it rated?

Syndicated programs are those programs such as talk shows, game shows, and reruns of dramas and sitcoms first run by broadcast or cable networks, which are then licensed and aired by secondary outlets, such as local television stations. The distributor of such programs is usually responsible for rating them.

Are commercials rated? Can commercials be blocked?

Television advertising is not rated, and therefore, cannot be blocked.

Are network promotions rated?

Network promotions are advertisements for a specific daily or weekly program or block of programs. Many promotions display the rating that the program will carry.

Do newspapers carry the TV Parental Guidelines?

A number of newspapers print the rating next to the program name and scheduled time in the listing guide. If your local newspaper does not list the TV ratings, call and ask that it do so.

Will the February 17, 2009 transition to digital-only broadcasts from local stations impact the ratings system?

The ratings system and your ability to use parental control tools will not be affected by the transition to digital television. However, in order to ensure that your television service is uninterrupted, you may need to take steps to prepare your household to receive a digital signal. For more information, please visit <http://www.dtvtransition.org>.

Where do I send complaints about a program's rating?

The TV Parental Guidelines Monitoring Board is responsible for ensuring that the ratings are applied accurately and consistently. Individuals can contact the Board via mail, phone, or e-mail to voice complaints.

FREQUENTLY ASKED QUESTIONS

ABOUT OTHER PARENTAL CONTROLS

Do other parental control tools exist in addition to the V-Chip?

Additional parental control tools are also available through cable set-top boxes and satellite services, which will often allow you to block programs by channel, title, rating, or time/date. For more information, please visit the Using Parental Control Tools page or the Resources page on www.tvguidelines.org.

Are additional tools available through cable set-top boxes?

Yes, most set-top boxes allow parents to block programs by channel, title, rating, time and date. You can also block pay-per-view and video on demand purchases. The "Menu" or "Settings" options will often provide instructions for blocking programs, or visit www.thetvboss.org or the Resources page on www.tvguidelines.org for more detailed instructions.

Do satellite services offer additional parental control tools?

Yes, satellite services also offer the option to limit programming based on rating and channel, as well as options to limit television viewing hours and establish spending limits on pay-per-view services. For instructions for specific satellite services, please visit www.thetvboss.org or the Resources page on www.tvguidelines.org.

CONTACT US

The television industry is pleased to provide the TV Parental Guidelines as a public service and welcomes your feedback. The TV Parental Guidelines Monitoring Board handles public comments and information on the rating system.

For further information about the Guidelines, write, call, or e-mail:

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