

April 26, 2016

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Television Content Ratings System

Dear Chairman Wheeler and Commissioners,

We are writing as independent private citizens who are expert researchers in media ratings, media effects research, and/or child development. We recommend that hearings be held on the effectiveness of the current television ratings system in order to determine how they should be improved. Media ratings are useful only if two conditions are met. First, they are needed only if it can be shown that media have important effects on children. Second, they are useful only if parents believe them to be valid and effective. Scientific research conducted by us and others provides useful information on both of these questions.

Over the past 60 years, hundreds of studies have demonstrated that television, movies, video games, and other media can have both important benefits and harms for children. Some of these effects, such as effects on decreased school performance (Huston et al., 1992) or increased obesity (Laurson et al., 2008), are related to the amount of time children spend with screen media. A majority of the research, however, has focused on the effects of content (Strasburger, Wilson, & Jordan, 2014).

Several studies have demonstrated that educational content can have profoundly valuable effects. For example, research has shown that *Sesame Street* improves children's school readiness (Fisch & Truglio, 2001), and that this early benefit lasts through high school (D. R. Anderson, Huston, Schmitt, Linebarger, & Wright, 2001).

Research has also documented harmful effects of violent content; indeed, this is by far the most thoroughly researched area of media effects. Violent media can increase aggressive

thoughts, feelings, and behaviors, both in the short and long term (C. A. Anderson et al., 2003; Gentile, 2014; Huesmann, Moise-Titus, Podolski, & Eron, 2003). Sexual media exposure is related to earlier and riskier sexual activity (Brown & Newcomer, 1991; Huston, Wartella, & Donnerstein, 1998; Moore et al., 1995; Strasburger et al., 2014; Zillman, 2000).

Parents also are concerned about the ethical and moral values to which their children are exposed, although these issues have not been studied empirically in as much detail. Research findings, parental concern, and political pressure on the entertainment industry led to the creation of media rating systems, so parents could be informed about media content before allowing children watch.

The television rating system has been in place since 1998. The media landscape has changed dramatically since then. Television now has hundreds of channels and is watched on smart phones and other devices. Furthermore, the content of media has changed, including more content that is potentially harmful (Nalkur, Jamieson, & Romer, 2010). Children's access to these greater media options has also increased (Rideout, Foehr, & Roberts, 2010), highlighting the need for consistent, valid, and informative ratings.

Unfortunately, the rating systems have many problems. The ratings are often applied in an inconsistent manner. In a study of 2,757 television programs, 79% of shows containing violence failed to include the V (violence) descriptor rating, 91% of shows with offensive language failed to include the L (offensive language) rating, and 92% of shows with sexual content failed to include the S (sexual scenes) rating (Kunkel et al., 2001). Ratings also have recently been criticized for a lack of temporal consistency, becoming more lenient over time (called "ratings creep") (Gentile, 2008). Ratings creep can also occur for those who assign the ratings — the more violent and sexual videos they see, the more lenient the ratings they assign (Romer et al., 2014).

Studies have also demonstrated that the current rating systems lack validity, as measured by inaccurately labeling content known to be harmful or by being incongruent with parents' perceptions (since they are the consumers of ratings) (Kunkel et al., 2001; Thompson & Yokota, 2004; Walsh & Gentile, 2001). In one study of 1332 TV shows, researchers coded dimensions that pose the highest degree of risk for harmful effects on youth and compared these with the assigned TV ratings (Kunkel et al., 2001). The industry ratings did not match the content of the shows. For example, more than two-thirds of children's shows with high-risk violent content

were rated as TV-Y (the youngest rating) and did not include the V (violence) descriptor. In summary, research demonstrates serious problems with each rating system, which must hamper their usefulness for parents.

National studies of parents demonstrate that fewer than half of parents use the television ratings regularly (Gentile, Maier, Hasson, & de Bonetti, 2011). This is surprising, because studies also demonstrate that parents greatly desire ratings. It is less surprising, however, once we examine how useful they are for parents. Only 15% of parents say they get all of the information they need from the ratings, and only 5% believe that the ratings are always accurate. More importantly, a national study of parents demonstrated that parents generally do not agree what ages different types of content are appropriate for (Gentile et al., 2011). That is, a majority of parents will always disagree with any age chosen for a rating, which means that **age-based ratings are invalid**. In contrast, parents want to know detailed information about many types of content.

Many surveys of parents and experts have shown that content-based systems are preferred (Cantor, 1997a, 1998; Cantor, Stutman, & Duran, 1996; Children Now, 1996; Gentile, 1996; Gentile et al., 2011). Other studies have documented that age-based ratings are more likely to enhance children's interest (the "forbidden fruit" effect), whereas content-based ratings are more likely to decrease it (the "tainted fruit" effect) (Bickham & Wright, 2001; Bushman & Cantor, 2003; Cantor, 1997a, 1997b, 2003; Krackmar & Pulaski). Furthermore, several recent studies have documented "ratings creep," a shift over time for more mature content to get lower age-based ratings (Gentile, 2008; Nalkur et al., 2010; Thompson & Yokota, 2004; Walsh & Gentile, 2001). A content-based system would be less prone to ratings creep because it is designed to simply record the presence or absence of specific content, not to make a judgment about its appropriateness. Furthermore, it becomes clearer and simpler for parents, as they no longer would need to guess what a vague label like "PG-13: Parental guidance suggested" means

Ratings can be effective only if they (1) indicate content that can be beneficial or harmful and (2) are useful for parents. A great deal of valid scientific research has shown that ratings can indicate such content, but to date such valid content rating systems have not been implemented in a way that is useful for parents. For this reason, **we are asking for the FCC and Congress to hold hearings on the ratings and how they could be changed to be valuable for the public.**

We sign below as individual and independent scientific researchers, and the views expressed here do not necessarily reflect those of our host institutions or the professional societies to which we belong.

Sincerely,

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