

Before the FEDERAL COMMUNICATIONS COMMISSION
In the Matter of TV Ratings System and the Oversight Monitoring Board
MB Docket No. 19-41

REPLY COMMENTS OF DR. JOEL TIMMER

I hereby submit my article, "TELEVISION VIOLENCE AND INDUSTRY SELF-REGULATION: THE V-CHIP, TELEVISION PROGRAM RATINGS, AND THE TV PARENTAL GUIDELINES OVERSIGHT MONITORING BOARD," which was published in the academic journal *Communication Law & Policy*. This article discusses the role of the Oversight Monitoring Board in the development, adoption, and implementation of the TV Ratings System, as well as the activities of the Board since that time, through 2012. The article specifically addresses the activities of the Board in the following areas:

- Receiving and Responding to Consumer Complaints (pp. 283-85),
- Ensuring Accuracy and Consistency in Application of the Ratings (pp. 296-98),
- Providing Information to Producers and Other Program Distributors Concerning the Guidelines (pp. 288-90), and
- Conducting Research (pp. 290-93)

My research revealed that while the Board was active in its first years of existence, it has been considerably less active since that time. As a result, the Board has been less effective in the areas listed above than it could be. The article offers recommendations for increasing the Board's effectiveness, which include:

- Reviewing, conducting, or sponsoring research on the accuracy and consistency with which ratings are applied to programs, and using that research to provide guidance to industry to help improve ratings accuracy and consistency (pp. 305-07);
- Being more open and public about the Board's activities, particularly in regard to its role in collecting and reviewing complaints, and its review of complaints and the decisions/actions taken as a result of that review (pp. 295-301, 304-05);
- Changing the composition of the Board to increase the representation of child development and public health professionals, social scientists, and parents (p. 303); and
- Maintaining attention and pressure on the Board to improve the ratings system by Congress, the FCC, and the public (pp. 293-95, 303).

The above-referenced article, submitted in this proceeding along with this letter, provides additional depth on the topics and issues listed above.

Respectfully submitted,



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