

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

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

**Reply Comments of  
National Religious Broadcasters**

National Religious Broadcasters (“NRB”) hereby files reply comments in the above-captioned matter.

NRB is an association of Christian communicators and broadcasters, including television stations and video content producers, whose member organizations represent millions of listeners, viewers, and readers. Our mission is to advance biblical truth, to promote media excellence, and to defend free speech.

As fellow broadcasters, NRB is particularly sensitive to the First Amendment concerns raised by the National Association of Broadcasters (NAB) in its joint comments with NCTA – The Internet & Television Association (NCTA) and the Motion Picture Association of America (MPAA). In that same vein, we are also grateful that NAB, NCTA, and MPAA noted that religious programming is among those areas not typically rated under the TV Parental Guidelines. Industry – never mind the government – is wise not to assign such a rating based on a program’s religious teaching or related content.

NRB is also wary of any move to increase regulations that end up offering much more burden than real benefit. Such has happened in other cases, including the current well-intentioned, but ultimately counter-productive “Kid-Vid” reporting regime.

All that said, reports on the current status of the use and oversight of the TV Parental Guidelines presented by Focus on the Family, Concerned Women for America, Parents

Television Council, and many other commenters are not to be ignored. Parents Television Council, particularly, offers disturbing detail about the increasing quantity and intensity of violent, sexual, and profane programming. Such a deteriorating media climate is worth serious reflection by cultural and industry leaders in its own right, but it is even more concerning when such hazardous content appears to be rated incorrectly, inconsistently, and in a manner that seems to concerned parties to lack transparency and accountability.

NRB members have an interest in preserving the quality and decency of content that is broadcast, particularly during children's viewing hours. Our broadcast stations and program producers swim in the same waters as all other broadcasters. If parents and families, perhaps disgusted by lowered decency standards or feeling betrayed by inaccurate parental guidelines, abandon television broadcasting as a reliable source of family-friendly information and entertainment, then our member stations may suffer. Beyond that, a diminishing of the civility and decency of discourse and imagery, particularly during children's' viewing hours, harms families, children, and our society.

NAB, NCTA, and MPAA are right to point out that the TV Parental Guidelines are one aid among a collection of strategies in the toolbox of parents, who are ultimately in the place of authority to oversee the media consumption of their own children. However, other commenters are right to emphasize the need for a guidelines system that does what it says it will by providing parents with an understandable and reliable system to help them in their media monitoring mission.

The record in this proceeding appears to reveal a disconnect between major industry leaders who produce and distribute content and parental voices who wish to navigate content offerings as truly informed consumers. One data point that may helpful here is located in the Hart Research Associates report included in NAB, NCTA, and MPAA's joint comment. According to this report, less than half (48 percent) of parents it surveyed say they "understand very well" the TV content ratings system. While awareness of and favorability towards ratings may well be

high, research provided by NAB, NCTA, and MPAA seems to suggest that at the very least there are many parents who have questions about how those ratings are assigned, overseen, or best utilized by parents.

Industry leaders point out their investment in engaging parents, and that should be welcomed. However, industry leaders should also take note of substantiated concerns in this record and not shy away from taking definitive steps to improve transparency and accountability in the work of the TV Parental Guidelines Oversight Monitoring Board.

NRB is very grateful for the comment of U.S. Senator James Lankford, who highlights First Amendment guardrails but also seeks to enhance the integrity, accuracy, and transparency of the ratings system. Senator Lankford also notably raises the issue of commercials, which often may contain violence, sexual matter, and offensive language that is far out of step with the programming in which it is inserted. We believe industry leaders would do well to consider taking steps to ensure advertising does not pollute what is offered to the public as family-friendly entertainment.

Indeed, NRB believes there is generally a need in the video marketplace for more family-friendly and spiritually uplifting programming. In a 2016 proceeding, INSP made this point well:

Television content has continued to grow increasingly violent and coarse, with programming today routinely laced with nudity, profanity, gore and/or crassness that could not have been imagined 25 years ago. Research consistently has demonstrated that such programming does not represent the values or preferences of tens of millions of American viewers, who are entitled to have a source of family-friendly, wholesome viewing that better reflects their moral compass. This research has been confirmed by INSP's experience, with substantial ratings growth and one of the highest viewer loyalty and repeat viewership rankings of any network today.<sup>1</sup>

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<sup>1</sup> See Comments of INSP, LLC in MB Docket No. 16-41, at p. 9 (March 30, 2016).

Unfortunately, many industry giants are either not aware of or not sufficiently attentive to this need. NRB would be pleased if the conversation generated by this review of the TV Parental Guidelines would result in more attention from industry leaders to the value of faith and family programming as they pursue their mission to serve communities across the United States.

Dated this 19<sup>th</sup> day of March, 2019

Respectfully submitted:

National Religious Broadcasters, by:

Aaron Mercer,  
Vice President of Government Relations  
National Religious Broadcasters  
660 North Capitol Street NW  
Suite 210  
Washington, DC 20001