

Andrea Simon
Senior Vice President
Deputy General Counsel



March 26, 2019

Via email: rodkovel@juno.com

Re: Ratings for a film exhibited on SHOWTIME

Showtime Networks Inc.

A CBS COMPANY

1633 Broadway
New York, NY 10019
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andrea.simon@showtime.net

Dear Mr. Kovel:

Thank you for your December 2017 email to the TV Parental Guidelines Monitoring Board concerning a "late-night" film, "The Submission of Emma Marx 3" (the "**Film**"), that you viewed on a channel of SHOWTIME in the middle of the night. At the outset, please note that your email was forwarded to Showtime Networks Inc. ("**SNI**") only last week, so we apologize for what must seem like a much delayed response to your email.

Your email asserts that SNI isn't "doing enough to let parents block out porn" because SNI assigned a TV-MA rating to the Film, which is the same TV Parental Guidelines Rating that is assigned to television programs that you believe are more acceptable to teenagers.

As you likely know, under the TV Parental Guidelines rating system, the "audience" ratings are designed to broadly indicate the age or audience for which a program is intended. SNI gave the Film the most restrictive rating, TV-MA, which denotes a program specifically designed to be viewed by mature audiences, and which may be unsuitable for children under 17. SNI provided additional "content" ratings to enable consumers to understand why the Film was rated TV-MA. In this case, we assigned the letters D (suggestive dialogue), L (strong coarse language), and S (intense sexual situations) to the Film.

Not only do we use the TV Parental Guidelines ratings, we also use a system of Advisories that SNI and HBO developed years ago, to provide even more nuanced information. As a premium network, we offer a wide range of programs to viewers who have specifically elected to subscribe to our network. In light of this wide range of programming, we believe we have a special responsibility to give our viewers thorough information about each program. In addition to the TV Parental Guidelines "audience" and "content" ratings, the Film carried these premium television advisories: Adult Language (AL), Nudity (N), Adult Content (AC), and Strong Sexual Content (SC), Viewer Discretion Advised. And, as you noticed, the Film is scheduled on our linear channels for viewing only between the hours of 12:00am and 4:00 am E/P.

We hope this letter demonstrates how conscientious we are about evaluating and rating the programs we exhibit. Providing our subscribers with accurate information about our programs helps them make informed viewing decisions for themselves and their children, and the use of on-air ratings is one of the ways by which we educate our viewers. We hope this letter addresses your concerns, and thank you again for sharing them with us.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Andrea', is written over a horizontal line.

Andrea Simon