

June 21, 2018

The Honorable Ajit Pai
Federal Communications Commission
445 12th Street, SW,
Washington, DC 20554

Dear Chairman Pai

On behalf of our organizations, **we write to express our support of the Modernization of Media Regulation Initiative** to update obsolete Federal Communications Commission (FCC) “Kid Vid” rules on children's television programming.

In 1990, the Children's Television Act (CTA) became law, and simply required broadcasters to show educational and informational programming for children. It had no mention of hourly quotas or restrictions on broadcasters and children's educational programming. Since its passage, however, the FCC has broadly interpreted its ability to micromanage broadcaster content for children.

Broadcasters should have more flexibility in organizing their schedules for children's TV shows. The current regulations on broadcasters control the length of educational content. While some messages and programs for certain age groups are better suited for 15 minutes, others might be better suited for 30 or 45 minutes. These restrictions block modern versions of the still popular educational short animated skits from Schoolhouse Rock!, like “I’m Just a Bill,” and special programming, such as the “ABC Afterschool Specials.” Both would be unacceptable under Kid Vid. Broadcasters should have more discretion in the timing, length, and content of children’s programming.

The FCC Kid Vid rules require broadcasters to submit mountains of paperwork detailing their programming schedules, the objectives of the programming, and the target child audience. The program run-time is restricted and, once submitted, the schedules cannot vary.

The FCC’s Kid Vid rules do not contemplate the vast amount of children’s programming that is now available. There have been significant changes since the 90s, particularly in terms of access to new content delivery platforms. In previous decades, broadcasters were the primary access point, but now the vast majority of American households have more options. According to Nielsen, there are only 2.5% of households without cable or internet access in the home.¹ Of those homes, only 20% have a child between the ages of two and 17.² That leaves **only .5% of households with children that don’t have cable or internet in the home, but individuals in these homes may be accessing content like the PBS app on their wireless devices.**

¹ This does not include the possibility of wireless access.

² These numbers were based on average day for Nielsen’s National Panel between the dates 04/26/18 - 05/23/18

In terms of content, there are many cable tv stations dedicated to children's programming. Parents have access to streaming services, like Netflix, Hulu, and HBO Go, to watch children's educational content on demand with their families on any device anywhere.

Easing these regulations does not mean the end of children's broadcast programming; rather, it enables broadcasters to enhance the quality of children's programming to match their competitors.

The initial law did not require the restrictions that have since been imposed on broadcasters. **We support easing broadcaster regulations to match the contemporary children's programming environment.**

Regards,

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