

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Children’s Television Programming Rules</b>	)	<b>MB Docket No. 18-202</b>
	)	
<b>Modernization of Media Regulation Initiative</b>	)	<b>MB Docket No. 17-105</b>
	)	

**COMMENTS OF SESAME WORKSHOP**

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sesameworkshop.  
The nonprofit educational organization  
behind Sesame Street and so much more

## Introduction

Sesame Workshop, the nonprofit organization which produces *Sesame Street*, and many highly effective educational programs for children in the United States and across the globe, appreciates the opportunity to comment on the NPRM focusing on the so called “Kid-Vid” rules. We agree with the FCC’s stated interest in seeking to modernize and make more efficient the implementation of the Children’s Television Act (CTA) of 1990. While the proposals put forward do not directly impact the work and activities of Sesame Workshop as a nonprofit educational media content producer, we are concerned that the proposed rule changes could undermine the critical goal and intent of the CTA-- to ensure access to high quality educational media designed to help children become effective citizens in the Information Age.

The modernization of the CTA is a worthy goal. Indeed, the body of research on the potential impact of media to educate and inspire, and our national commitment to provide leadership in a global economy, demand that today’s children gain additional exposure to rich, multi-media educational platforms. However, new rulemaking must be done with one vital strategic purpose: to ensure that all children, especially those who have been traditionally underserved, will gain access to high quality educational programming. In our judgment, the proposed rule changes do not yet pass muster as a vital, evidence-based remedy towards meeting that goal. In fact, the proposed changes may represent a step back from that laudable goal, which is even more relevant than it was in 1990.

Rather than simply reducing the overall amount and viewer accessibility to children’s educational content on broadcast TV, we offer the following alternative recommendations for consideration as the FCC moves forward in this proceeding. In summary, we suggest that the Commission, in conjunction with the Legislative and Executive branches, advance three key priorities in modernizing the implementation and enhancing the impact of the CTA:

- 1) Build a New Vision for a Modern Legislative Framework
- 2) Establish Best Practices for Producers of Educational Content
- 3) Promote New Community Partnerships to Ensure Equal Opportunity

## Background

Nearly 50 years ago, *Sesame Street* was created to help disadvantaged preschoolers prepare for school. Through the use of the most influential medium of the day – television -- *Sesame Street* revolutionized early-childhood education, helping generations of youngsters learn their ABCs and numbers as well as social-emotional skills, healthy habits, and an appreciation of the Arts. Our track-record of success is unparalleled in the educational media field. The first evaluations of the program indicated that children who were exposed to *Sesame Street* scored higher on letter, number and classification tests than non-viewers. The more children viewed, the greater their knowledge.<sup>1</sup> Longitudinal studies have also shown that children who were frequent *Sesame Street* viewers at age two scored higher on standardized tests of school readiness in kindergarten than less-frequent or non-viewers<sup>2</sup> and that frequent *Sesame Street* viewing in preschool is associated with higher high school grade point averages even when controlling for several demographic factors.<sup>3</sup> Similarly, researchers have also found that children who view *Sesame Street* segments which focus on pro-social content had the highest level of pro-social behaviors during planned and structured activities and were lowest in anti-social behaviors during free play.<sup>4</sup> Over time *Sesame Street* has evolved and grown to become what is now considered the “longest street” in the world of children’s learning: we reach some 150 million users in over 150 countries. Fifty years after the Workshop was created, we are also proud to have been recently named by *Fast Company* as one of the world’s most innovative companies, and to have been the recipients of the MacArthur Foundation’s \$100 million grant to help transform the lives of some of the world’s most vulnerable children, those who have been displaced by the enduring, tragic

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<sup>1</sup> S. Ball and G.A. Bogatz. “The First Year of Sesame Street: An Evaluation” (Princeton, NJ: Educational Testing Service, 1970). S. Ball; G.A. Bogatz. “The Second Year of Sesame Street: A Continuing Evaluation” (Princeton: Educational Testing Service, 1971).

<sup>2</sup> J.C Wright et al. “The Early Window Project: *Sesame Street* Prepares Children for School.” In “*G* is for *Growing*”: *Thirty Years of Research on Sesame Street*. ed. S. Fisch and R. Truglio (Mahwah: Erlbaum, 2001), 97-114.

<sup>3</sup> A.C. Huston, et al. “Sesame Viewers as Adolescents: The Recontact Study,” “*G* is for *Growing*”: *Thirty Years of Sesame Street Research* (Mahway: Erlbaum), 131-143.

<sup>4</sup> I.E. Zielinska and B Chambers. “Using Group Viewing of Television to Teach Preschool Children Social Skills.” *Journal of Educational Television*. 21 (1995): (2), 85-99.



conflict in Syria<sup>5</sup>. Our mission remains true: to help every child grow smarter, stronger and kinder.

### **Building a New Vision for the CTA**

As the FCC has properly noted, children’s media experiences have evolved dramatically since the passage of the CTA: they are now engaging with programs not only on a television set, but across multiple platforms, anytime and anywhere. A major priority of the CTA was to expand educational opportunities for children: it requires that programming be “specifically designed to serve the educational and informational needs of children, including the child’s intellectual/cognitive or social/emotional needs.” In the nearly three decades since the Act was passed, these needs have grown ever more complex. Effectively building children’s educational capabilities is perhaps the most valuable asset our nation has in maintaining leadership in the global and digital economy. Unfortunately, despite notable education reform efforts and the introduction of new technologies to advance innovation, productivity and lifelong learning, US student achievement is currently lagging in international comparisons.<sup>6</sup>

Building a new vision and framework for a modernized and more effective CTA thus needs to be the FCC’s national priority. We agree with the FCC and educational experts that have questioned and critiqued the effectiveness of the CTA, as currently implemented and enforced, in promoting the delivery of potent educational programming.<sup>7</sup> We also agree that new modes of delivery, including the introduction of shorter form content, and modifications in rules governing the “overall dose” that will have likely impact must be considered. We are concerned that with the changes proposed in the NPRM, the Commission is acting prematurely and without a “master

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<sup>5</sup> MacArthur Foundation. (December 2017) “Sesame Workshop & International Rescue Committee Awarded \$100 Million for Early Childhood Education of Syrian Refugees” available at: <https://www.macfound.org/press/press-releases/sesame-workshop-and-international-rescue-committee-awarded-100-million-early-childhood-education-syrian-refugees/>

<sup>6</sup> Provasnik, S., Malley, L., Stephens, M., Landeros, K., Perkins, R., and Tang, J.H. (2016). “Highlights From TIMSS and TIMSS Advanced 2015: Mathematics and Science Achievement of U.S. Students in Grades 4 and 8” and in Advanced Courses at the End of High School in an International Context (NCES 2017-002).

<sup>7</sup> Common Sense Media et al. Letter to FCC on MB Docket No. 18-202. (June 29, 2018) Available at <https://ecfsapi.fcc.gov/file/10629207618752/FCC%20CTA%20Letter%206.29.18.pdf>



plan” for addressing the critical need for access to quality educational offerings across the many ways in which media is being consumed today. The Commission first needs to do that work and engage in further due diligence before promulgating standalone changes that do not necessarily support the overall goal of this broader national priority.

Stated simply, rather than rolling back existing standards and reporting requirements, we need a new national vision and blueprint for success. While we agree that the Act, as currently implemented and enforced, has not resulted in the delivery of, with notable exceptions, the highest quality educational and informational programming for children, we do not believe that the most critical modifications of the rules outlined in the NPRM (such as the proposals to permit Core Programming that is less than 30 minutes or less than three hours a week, or to allow Core Programming to be broadcast on multicast feeds) absent a reconsideration of the original goals of the CTA to advance educational choice for all families-- are either timely or strategic. We therefore urge the Commission to delay any substantive changes in the “Kid Vid” rules until and unless they are an instrument of our shared national commitment to excellence in education.

We believe the FCC should work with the Congress and members of the Executive Branch to build support for a modernized “Children’s Television Act” that recognizes today’s multi-platform world and addresses the challenges in closing educational gaps and promoting equitable digital opportunities. The NPRM recommendations to modernize the CTA should be put on hold while the broader research and strategic thinking proceed and a comprehensive plan is conceived and put in place to inform appropriate policy action.

### **Educational Outcomes for Media Producers Are Needed**

As the FCC has noted in the NPRM, twenty years after the CTA was conceived the landscape for children’s learning has shifted: media today are a ubiquitous element of children’s lives.

Children are not only watching the television screen in the living room, but they are engaging with multiple screens. “Television,” in its derivative and more interactive forms, is now available anytime, anywhere. In 98 percent of homes with children today there is a mobile device such as a tablet or smartphone. That is a 52 percent increase from just six years ago. In



fact, mobile devices are now just as common as televisions in family homes.<sup>8</sup> The overall time children are spending with media has not increased substantially since 2011 - children ages eight and under are still spending from 2-3 hours a day with television, computers and video games – what has changed is how they are using it.<sup>9</sup> Older children--those 8- to 12-year-olds, are also expanding their time on mobile devices—they now average spending about six hours a day with media for recreational purposes including television, computers, video games and smart phones. And on any given day, American teenagers average about nine hours of entertainment media use, excluding time spent at school or for homework.<sup>10</sup>

While the delivery of children’s media has changed dramatically since the creation of *Sesame Street*, the educational impact of the newer commercial offerings has not yet made a consistent, demonstrable, systemic impact. This is an area of great concern. Since the passage of the CTA, we have learned much more about the circumstances under which young children can use educational media to maximum benefit.<sup>11</sup> For example, curriculum-based, educational offerings such as *Sesame Street* and high quality programs offered by PBS and some commercial cable providers, have been consistently found to enhance academic and social skills. As younger and younger children participate in the pervasive media culture, researchers are analyzing the best ways to deploy digital media to have a greater impact on learning and development. Research conducted by Sesame Workshop, and its affiliated organization--the Joan Ganz Cooney Center--and across many independent academic institutions, indicates that the television and digital media environment does have a lasting impact on educational and health outcomes.<sup>12</sup>

Research on the use of digital media, such as apps and games have also identified an emerging set of best practices and standards that are now codified in professional guidance from organizations such as the American Academy of Pediatrics and the National Association for the

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<sup>8</sup> Rideout V. “The Common Sense Census: Media Use Kids Zero to Eight.” (2017): 13-16.

<sup>9</sup> Ibid

<sup>10</sup> Rideout V. “The Common Sense Census: Media Use in Tweens and Teens” (2017): 19-26

<sup>11</sup> Yip, J., Levine M.H., Lauricella A and Wartella E. “Early Learning and Healthy Development in a Digital Age” in the SAGE Handbook of Early Childhood Research. (Sage UK, 2016)

<sup>12</sup> Guernsey L. and Levine M.H. “Tap, Click, Read: Growing Readers in a World of Screens.” (Jossey-Bass, September 2015)





Education of Young Children.<sup>13,14</sup> However, the policies and regulations flowing from the CTA are not yet designed to make use of the contemporary knowledge base.<sup>15</sup> To move ahead, we need to know even more about how the newly created innovations in media and technology impact children's learning. That is why we are encouraged by the recent introduction of bipartisan legislation: The Children and Media Research Advancement Act (CAMRA), to authorize an R&D program to study the health and developmental effects of media and technology on infants, children, and adolescents.

Any modifications in the FCC "Kid-Vid" rules must provide for broad access to high quality, curriculum-driven educational media offerings as part of an overall plan. We remain committed to that fundamental and overarching goal. The Commission should use the current NPRM process to gain balanced scientific advice on how to establish consistent, coherent and enforceable guidelines for content delivery. These guidelines must be directly aligned with educational research which will inform the appropriate format, frequency and learning goals of the required programming. A more clearly enunciated set of expected outcomes resulting from this inquiry will also allow more flexibility in content delivery and public reporting.

### **Community-Partnerships to Promote Equal Opportunity and Inclusion**

Modernizing the CTA and leveraging other FCC priorities, including national broadband programs like Lifeline should be more closely connected. According to Common Sense Media's recent national survey of media use by young children, there is increasing viewing among low-income families of both television and increased ownership of mobile devices and software. Despite the prevalence of new media platforms, devices and content consumption in low-income

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<sup>13</sup> National Association for the Education of Young Children and the Fred Rogers Center for Early Learning and Children's Media at Saint Vincent College. "Policy Statement: Technology and Interactive Media as Tools in Early Childhood Programs Serving Children from Birth through Age 8" (Jan 2012) Available at:

[https://www.naeyc.org/sites/default/files/globally-shared/downloads/PDFs/resources/topics/PS\\_technology\\_WEB.pdf](https://www.naeyc.org/sites/default/files/globally-shared/downloads/PDFs/resources/topics/PS_technology_WEB.pdf)

<sup>14</sup> American Academy of Pediatrics. "Policy Statement: Media and Young Minds." (November 16) Available at: <http://pediatrics.aappublications.org/content/pediatrics/138/5/e20162591.full.pdf>

<sup>15</sup> Katz, V.S. and Levine, M.H. "Connecting to Learn: Promoting Digital Equity for America's Hispanic Families." (2015)



homes, according to research conducted at Rutgers University and Sesame Workshop's Joan Ganz Cooney Center, there are millions of families with pre-school and school age children who do not have regular access to high speed broadband on devices that will optimize learning.<sup>16,17</sup> There are still 6.5 million students who are not connected in schools.<sup>18</sup> Over 1 in 5 low-income Hispanic families have mobile only access at home and over 40% of rural adults do not have home access to broadband.<sup>19</sup> In sum, low-income, immigrant and rural families still experience significant access restrictions<sup>20</sup> and require robust educational programs and quality instruction, beginning in the early years to ensure that their educational pathways will be secure.<sup>21</sup> The absence of a coherent policy to encourage family use of broadband for learning and full economic participation make the delivery of high quality educational video even more critical to ensure equal opportunity and inclusion of all Americans.

As such, we urge the FCC to continue to devise a policy framework in which every available communications technology and broadcast medium is deployed as a critical tool in improving educational access and outcomes. Sesame Workshop believes that the NPRM should reaffirm and reassert the core goal and driver of the CTA: to ensure that our nation's most vulnerable families gain access to quality experiences. Future modernization of the CTA and modification to FCC rules therefore should prioritize partnerships with curriculum-based content creators and with community organizations, in order to improve the quality and accessibility of program delivery to parents, families and educators.

The approach to universal distribution and community engagement that our organization and PBS member stations use suggest one approach to providing equal opportunity that the Commission may find helpful in establishing new guidance to commercial broadcasters. Since its inception, Sesame Workshop has worked with a variety of partners – educational leaders,

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<sup>16</sup> Ibid

<sup>17</sup> Rideout, V. "The Common Sense Census: Media Use Kids Zero to Eight." (2017): 29-32.

<sup>18</sup> Education Super Highway. "State of the States: Fulfilling Our Promise to America's Students." (September 2017)

<sup>19</sup> Pew Survey Jan 2018: <http://www.pewinternet.org/fact-sheet/internet-broadband/>

<sup>20</sup> Rideout, V. J. & Katz, V.S. "Opportunity for all? Technology and learning in lower-income families." A report of the Families and Media Project. New York: The Joan Ganz Cooney Center at Sesame Workshop (2016)

<sup>21</sup> Guernsey L and Levine M.H. "Tap, Click, Read: Growing Readers in a World of Screens." (Jossey-Bass, September 2015)





developmental psychologists and learning scientists, children’s health and brain development experts, technology companies, and national professional associations, among others – to help with the creation and distribution of effective, engaging content to children and families. In addition to television distribution of *Sesame Street*, we have made our curriculum-based multimedia materials available to vulnerable communities through over 16 million “outreach kits” and events, spanning issues such as the deployment and re-entry of military families to the promotion of healthy eating and nutritional habits for all children.

Drawing from our work and the successful exemplars of other high quality media producers, we believe that philanthropic leaders, working closely with the FCC, Congress and a research body such as the National Academy of Sciences should establish a public-private partnership similar to the Commission on Educational Television which was established in 1965 by the Carnegie Corporation of New York. Unlike the original Commission--which focused only on the development of noncommercial television options-- the new group would take on many of the issues raised in the FCC’s proposed NPRM—and focus solely on children’s media forms. Its goal would be to develop a plan for leveraging the power of the both the commercial and non-commercial airwaves to promote educational opportunity in our digital age.

## Conclusion

Nearly five decades since the beginning of the educational media field pioneered by *Sesame Street* and nearly three decades after the CTA was passed, our nation needs a rededication to answering critical questions about the quantity and quality of educational programming that is currently available for the most at risk families; the ability of parents to find reliable and low-cost educational programming and other useful information; and the conditions under which the deployment of new digital technologies will better drive educational choices. As the FCC and Members of Congress examine the changing children’s media landscape, there are several critical issues to explore of compelling national interest, beginning with a re-examination of the Children’s Television Act.



We therefore urge the Commission to delay the implementation of the NPRM in order to lead a broader, timely examination of the issues raised here. As an established leader and pioneer in the early learning field for nearly five decades, Sesame Workshop stands ready to serve the Commission and the Congress in sharing our expertise, experience and commitment to public service media to help all children grow smarter, stronger and kinder.

Respectfully submitted,

By:

  
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Sept 24 2018


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