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**National
Coalition on
Television
Violence**

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Dear Commissioners:

The National Coalition on Television Violence is happy to submit comments "In the Matter of Policies and Rules Concerning Children's Television Programming, Docket Number MM 93-48.

This is an important issue which needs to be addressed and a problem whose solution is long over due.

Questions concerning our position can be addressed to Dr. Robert Gould, in the New York office, or to me, in our Washington, D.C. office.

Again, we thank you for dealing with this problem.

Sincerely,



Mary Ann Banta
Vice President

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FEDERAL COMMUNICATIONS COMMISSION

IN THE MATTER OF POLICIES AND RULES CONCERNING CHILDREN'S
TELEVISION PROGRAMMING

MM Docket No 93-48

Comments From THE NATIONAL COALITION ON TELEVISION VIOLENCE

INTRODUCTION

The question of children's television is complicated. It touches on child development, sociology, education, and the family. It raises questions of artistic freedom and asks what is the difference between education and entertainment. It is as much a political, legal and economic issue as it is a educational or child developmental question.

STATEMENT OF THE PROBLEM

The National Coalition on Television Violence has long stood for the decrease in violence both on children's television and during prime time. NCTV holds the position that the viewing of violence, gratuitous violence, has negative effects on the viewer, be they adult or child. An overwhelming amount of research pointing in this direction has been amassed since the early 1950's.

Yet, in spite of this evidence, even children have not been spared the constant bombardment of television violence. Cartoons, with children as their target audience, constantly contain more violence than prime time programming. The recently released study "The UCLA Television Violence Monitoring Report" (1995) confirms the years of monitoring conducted by NCTV. It is specifically pointed out that:

It is true that people rarely die on Saturday morning, but it is not true that they rarely fight...It is ironic that programming geared largely to adults, prime time, is showing promising signs in regard to violence, while that created especially for children continues to have serious problems. (p. 153)

The children's television issue is exacerbated by two problems. First there is the developmental question: At what age is a person able to distinguish between reality and fantasy? Second, there is the very breadth of the population included in the word "child". A child can mean anyone from toddler to mid-teen. A rather disturbing third problem has arisen. Apparently, local stations are having a difficult time identifying, to the satisfaction of media activists and other thinking people, just what is meant by the terms "educational" and "informational" as used in the Children's Television Act of 1990.

DISCUSSION

We must begin any discussion of television, be it children's television, or television in general, with the generally unknown fact that, in exchange for the **free and exclusive** use of a valuable part of the public domain, a local broadcast television station is obligated to serve the needs and interests of those people living in the area. In the Children's Television Act of 1990 broadcasters were mandated to serve the educational and informational needs of children. If stations were living up to their license requirements, the Children's Television Act would be redundant. Yet, in spite of the license requirement and The Children's Television Act, television for children is a "vast waste land" or worse, it is a school for violence.

The Federal Communication Commission must act in behalf of children. In mandating programming for children, it is necessary to narrow the focus. It is not enough to have "children's programming." The programming must be "age specific." At present, the word child or children includes everyone from the toddler learning to walk to the teen learning to drive. Only a -broad--castor, would find that an acceptable age range. The concept of target audience is not a new one for broadcasters. In casting their "broad" net, children's programming is not age specific. It is exactly the opposite. It is intended to attract as large an audience as possible. Programming for children must be aimed at age specific audiences, i.e. pre-school children aged 3 to 6; early elementary children 6 to 9; middle school children 9 to 12 and finally, young adolescents. It is easy to identify programs aimed at the young child. Mr. Rogers, Sesame Street and Barney come immediately to mind. None of these programs appear on "broadcast" television. The size of the audience is just too small. Yet, Power Rangers, X-Men and G.I. Joe appeal not just to the young child but to the older ones also, making this type of programming appealing to a broader range, therefore more suitable for "broadcast television." Without the F.C.C. requiring suitable age specific programming for children, the needs of children will not be met.

In requiring local television license holders to meet the age specific needs of the children in their community, the myth that very young children know the difference between reality and fantasy will be addressed. With age specific television, broadcasters will be freed from the necessity of holding the ridiculous position that even very young children know the difference between cartoon and real life action.

Finally, the sad fact that the concepts of "educational" and "informational" appear to be unintelligible by numerous broadcast licensees is disturbing and, in fact, shocking. No one questions the fact that we are moving, or have moved, into the Information Society. The thought that a large segment of those who hold license to bring that society into our homes think and act on the fact that "Sonic the Hedgehog", "Bugs Bunny" and even "Yogi Bear" are purveyors of education and information should be as frightening to the Commissioners of the F.C.C. as it is The National Coalition on Television Violence. Broadcasters are choosing fat profits over informed children. The fact that the F.C.C. accepts it is disgraceful. By their actions local broadcasters have indicated that many communities cannot trust important decisions to be made without help. Rules must be made to control such abuse. One can also only conclude that local broadcasters are in need of a lot of help in the area of defining and identifying "educational" and "informational".

It is right and just that our children are given as much information as they are able to absorb. It can and should be available through broadcast television. It is a sign of respect to speak to a person with honesty and at a level that denotes that his/her intelligence is honored.

RECOMMENDATIONS

1. The Federal Communications Commission require that broadcasters holding licenses serve the interest of children.
2. That licensees broadcast age specific programming for children in each developmental category.
3. That the programming be informational and educational and that before a program is so designated that the licensee consult with local experts in the area.
4. That programs for each age group be regularly scheduled, during times that children are watching.