

# ROBERT S. BLOCK

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Friday, May 30, 1997

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Federal Communications Commission  
1919 M. Street N.W.  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: CS Docket 97-55:

Please find attached nine (9) copies of my surreply comments in connection with the Industry Proposal for Rating Video Programming.

I am interested in testifying in person at the En Banc Hearing scheduled for June 20, 1997. Please let advise me concerning the procedures required for my participation.

Sincerely,

Robert S. Block

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Washington, D.C. 20554

Re: CS Docket No. 97-55

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Surreply comments of Robert S. Block:

In my initial comments in this docket, I pointed out that there are many reasons to label TV programs in addition to those related to blocking or not blocking programs for children. I further encouraged, the Commission to consider how their decision will effect digital TV. The decision is likely to influence labeling in other media as well.

The suggestion of the Consumer Electronics Manufacturers Association (CEMA) that a single rating system be adopted reinforces my concern that this subject is being viewed too narrowly. Certainly a technical standard is required to permit TV set makers to build sets which respond properly to broadcaster transmissions. That standard, however, should support multiple labeling (rating) approaches and changing labeling approaches. It can, if it is designed to do so. In fact, labeling control software could be downloaded to TV sets along with the programs, eliminating most limitations altogether.

CEMA appears to believe that the use of line 21 and only line 21 is a foregone conclusion. And that blocking or not blocking a program are the only choices. I hope not. In my opinion, the system approved by the Commission should be able to read more than one line, if more than one line of data is transmitted. That is not a technical hurdle manufacturers should find difficult or expensive. The approved system should also provide for substitution of audio and/or video or the selection of an acceptable program version when such services are provided. It should also support display of the label, and details about the program, at the viewer's direction.

I concur with OKTV's position that multiple TV rating systems can, and should, be implemented within a single technical standard. The Commission may find the Industry Proposal an acceptable "minimum standard" for rating programs, or, pursuant to PBS, find it "provisionally acceptable." In any event the Commission should not approve the Industry Proposal as *the* standard and then approve a technology standard which is *limited* to this approach.

To the contrary, the Commission should encourage broadcasters and programmers to provide viewers with more information about programs and program content. That position should be clear in the Commission's decision in this docket. A label control technology standard should then be establish which allows more comprehensive approaches. Given the opportunity, over time, the market will support the most useful and meaningful solutions. It is important that both the labeling procedures and technical standard allow implementation of labeling that is both used and useful and is not limited by current proposals.

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Submitted by:

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