

CS 97-55

IN THE MATTER OF: The new television ratings system

COMMENTS OF: Tara R. Wood
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APR 22 1997

Federal Communications Commission
Office of Secretary

COMMENTS: Although the television ratings system has only been in effect for less than two months, I would like to comment on my assessment of the system. It is my opinion that the television ratings inadequately inform the viewer of a program's content. There are several reasons why I take this position; 1) the rating for each program is only briefly shown during the opening credits, or in the case of a show longer than thirty minutes, flashed at thirty minute intervals 2) the ratings are too general 3) they are inconsistent both within and between the networks and 4) the ratings do not inform the viewer why a particular program has received its rating.

I have personally missed seeing about half of the ratings displayed because of how they are shown. The credits of a program are rarely, if ever, watched with complete attention. During this time, snacks are prepared, family members talk, and time is taken to "get comfortable". The viewer knows that nothing important to the outcome of the program is going to occur during the credits, so little attention is given to them. However, this is the time that most ratings are displayed. Further, by the time that it is realized that something just appeared in the upper left hand corner of the screen, the rating has disappeared. The ratings do not stay on the screen long enough to be seen and processed. There are several solutions to this problem. One solution would be to display the rating longer at the beginning, perhaps for the first minute of the program. Another solution would be to display the rating after each return from a commercial break. Like the transparent network logos that are often shown continuously during a program in the lower corner of the screen, so too could a similar transparent rating be

displayed continuously on the screen. These are just three examples of how to improve the way the ratings are displayed.

A second problem with the current rating system is that the ratings are too general. The range of shows that can be classified within a given rating is very broad. There are some shows like NBC's "ER" that has received a PG-14 rating assumably because of the graphic content of some of the medical scenes and of the more complex story line. On February 11, FOX aired "True Lies" which also received a PG-14 rating. However, "True Lies" contained much more sexual content and violence than other programs, such as "ER", that have the same PG-14 rating. Both shows deserve a rating higher than PG. Neither deserve the highest rating of PG-M. Therefore, they both received a PG-14 rating. However, both shows were not on the same content level. The viewer therefore cannot assume that the type of content will be the same within the same rating. Unfortunately, there is no way to determine a "lower-level" PG-14, such as "ER" and a "higher-level" PG-14, such as "True-Lies". The rating PG-14 encompasses too broad a spectrum. This same argument can be given of all the ratings.

One of the most frustrating aspects of the current rating system is how inconsistent it is. Sometimes it appears that the networks are arbitrarily assigning ratings to programs based on what viewers they to want to attract, not on content. One personally infuriating example of this was with the recent airing of NBC's made for television movie, "Asteroid" on February 17. This highly hyped movie which had been advertised for weeks prior during all hours of the day, received a TV-PG rating. However, the first six minutes of the movie was a series of continuous asteroids massively destroying the a city. Adults and children were seen screaming and running in fear. Others were shown being trapped, injured, and killed by falling debris and explosions. After a brief pause surveying the aftermath of the disaster, the movie continued to show children traumatized by their separation from their parents. Rows of injured and bloody bodies were frequently shown. One tragic scene showed a boy watch

his grandfather fall several stories down a collapsed hole in a building followed by a beam falling on top of his grandfathers body and killing him. The violence of the disaster and the devastation it produced was the very essence of this movie. How did this movie ever get a rating of TV-PG? As referred to earlier, "ER" is much milder in its portrayal of injuries and death. The trauma sequences it depicts are briefer and less frequent than it was in "Asteroid". Yet, "ER" often receives a TV-14 rating. Why did NBC chose to rate "Asteroid" TV-PG, but rates shows with less violence and graphic content such as "ER" TV-14? This is inconsistent.

It was disturbing to me that NBC thought its movie was appropriate for young children and did not contain inappropriate material for children under age 14. It is true that this program was shown at nine p.m., a time when most school-aged children are in bed. However, this cannot be assumed for all children, especially since this movie was aired on a holiday and for many children, during a time when they had the entire school week off. Therefore, children on this day were more likely to have been up later to watch this much publicized movie. At the very least, a warning should have been given for parental guidance, and a higher rating issued.

The networks can also chose to change the rating of a particular program from its usual rating based on the content of that particular program. A show that is usually rated TV-PG can be changed to TV-14 for a particular episode if it contains more mature content in that episode. This room for inconsistency makes it more difficult for parents to regulate their children's television viewing. They can no longer tell a child a particular program is acceptable to watch since there may be a time when it is not.

Another problem with the networks rating their own programs is the inconsistencies is causes between networks. Jay Leno's show on NBC receives a TV-14 rating while David Letterman's show on CBS receives a TV-PG. The two shows are almost identical, but receive different ratings. With the current system, a viewer cannot be certain that what was TV-PG on one station will be the same type of TV-PG on

another. There needs to be one set standard that all the networks follow so that the ratings are the same for each network.

The best way to solve these inconsistencies would be to develop a content-based system. With this system, viewers would not have to rely on the network's interpretation of the content within a given program. Instead, it would be up to the viewer to determine the rating of the program. Inconsistencies due to network interpretation and having to rate a broad spectrum of programs under a limited system would be eliminated.

However, this current rating system's greatest flaw is that it does not inform the viewer of the program's content. When a program is given a TV-PG rating suggesting parental guidance, it is not known whether this was suggested because of violent content, sexual content, or language. For me, regulating violence and sexual material is important, and complex subject matter and language is less important. Any combination of these characteristics may be present in a PG-14 program, for example. However, I have no way of determining what the show is rated for until I watch the program and have been subjected to the material I did not want myself or the children I'm with to see. The current rating system leaves the viewer in a no-win situation. They can choose to not watch anything within a given rating to avoid seeing certain material and miss out on programs that did not contain the material they were against and would have otherwise enjoyed. On the other hand, they can choose to watch all programs within a given rating and risk seeing material that they did not want to see. The viewer should not have to choose between these two options when it could be easily solved by providing content information.

Further, the networks should not decide what is appropriate for children to watch. The current age-based system allows the networks to do just that. However, this is a decision the parents should make. Only a content-based system would allow the parent, as opposed to the networks, regulate their child's television viewing.

The amount of violence, sexual content and vulgar language that is permissible on television today is appalling. There is no question that a rating system is needed for parents and viewers to chose what they want to be seen on their television screens. However, the current system is not good enough. The ratings are not easily seen, each rating covers too broad a spectrum, and there are too many inconstancies. Most importantly, there is nothing to indicate the type of content within the program. It is difficult for parents to determine what programs are acceptable for their child to watch without knowing why a given program has received its rating.

I urge you to review the current rating system and change it to a more content-based system that is standard between all of the networks. The current system is not acceptable for aiding in the regulation of children's television viewing. Of greatest concern is that *this rating system will remain the same, and as a result, the networks will be free to manipulate the ratings to best conform to their needs, not those of the viewers.* As their standards change, what they determine is acceptable for children will change. I do not want the networks determining what is acceptable for my children to watch. Their standards are very different than mine. Please enforce a system that puts the decision power into the hands of the viewer and out of the hands of the networks.

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CS 97-55

IN THE MATTER OF: The new television rating system

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Federal Communications Commission
Office of Secretary

COMMENTS:

Television ratings have been implemented in the past month. Unfortunately, I do not believe that this has made the necessary impact to better programming for children. Rather than to provide more educational, less violent television for our children; the already poor television programming is simply rated.

There are several problems with the new television rating system. First, the ratings are not obvious to the viewer- appearing only for a few seconds at the beginning of each program. Furthermore, I feel that information explaining the new rating system has not been readily available to the viewers. Finally, the ratings are not consistent between programs of similar content. Ratings can even vary between episodes of shows, creating a complex system that the viewer must explore on his/her own.

Rather than attempting to fix many of the problems with programming today, we should aim to reform the American watching patterns. Parents should be encouraged to watch and discuss television with their children. Programmers and advertisers should be required to produce educational television programs for children. With more beneficial television programs on television, children have a greater option of what to view. There is no easy fix to the television dilemma. Programmers, advertisers and parents must all take responsibility for the programming that airs on television. If everyone is dedicated to create better television programming for today's youth; shows will no longer need the rating system.

First, the new rating system was instituted over a month ago. Informed about the new system, I have been looking for the ratings. I often miss them though. The ratings have been obscure and hard to catch. Frederic Biddle points out in his Boston Globe article that “Law and Order” on NBC only aired their rating in their pre-credit sequence (“Rating the Ratings” Jan. 1, 1997 p. D1). For those who might have tuned in a few seconds late, they had already missed the rating. The ratings are only required to be shown for fifteen seconds(Biddle. “Rating the Ratings”). However, before one can even find the rating on the screen, the fifteen seconds are finished. How are the ratings supposed to be effective if no one ever sees the ratings?

The ratings are also black and white squares in the left hand corner of the screen, often showed during the credits of a show. During the credits there is an array of color and design that draws one’s eyes towards the center of the screen. People must be looking for the rating to see it. If the ratings were more brightly colored or aired in a prominent spot on the screen, they could become more effective.

Ratings should also be aired longer. As a frequent channel surfer, I must watch the opening credits to catch the rating of a certain program. It is a difficult feat to do. Even the “Rosie O’Donnell Show” on ABC did not air their rating for the full fifteen seconds. On February 18, 1997, the rating was aired for approximately eight seconds. For an actress who is concerned about improving television for television, her rating did not even last the entire required time. Each rating should be shown at the beginning of the show and after each commercial break. They could even extend the time required from fifteen seconds to thirty seconds or a minute. If the ratings are as unobtrusive as they are now, there should be no problem with airing them longer during the program. The viewer must become aware of the types of programs that they are watching if the rating system is going to be effective.

Although ratings have been active for over a month, it was not until two weeks ago that I learned what each rating meant. I saw several advertisements on ABC which informed the viewer that they might write away for a pamphlet explaining the new system. Many parents may have written away for a pamphlet, but this means that they must be watching television to catch the advertisement. Parents must also be worried enough about their children's viewing habits to put forth the effort of sending away for the pamphlet. The parents who do this are probably the most concerned of all parents. These parents are also the ones who often watch television with their children and may not need to rely on the rating system.

There were also two newspaper articles about the new television ratings in the Boston Globe. The first was in July and they outlined the ratings in detail for the reader(Biddle, Frederic. "TV Plan Unveiled; Criticism persists." July 30, 1996). This was written six months before the actual rating were aired. The article that appeared in January after the ratings begun to be aired, only contained the rating and their age group with no explanation of the ratings(Biddle. "Rating the Ratings" Jan. 3, 1997 p.D1). For example, TV-M stands for mature audiences only(Jan 3. 1997). It mentioned nothing of what the content might include. This leaves it up to the parents to decide what mature means. I find it difficult to believe that the newspaper did not provide a more expansive guide for parents as the ratings were beginning to be aired.

The ratings were designed to be similar to the movie ratings. However, many more parents are likely to take their children to a movie and watch it with them. If my parents were unsure if my sister and I could watch a movie, they would see it first and then make a judgment call. However, with television shows it proves to be more difficult. Parents must videotape the half-hour program, watch it and then make a judgment. If parents are that careful with what their children watch, chances are that they have their own system of rules about what their child may

or may not watch.

Parents need to have the guidelines by which the television programs are rated. Each parent has their own rules by which they monitor their children's viewing. Alerting them to the fact that they should watch a television show with their children, does not tell parents anything about the content of the program. However, if parents knew how each program was judged, it would be a better indicator as to what the parents might encounter in each program.

Finally, the rating system has been highly inconsistent. "The Late Show with David Letterman" on CBS is rated PG while "The Tonight Show with Jay Leno" is rated TV-14(Biddle. Jan. 3, 1997). This is confusing. I believe that Dave Letterman's show is as bad, if not worse than the "Tonight Show." If the specific guidelines for each show are not known, how are the parents supposed to make judgements about each program based on the rating system?

The ratings also change between the episodes of a program. This may confuse a parent who is making an attempt at getting involved in their child's viewing habits. A parent might see one episode of a program which is rated PG. The parent might assume based on that episode that it is acceptable for their children. However, the next week the show might be TV-14. If they happened to miss the opening credits, the child could be watching content which the parent may think is unacceptable.

Each program should have a regular rating based on the average of their episodes. If one episode happens to be rated higher, there could be parental warnings after each commercial break. Once parents start a viewing pattern, they can adjust to using the new rating system. The system is only effective if the parents use the ratings and know what they normally represent. While trying to create some consistency to the ratings, parents will be able to use them more readily.

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Child Study 143D
Children and Mass Media
Professor Dubrow
February 18, 1997

In the Matter of: The television ratings system under the 1996 Telecommunications Act

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Comments:

In my opinion the current television ratings system, in which categories are based upon age appropriateness, should be reevaluated in the upcoming months if it is to best serve the needs of our nation's children. The system, which was designed by select members of the television industry, is flawed in many respects. Although a formidable task, the television industry executives must make a veritable attempt to create a system which is reflective of the recommendations of both parents and children. My assessment of the system is based upon a thorough examination of rated network television programs as well as an informal discussion with children ranging in age from eleven to fifteen. I believe the system to be difficult to comprehend, often inaccurate and too consistent. Each aforementioned aspect of the ratings system should be addressed by the industry executives in order to best help parents and children make appropriate viewing decisions. An inherent obstacle to an effective ratings system is the fact that our nation is very diversified. We, as a nation, are too diverse as far as our socioeconomic levels, religious beliefs, family values and child rearing practices to regard the rating system in the same manner. This fact must be taken into account when the final decision regarding implementation is made.

Not only does a rating icon in the top left hand corner of the screen disappear after a fleeting fifteen seconds, but its exact meaning is difficult to decipher. Only a viewer who is present for the opening sequence of a half hour show is given an opportunity to view the rating. The television viewer, whether it is a parent of a child, must be sufficiently educated in the ratings system in order to differentiate one rating from another. If an individual has not received adequate information, the entire ratings system yields

confusion and misinterpretation. It is very easy to misinterpret the meaning of a given rating. As "television viewing is not a one-way experience for children," it is likely that the same will be true for the interpretation of a rating icon (Doubleday, Droege in Berry and Asamen, 1993). For instance, a young child of five might interpret a rating of TVY to indicate that "yes" he or she should watch the program. An older child who has not been adequately educated might naively believe that the same icon refers to programs that are suitable for "young adults." Some ratings contain numbers while others contain letters. It is my belief that there should exist a universal rating language. A very young viewer might assume that the rating icon of TVG refers to a "good" program for them to watch. In the absence of sufficient information regarding the system, both parent and child will not make viewing decisions that are in the best interest of the child. The aforementioned examples of confusion and misinterpretation are by no means intended to be representative of the entire population. These situations do, however, exist in homes across the nation. I believe that a child living in a home in which English is a second language will find this system difficult to decode. It is apparent after speaking informally with some adolescents that concepts that are not understood are dismissed as being of little significance to them. One thirteen year old girl explained that because she does not understand the exact meaning of each rating icon, she has learned to ignore its presence on the screen. She added that she no longer cares whether a program is considered inappropriate for her to view. Detailed information must be distributed to parents and children if the current system remains implemented. According to Karen Jaffe of KIDSNET in an article posted on the internet by the organization Children Now, "it is critical that the definitions used in the rating system are disseminated to the public, so they know what they are and what they mean. The ratings should be public in as many places as possible, so they have utility and validity" (Children Now 1996). A new set of symbols designating various categories is sure to benefit both parents and their children. If the television industry decides to retain an age based ratings system, I recommend the visual display of words rather than an icon with the abbreviated label on the television screen. For example, instead of the icon TV14 the industry should print the words "You must be over 14 years old to view." In lieu of the icon TVG, for instance, the industry should consider the use of the words "Suitable for all ages." Whether television industry executives decide that the ratings should be content based or age based, it is essential that the

ratings be as clear and concise as possible. A child and his or her parents should be able to look a rating and determine immediately the program's intended audience. The rating information should also appear at least twice during the course of a half hour show and four times during an hour long program in order to ensure that the rating is seen. It is apparent that any form of rating system must be understood before it can be effective.

The current rating system proves to be rather inaccurate after a close examination of a variety of programs over the course of a few weeks. There are certain programs that are assigned ratings that truly do not reflect the content. On a recent syndicated episode of the show "Mad About You" on the local Boston station WSBK the main characters, a newly married couple, make over fifteen references to sex and use certain slang words to describe sexual functions. There is a scene in the episode during which viewers see the couple having sexual intercourse on the floor of their apartment. They also make several references to their enjoyment in seeing each other naked. In the same episode the husband played by Paul Reiser awakes to find his wife trying to remove his pants. This episode aired at 7:30 in the evening. It is clear that parents can no longer assume that each program between the hours of seven and nine in the evening is suitable for children. This show received a rating of TVPG. I believe that this particular episode should have been rated TV14 due to the elevated level of sexual material. The rating of TVPG implies that there is a limited amount of sexual material. This is not an accurate labeling. I also chose to evaluate the ratings assigned to daytime soap operas. Every soap opera on network television contains partial nudity, sexual material and violence. According to the new ratings system, all soap operas are not given the same rating. Each NBC daytime dramas is rated TV14 while all ABC soap operas that air after 2:00 in the afternoon are rated TVPG. I spent some time watching the two PG rated soap operas in order to judge the accuracy of the rating. During the week that I watched the two dramas, namely "One Life to Live" and "General Hospital," I witnessed the presentation of content that does not merit a PG rating. For instance, in the latter drama a viewer witnesses the shooting of an innocent person, an explosion and is presented with a character who suffers from a heroin overdose. In a recent episode of the acclaimed medical drama "ER" (NBC 2/13/97) that is rated TVPG a violent hostage situation accounts for the entire hour. One of the hostages who is held at gunpoint is a young boy approximately 12 years of age. He is chased and grabbed

by the robbers of a convenient store and risks his life in an attempt to escape. A viewer who is of a similar age is likely to have been terrified, as the boy is placed in a life threatening adult situation. "Even though a child may know that a program is scripted and rehearsed, the program may be judged as realistic if the characters and events are similar to those the child would likely encounter in real life" (Fitch, Hurston & Wright in Berry and Asamen, 1993). This episode of "ER" contains the random firing of bullets by the robbers, graphic injuries from gunshot wounds and a police officer firing a shot that kills the robber. Those industry executives who rated "ER" the way that they did are naive if they believe that children are not watching this program because it airs after ten o'clock in the evening. The program is undoubtedly one of most promoted by the network and therefore arouses the curiosity of young viewers. Some ratings do not appear to have been assigned accurately. Currently, a parent does not have a way to precisely determine what is questionable about a show's content prior to the start of a program. There are those who would like a content based system similar to that shown before movies on the Home Box Office channel implemented instead. This will not be necessary if the television industry executives promise to reevaluate existing ratings to make them accurately reflect content. It is my belief, that certain shows will not be reexamined by the industry executives for fear that viewership and Nielson ratings will be impacted.

Of the shows that I examined the ratings were consistent from episode to episode. For instance, each of the ten syndicated episodes of "Mad About You" that I viewed were all rated TVPG. Based on the content of certain episodes I was surprised that a rating of TV14 never appeared. If a child becomes accustomed to viewing a particular program week after week or night after night it is unlikely that he or she will willingly part with an episode simply because it does not have a suitable rating. A parent is less likely to take note of a change in rating if every episode is assigned the same rating. I have yet to view a program that has not had a consistent rating. My fear is that television executives are trying to avoid inconsistent age appropriateness ratings in order to preserve a show's Nielsen status. Such a tactic is truly deplorable. Those television industry executives who are involved in the rating development process are committing a terrible crime, one that is directly affecting our nation's children. Their number one priority should be to closely examine each program and assign it as accurate a rating as possible. The executives are expected

to adhere to their decision to rate each episode on an individual basis rather than assign one rating that will remain for the life of the series.

The current television ratings system deserves to be closely reexamined by its designers in order to be as accurate and understandable as possible. I recommend that the symbols such as PG and M be replaced with sentences briefly stating for whom the show is intended. I also suggest that television executives avoid assigning one rating to a particular show for its entire life on television. Industry executives must not lose sight of the fact that each show must be designated a rating that is reflective of its content.

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CS 97-55

IN THE MATTER OF: The new television rating system.

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Federal Communications Commission
Office of Secretary

COMMENTS:

This letter is in reference to the new television ratings system. It's a long anticipated program which I am very glad has started to take form. The system is a great step in helping parents regulate children's television viewing.

Many people would agree that the "goal of rating television programs should be to provide parents with as much information as possible, in as simple and understandable a format as possible." (Children Now, Making TV Ratings Work for Kids and Families, 1996). But I believe that this goal isn't being completely achieved with this new system. I think the ages-based ratings aren't the best form of ratings, nor is there a standard consistency and appropriateness in the ratings of shows given by different networks, nor is there sufficient information on the new ratings system for actual viability/use.

In regard to the use of age-based ratings, I believe content-ratings would be a better system of ratings. Age-based ratings are a more generalized way of rating shows, and gives less information to parents for understanding the actual content of the show. A good analogy of this system is: "It's a bit like offering a weather forecast that says: Warning: severe weather conditions approaching. Without telling you weather to expect rain snow, wind or fog. The details aren't important: just be careful out there."- (Dale Kunkel, Why Content, Not Age of Viewers, Should Control What Children Watch on TV, *The Chronicle of Higher Education*, 1/31/97).

Many parents would rather have content-based ratings rather than age-based. In fact, two separate studies have found that about “80 percent of parents preferred the content-based, descriptive system to age based categories.” (Dale Kunkel, Why Content, Not Age of Viewers, Should Control What Children Watch on TV, The Chronicle of Higher Education, 1/31/97).

I think a content-based rating system provides parents with a much greater amount of information on a show's actual content, rather than a generalized age-based categorization. Content-based ratings allows the parents to decide for themselves, what is suitable for their kids to watch. The content ratings lets parents easily monitor for shows which might contain too much violence, sex, adult language etc., so they, themselves, can decide what is appropriate for their children to watch.

Age-based ratings, give a huge power to the networks to deem what is appropriate for certain vague age-groups to watch. “The **age-based** advisory system hides the descriptive information from the public by “filtering” it with the television industry’s judgment of what content is suitable for all children within a given age range.” (Dale Kunkel, Why Content, Not Age of Viewers, Should Control What Children Watch on TV, The Chronicle of Higher Education, 1/31/97).

The age-based ratings give the networks the power to implement a general universal morality/ respectability judgment call for the “correct amount” of violence, sex, etc. which kids in certain age groups can watch. But all families vary, so this judgment call should be left for each individual family to decide what they want their kids to watch. Providing content-based ratings rather than age-based, it will provide parents with information on the content of shows so they can decide what is appropriate for their children.

I also believe that there should be a more regulated and standardized rating of television shows. The fact that networks are regulating themselves in this new ratings system is in itself problematic. Networks rating their own shows, puts the networks in a very compromising position. They can be very biased judges, because the type of rating they choose for their own show can essentially effect their success and profits.

“Executives of NBC, CBS, ABC and Fox all said, in interviews or through spokesmen, that their **networks won’t rate** any of their series TV-M, mature audiences only, the most restrictive of the six ratings that the networks themselves devised with other industry representatives.” (F. Biddle, Stay tuned: decoding TV ratings, *Boston Globe*, 1/31/97). This shows how networks can be very tempted to under-rate their shows, in fear of losing viewers or commercial sponsors.

Also, because the networks are separately rating their own shows, there aren't any real standardized set of rules on ratings. The ratings given to shows are all left up to each separate network to decide. This leads to very similar shows, like the Late Night with David Letterman and The Tonight Show, have different ratings, only because of the different judgment calls of the different networks.

There needs to be an impartial 3rd party to regulate the ratings. If there was a single 3rd party, who did not have any stake in the ratings they give, the ratings could be more consistent and also less subject to bias.

In regard to the new television ratings system, one newspaper commented: “Parents, the labels flash by so quickly you’ll probably miss them- not that they make a whole of sense.” (Biddle, Rating the Ratings, *Boston Globe*, 12/30/96). This comment doesn’t come unfounded. I have found that many people don’t understanding the symbols in the new system, and some haven’t even noticed we have them.

There is a general lack of information being provided to the mass public explaining the program and the meanings of the ratings. Instead of trying to openly provide information to the whole public, only the few who take the time out to research what these symbols mean understand them and can use them. Having symbols not everyone can de-code or even realize are there, defeats the purpose of having television rating.

Kidset's Karen Jaffe advises "It is critical that the definitions used in the rating system are disseminated to the public, so they know what they are and what they mean. The ratings should be published in as many places as possible so they have utility and validity." (Children Now, Making TV ratings Work for Kids and Families: The Perspective of Children's Experts. (1996). There is really no use in having a rating system if we can only catch a quick glimpse at them in the beginning of the program, or if we cannot figure out what they mean.

I think it would help greatly is there was broadcasting time devoted to a quick overview on what each of the ratings symbols mean. It could also be helpful, if TV guides were required to have a decoding of the symbols published in each issue. There needs to be a huge amount of exposure for the meanings of the codes and symbols of this system, especially in the beginning of its implementations. A great deal of more publicizing on the meanings of these codes would help make the program more viable and useful to people. Otherwise people will just be confused by it, ignore it, misunderstand it, and not use it.

I hope all these comments are useful in helping revise the new television rating system, so that we can achieve completely achieve the goals of this system.

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CS 97-55

IN THE MATTER OF: The new television ratings system

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Federal Communications Commission
Office of Secretary

COMMENTS: Congratulations on taking the initiative to begin to protect children of today from the potential dangers of television. The television rating system may only be a month and a half old, but the criticism that is being placed upon it should be seen as a positive sign. People are willing to give this system a chance and are offering suggestions in order to help improve a highly debated concept. The main concern addressed in this letter has to do with the system using ratings that are age-based and not-content based. Other factors to be discussed have to do with the amount of time the ratings are shown for and when they are displayed. As of today, the ratings for a program are decided by producers and there is a cautiousness by them about which ratings may effect the number of viewers. Finally, world wide education about the ratings is a necessary step in the success of the system.

Being a student who studies both Clinical Psychology and Child Development, one thing that has been stressed time and time again is that children develop both intellectually and socially at different times in their lives. No two children are exactly the same. Therefore, "No one universal standard is appropriate for all children of the same age" (Kunkel, 1/31/97). The concept of the ratings being age-based rather than content-based has been a huge criticism of the system. Most of the most vocal opponents of this new plan are parents and educators who complain that the ratings do not provide adequate information. As Kunkel suggests, one of the six ratings may offer a warning about the show, but never gives the details about what is about to happen content wise. "A recent study by the National Parent Teacher Association found that 80 per cent of parents preferred the content-based, descriptive system to age-based categories"(Kunkel, 1/31/97). In the same article as was just cited, a survey conducted by the advocacy group Children Now, questioned leading child advocates and media researchers. Seventeen out of the eighteen surveyed said that descriptive ratings would be more useful than age-based ratings.

The current ratings are too vague and do not help parents screen out violence, sex and coarse language. "Ironically, by labeling programs with age designations rather than indicating how much violence, sex and adult language the show contains, the television industry may create a boomerang effect in which more children will end up watching the programs with sensitive content" (Kunkel, 1/31/97). As with most things having to do with children and teenagers, the more you say no, the more they are going to do it. If a child is told he/she is not permitted to view programs that are above the PG-14 rating, it is going to make the child wonder why the parent has said that. The most natural thing to do is not to listen, but to rebel. Children are curious and will often take the risk to find out the forbidden. Another reason for this "boomerang effect" is that if a parent sees that a show is rated PG, then they are allowing their 8 or 10 year old to watch. The problem with this is that most networks rate nearly two thirds of their prime time dramas and almost all sitcoms with the parental guidance suggested rating (Biddle, 1/16/97). Are eight year olds ready for the intense, gruesome and many sexual connotations of hour long programs like "ER" and "Chicago Hope"? What about the popular "Friends" with Monica and Rachel fighting in the bathroom over the last condom? Maybe some parents would find nothing wrong with this, but I know if I had kids, these would be forbidden shows. It is for reasons as was just described that parents do need to have the option of descriptive ratings. What a disappointment for a child to be told that he/she can watch shows rated PG only to sit down to watch a popular show and have a parent say no.

The television producers who are rating these shows are determining what age group is appropriate for the content of the show. "...the plan will rely solely on the program producers' judgment about the suitability of a show's content for children of different ages" (Kunkel, 1/31/97). A question that comes to my mind is, do these producers have children of their own? What is to say that they have the ultimate right to decide? Parenting styles differ extensively from family to family and even within a family itself. What is appropriate to one parent maybe inappropriate to another. "Parental values vary widely. One parent may find adult language especially offensive, another may only want to protect their child from violence and yet another may be especially concerned about sexual content. It may be that a network will assess a show as appropriate for most twelve-year-olds, but a parent with adequate information about that shows' content may find it inappropriate for their own children" (Children Now, 1996).

“A compelling body of evidence demonstrates that exposure to televised violence contributes to aggressive attitudes and behaviors, to desensitization to the victims of violence and fear among children” (Kunkel, 1/31/97). Perhaps one of the most watched genres of television seen by young children are cartoons. Some cartoons are in fact educational and non-stereotyping while others are not. In my opinion, the problem with the ratings in this area has to do with exposure to violence. I could not believe my eyes when I turned on the television early enough to catch the beginning of “X-Men” (a FOX show which many kids as well as college students watch) and found it rated Y-7 with the disclaimer superhero action drama. There is violence in the show from beginning to end. Other superhero shows like “Batman” and “Spiderman” (which are also on the FOX) have the same rating and disclaimer. I suppose the people who rated these shows felt that since they were not reality based then they would be taken with a grain of salt. Sure older viewers might, but many children have a difficult time figuring out the difference between fantasy and reality. These figures killing others and feeling no remorse are in fact real to some children. They then might go out and try some of these moves on others and not realize the consequences until someone really does get hurt. While this issue of violence may not effect all viewers, it will effect some. “...the pervasiveness of media violence is a serious public health and societal concern” (Kunkel, 1/31/97). Perhaps if there were descriptive ratings a parent would be better able to monitor the cartoons and shelter those who can not distinguish between real and not real; at least until they are ready to see the show.

“One quick flash of a tiny ratings icon doesn’t reflect how people actually watch television and the networks know it: Consider how networks regularly broadcast identification icons in the lower right-hand corner of the screen. Typically, these icons appear not only at the top of the show, but after every commercial break”(Biddle, 1/3/97). The idea of flashing the rating for a show in the upper left corner of the screen during the first fifteen seconds of all non-news, non-sports programs was a noble idea, but is not effective. Most people do not see the very beginning of shows, when credits are on and even if they do all one has to do is look down a minute and you have missed it. While the networks have complied with the voluntary rating system, they have not. The networks do realize that some parents will take the rating seriously and the audiences for some shows will decrease. No one can blame the producers for trying to find a way to keep as many viewers as possible. By flashing the ratings at a time when many are not tuned in and only

showing it for such a short period of time, they are keeping many viewers. Even television guides and preview channels have not, although this is changing, published the ratings. The only way someone is to know the rating is to see it at the beginning of the show. I have to commend Fox in their response to this issue. It seems as if about a week after the ratings began they did lengthen the time the ratings appear, yet this still has not solved the problem.

As far as the current ratings go, it seems as if they are being used very carefully by the networks. Some episodes of a PG drama will be rated PG-14, for a particular episode, but the networks are making sure that the series does in fact stay rated PG. The Rosie O'Donnell show which has been given the G rating has been celebrating their status by giving things away that begin with G and is constantly reminding the audience of its rating. I have yet to see a program labeled M, for mature adult audiences, which would cut down on the number of viewers. "Executives of NBC, ABC and FOX all said in interviews or through spokesman that their networks won't rate any of their series TV-M, mature audiences only..."(Biddle, 1/16/97). The only exception to this is "Schindler's List" which will be shown on Sunday, February 23 on NBC. In my opinion, this is probably one of the only programs that I might recommend to an older teenager. What the networks have done is made some of the ratings seem more desirable by placing a stigma on the M rating. As I heard said one day, the M has become the "Scarlet Letter" of the rating system.

Educating the parents who are the real users of this new system is imperative. The current system has not done this effectively. Parents need to be provided as much information as possible in a clear and concise format. Unless you happened to catch an article about the ratings in the paper, it was very difficult to find out what they were and what they actually mean. "How the rating system is explained to parents is critical. The industry should invest in an expansive public education campaign and should monitor parents' use of the system" (Children Now, 1996). It was reported in the same article as was just cited that the Entertainment Software Rating Board which has done a fairly successful job in rating and informing parents about computer and video games did so by using posters, interviews, brochures, parent groups, 800 numbers and a Web site. While this may seem like an enormous amount of work, it is an investment and well worth the effort. If the rating system is adopted than it will be used for many years to come. If the public is

informed now, then there will only need to be reeducation, but the major work will already be done.

As can be seen through the comments made, while the idea of the ratings system is an excellent way to help the children and parents, there are some improvements to be made to help it be more successful. As many studies and surveys show, a better way to categorize ratings is content-based instead of age-based. Giving parents the choice to decide for themselves what is appropriate for their own child according not only to the child's chronological age, but developmental age as well as parenting style. A board of parents, teacher and television network representatives should be given an equal say as the producers in developing the proper ratings for particular shows. A world wide marketing plan for the new ratings should be developed, marketed and followed up upon in order to educate the public. Perhaps showing the ratings symbol as much or even simultaneously with the networks identification logo would help those of us who do not have a quick enough eye to see the rating at the beginning of the show. Once a standardized system has been formed, it should be adopted by the networks and cable stations alike and be published in the television guides and preview channels. It is "...universally recognized that television ratings will not in and of themselves solve the problem of the negative impact of television violence and sexual content on children"(Children Now, 1996). But, the ratings may help a significant amount. Parents are currently looking at the ratings as being helpful to them and will only be patient with trial systems for a short time before becoming fed up with the chaos. The children of today are ultimately counting on you, please do not let them down.

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IN THE MATTER OF: The new television ratings system
COMMENTS OF: Adam Lenter, A225 Latin Way, Tufts University, Medford, MA 02155

Federal Communications Commission
Office of Secretary

COMMENTS:

The new system for rating television shows has many serious flaws. As a result of the subjective, self-imposed rating system, parents have only a slight, if any, advantage over the past unrated television system in terms of keeping their kids free from viewing objectionable material. The result of this system may be that children will actually view more of the offensive material than before the system was introduced. Before discussing the problems with the television rating system that I have observed, I feel it is appropriate to argue that the entire premise of the current method for rating television programs violates the integrity of the proposal that created it.

The self-governing rating system presently in operation contradicts its own fundamental assumptions. The main assumption of the proponents of rating television programs is that in this country parents are simply unable to monitor their children's television viewing habits. For a variety of reasons, parents in the 1990's simply do not have enough time or energy to control the television content and messages that flow into their homes and bombard their children. Realizing their inevitable shortcoming, concerned parents sought the assistance of the two biggest players in the transmission of television messages: the networks that produce and broadcast the programs, and the government which supposedly regulates the airwaves. The system upon which broadcasters and the government temporarily agreed mandates that the producers of programming place an age-based rating on their shows. These ratings are displayed in the corner of the screen during the first minutes of the programs. In other words, in order to know whether a show has objectionable content, a parent must be present at the beginning of the show. And just like the pre-regulation days, the parents must remain present throughout the entire broadcast to make sure the children do not view the censored program. Nothing prevents children from changing the channel the instant their parents leave the room. Moreover, when parents are not present, children are probably more likely to watch the types of programs their parents would choose to censor.

"Research conducted by Joanne Cantor, a professor of communications at the University of