

Wisconsin at Madison, indicates that young children, boys in particular are more attracted to program listings that include age based "parental guidance" warnings than they are to the identical programs when they carry a descriptive label-- for example, 'contains violent content' (Kunkel, 1/31/97). Since under the new rating system parents must remain present while their children watch television, parents will gain far more valuable information from the content of the shows than from the ratings. In other words, regardless of the show's rating, parents will most likely make determinations regarding the appropriateness of a program based on what they see, not on the show's rating. Therefore, the television ratings provide parents with a vague idea of the level of objectionable material in a show. And they can use this estimate for little more than reference. The ratings completely neglect the foundation they were created for: that parents cannot constantly monitor their children's television viewing.

The second greatest flaw with the new television ratings is the self-regulation aspect. While it would not be fair to say that television producers and broadcasters lack regard for the needs of children, it is certainly true that they have several additional variables affecting their imposition of ratings on their programs. Of course the greatest factor besides the needs of children is the almighty advertising dollar. The bottom line in the television industry is just that- that it is an industry, and that those in the business are capitalists. In order to ensure the greatest possible profits, executives try to generate the largest possible audience. Therefore the rating of programs could only have a limiting effect on audience size. This places the networks in an obvious and complicated dilemma. Through its commitment to regulate itself, the television industry takes more into account than just children when making decisions via this subjective rating system. Producers of television programming most certainly have a more loyal commitment to the advertisers than they do to their audience. Therefore, producers are more likely to obey the advertiser asking to rate a program "TV-PG" rather than an advocacy group pleading for a "TV-14" rating. Simply put, television producers do not have objective criteria to govern the rating of television shows, and therefore advertisers, with nothing to gain and everything to lose, have a major impact in the television rating process. Without any guidelines for applying ratings, the system is simply too

subjective, which is the next major argument against it.

Even though all of the players in the industry eventually agreed upon the categories for rating their television shows, no uniform system for categorizing shows was specifically discussed. Instead of explicitly stating what type of objectionable material (e.g. sexual themes, adult language, etc.) is contained in the programs, the rating categories inform the viewers as to what age group of children the producers believe can appropriately view the programs. The obvious flaw with an age based system is that it does not allow parents to make judgements based on their individual children. A parent who objects to violent scenes, but does not mind allowing his/her child from hearing profane language cannot obtain the specific information to determine the appropriateness of a show. The age at which different children should be able to view different types of mature content is based on culture, religion, familial beliefs, and the individual experience of the children. Only parents could possibly make these determinations for their children. Not only does this age based method prevent parents from making informed decisions, it also protects the producers of television shows. With a system based on content, producers would need to divulge information about the content of their programs. Misinformation could be easily disproved, and broadcasters could be punished for wrongdoings. However, nobody could dispute a subjective statement such as that a program may be unsuitable for children under 14 years of age. Producers can almost always justify their choices for particular ratings. Therefore, broadcasters completely lack any accountability in rating their programs under the present system.

Do these theoretical arguments against the new system for television ratings hold true for the way it has been practiced thus far? While the ratings are still young, the criticism has been widespread. Very few shows have yet to be given a "TV-M" rating, meaning that the content is for mature audiences only. The rating system was prompted by network shows with objectionable content, such as "Married With Children," "Homicide," and "Melrose Place." But thus far, these shows have not been given the "TV-M" rating. The argument made by executives is that the content of network television is extremely clean when compared to that of the cable networks. Warren Littlefield, NBC's President of Entertainment says, "Look, I think 'The Larry Sanders

Show' is a brilliant show, but every other line has the f-word. I think that's what cable does. That's not what we [in network television] do" (Littlefield in Biddle, p.N6). Contrary to the wishes of parents, Littlefield on behalf of the television industry maintains that because network television's content is less explicit than cable's it does not deserve a "TV-M" distinction. Therefore, one of the rating classifications has essentially been eliminated. Therefore, network executives have managed to avoid having to place the mature content label on their shows that parents would want to prevent their children from viewing.

Ever since the inception of the television ratings on January 1, I have been informally studying the ratings given to programs. One of my first observations is that NBC has given its Thursday night "Must See" line-up a "TV-PG" rating. One Thursday night, while the "TV-PG" rating graced the screen to begin an episode of "Friends," a couple was passionately kissing. Later that night, an episode of "Seinfeld," opened with Kramer lying in bed with a woman with whom he had just had sexual intercourse, and the two were discussing aspects of their lovemaking. Besides the questionableness of these actions in family shows, they occurred while the rating was still on the screen. This illustrated to me that if the ratings were designed to warn parents of forthcoming offensive material, then they inherently fail to stop children from viewing objectionable material at the beginning of the program.

On one episode of another popular family show on NBC, the "TV-PG" rated "Mad About You," the lead characters explicitly talked about the penis that Paul Buckman viewed on an ultrasound of his expected child. When his brother asked if it was big, he replied, "It was huge. Must be a Buckman." Later in the show, the doctor stated that it wasn't a penis, to which Paul replied, "I saw it the other day, and he was happy to see somebody." The word "penis" was stated at least 20 times throughout this episode. While many, if not most parents would not mind their children hearing these jokes, there certainly are parents who would be upset. NBC and the show's producers decided to rate the show "TV-PG," not anything higher. However, I believe that many parents would find such explicit humor unsuitable for children under 14 years of age, warranting this show a "TV-14" rating. This case, I believe, represents the rule, not the exception. In most

shows, the content is probably deemed unsuitable in many households and perfectly appropriate in others. This clearly illustrates the down side to television ratings. The appropriate ages that the producers guess in making their ratings probably will not be consistent with all families' policies. And without a more descriptive system, parents cannot rely on the ratings alone. The ratings are therefore just a loosely followed guideline. With an objective content based system, parents would have a much better sense with what they were going to view. Under the present system, parents could easily fail to censor from their children material that they deem inappropriate. In these instances, the rating is completely ineffective.

In determining a fair rating system, the television industry has chosen one in which broadcasters have little accountability and parents do not receive pertinent information. The ratings become little more than a symbolic commitment to the well-being of children. Rectifying this situation would be too easy. The industry simply needs to change to a more objective content-based rating system.

SUBMITTED BY:

A handwritten signature in black ink, appearing to read "Adam Lenter". The signature is fluid and cursive, with a long horizontal stroke at the end.

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CS 97-55

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APR 22 1997

Federal Communications Commission
Office of Secretary

In The Matter Of: The new television ratings system

Comments Of: Tiffany Ward
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Comments:

Within the last month I have noticed the new ratings system. At the beginning of most network television shows viewers have been able to catch TV ratings. The television ratings TV Y, TV Y7, TV G, TV PG, TV 14, and TV M flash very quickly at the beginning of most shows if you miss the credits then you miss the rating. For concerned parents this brief flash is not nearly enough. The concerned parent also has had a hard time deciphering what these ratings mean. Much like the movie ratings the TV ratings are based on age not content, which is not always helpful to a parent who wants to filter out particular TV messages. Who decides what is appropriate for a child of a certain age group? Because the television industry has been allowed to regulate itself we can not be sure that the ages given to the ratings are appropriate to developmental ratings. I think that the television ratings system needs to be totally revamped, the parents as well as specialist in child development need to be involved in the new system. The television industry can not regulate itself not because they do not have good intentions but because they are protecting their best interest and that is to have successful profitable programming. They would not create a system that could potentially damage their profits.

While watching TV this month my friends and I have barely noticed the ratings system unlike the television network logo which is on the screen for the duration of the show, the rating is on television for all of 15 seconds at the very beginning of the show. If a parent were to leave the room for any reason then they would miss the rating. What if a child were to start watching television in the middle of a show, the parent could not use the ratings system to determine content. Not that the ratings system gives you any information about content.

The content of these shows is not at all evaluated by the ratings system which makes the system useless. If the ratings system does not tell you what the show contains what does it tell you. It seems to me that parental discretion advisories at the beginning of television shows offer more useful information. For parents particularly interested in filtering out violent programs the ratings system offers little information.

But most frustrating for parents I think is getting information that tells them what the ratings mean. The news coverage of the television ratings system has been the only way the general public has been informed of the ratings and their meanings and how the ages were chosen.

The age grading seems to be arbitrary, the parent nor the rest of the general public knows if these are based on any real information about a child or a teenagers ability to decipher particular kinds of information. Because these age grading seems arbitrary so do there application. For instance TV 14 ratings are given to most Soap Operas and Talk shows as well as sitcoms like "Seinfeld" and some TV dramas like "New York Under Cover" these shows have little in common with one another. In shows like "New York Under Cover" violence is a norm but for shows like "Seinfeld" is not known for any particular violence or profane language. There is not an industry standard for the kinds of shows that deserve a particular rating.

In talking to a friend she said that she is surprised that night time Soap Operas like "Melrose Place" don't have TV M ratings she said that growing up in her house she and her sister were not allowed to watch Soap Operas because of the sexual content. The television industry has placed more of a value judgment on television shows rather than a content rating. By marking a Soap Opera TV 14 the network is saying that it is OK for your 14 year old to watch this. Instead the network needs to come up with a system that gives some information about the content and lets the parents make the value judgment as to what is and is not appropriate for their children.

I think that the most important thing in revamping the new television ratings is regulation. The television ratings system should not be voluntary all TV networks should use some system of rating television shows. This television ratings system should be regulated by a committee of people which includes parents, developmentalist, television executives as well as FCC officials. Leaving the television executives to their own devices is too risky and is proving to be ineffective.

First this committee must start by evaluating what they want their ratings system to say about the programming and then this committee should move on to determine an industry standard as to what kinds of shows deserve what type of rating. If at least these two steps are taken by a multi faceted committee I think everyone would be satisfied with the results of the new TV ratings system.

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February 18, 1997

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Federal Communications Commission
Office of General Counsel

IN THE MATTER OF: The New Television Ratings System

COMMENTS OF: Dana Werner
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COMMENTS: In my opinion, the recent *implementation* of the new system for rating television programming is definitely a step in the right direction, but the system itself is greatly flawed. I believe that we need a system in place that identifies each program's amount of violence, sexual content and offensive language; this information cannot be expressed solely by age-based rankings that offer a limited explanation of the criteria used to designate them. As the mother of a seven-year-old, I don't want the networks telling me what is appropriate for my daughter according to their perception of her as an impersonal member of an age group. I want the networks to openly declare what their programs contain, so that I can then form my own decisions utilizing my own values, parental judgment and personal knowledge of my child's level of maturity. In order for the television ratings system to work for parents and educators, as I believe it was intended, information regarding content must be incorporated into the system and the criteria used to formulate the ratings should be clearly defined.

One of the largest flaws of the current rating system can be found in the fact that the determination of rating placement lies solely in the hands of the program producers. There seems to be no set of determining factors that distinguish a program's place in the system. Without having to meet any basic criteria, why should the ratings be taken

seriously? Presumably, advertisers shun spots that correspond with shows holding stronger ratings in fear of consumer controversy. With the ratings left entirely up to the industry's discretion, it's probable that more focus is being put on advertisers' desires than on the needs of viewers.

This phenomenon is evident in the rampant PG ratings distributed during prime time, when "family viewing" is expected—the largest advertising audience. Unfortunately, finding a "family" show on one of the big networks between 7PM and 9PM is difficult considering that the majority of programs are angled toward the wage-earning consumers in the household. Thus, we are left with an array of news, tabloid television, adult comedies and soap opera/dramas with the occasional G-rated "Family Matters"-type program ("Family Matters" is aired on ABC Fridays at 8PM). It would seem that the producers don't want to lose advertisers or incense parents by running M-rated or too many TV14-rated shows during the "family viewing" time, so they apply a PG rating to almost everything that falls into that particular time slot — despite content. Look at Aaron Spelling's racy evening soap "Melrose Place" which airs on Fox Monday evenings at 8PM with a rating that fluctuates between PG and PG14, while a similar Aaron Spelling daytime soap opera, "Sunset Beach" which airs on NBC weekdays at 11am receives an unchanging rating (thus far) of TV14. It would be interesting to see the average rating "Sunset Beach" might receive if it were aired during prime time when advertising is more expensive.

To further demonstrate the watered-down nature of the PG rating, contrast the PG-rated episode of the family comedy "Everybody Loves Raymond" aired on CBS Friday, February 7th at 8:30 PM showing a brief comedic kissing scene in a parked car, to

the also PG-rated Monday, February 10th episode of “Melrose Place” which featured a fist fight, adulterous act, and numerous displays of physical passion.

It’s obvious that the parental guidance rating (PG) doesn’t give the parents enough information to decide whether a particular show is appropriate for their child. The ratings don’t reveal whether the show will contain profanity, nudity, violence or all three. If a parent doesn’t approve of a show like “Melrose Place” after watching the PG-rated episode mentioned above, it isn’t safe to apply that same prudence to other PG-rated programs because the rating isn’t content specific. So, how does the ratings system help us as parents to control what our children are exposed to on television? It doesn’t--at least not in its current configuration.

On this issue, David Kunkel, an associate professor of communication at the University of California at Santa Barbara wrote recently in the Chronicle of Higher Education: “The age-based system hides the descriptive information from the public ‘filtering’ it with the television industry’s judgment of what content is suitable for all children within a given age range...No one universal standard is appropriate for all children of the same age” (Kunkel, 1/31/97). In the same article, Kunkel also pointed out that a recent study conducted by the National Parent Teacher Association found 80 percent of parents favoring a rating system based on content description rather than age-appropriateness.

In a fair correlation Children Now, a national children’s advocacy group, suggested the need for similarity between the Food and Drug Administration label on food products and the ratings on television programming. They stated that an FDA label “tells us the amount of various ingredients in that item – how much sugar, how many calories,

how much fat and salt and vitamins. Consumers can then make their own choices about whether that product is appropriate for them. The TV rating system could work that same way” (Children Now, 1996). Parents need to receive adequate information about programming content to make informed decisions about family viewing, the same way they decide to make a nutritious meal.

If the networks labeled their programming according to levels of sex, violence, and profanity in an easy to decipher rating system, parents would be able to determine for themselves if a show was appropriate for their children. For example, levels of violence could be rated from 1-5 with a show depicting a small shoving match receiving a V-1 and a program containing a murder scene receiving a V-5. This system could also apply to sex and profanity on the same plane. Likewise, a show that is rated V-5 would contain similar acts and amounts of violence as any other show rated V-5, unlike the present PG rating which cannot be generally applied.

In addition, the ratings should be easily accessible -- plainly displayed during the beginning credits of a show and in any other information previewing or listing the show’s time (whether on television or in print media such as the TV Guide). Right now the rating only runs for a matter of seconds during the prelude to the show’s opening credits and the ratings also do not appear regularly in all published TV listings.

Now, I don’t claim that the content-based technique suggested above is a perfect solution, but I feel that it is more in line with the needs of American families than the current age-based rating system. We need to develop ratings in such a way that they provide enough accurate information regarding content to allow parents and educators to form their own opinions concerning the appropriateness of certain programming. The

widely perceived idea behind the implementation of a rating system was to help parents control the amount of television industry influence that their children were receiving. Ironically, the current ratings system does nothing more than bring television producers' values and opinions further into our living rooms. Not only do they continue to negatively impact our children through the production of televised violence, sex etc., it would seem that their ungrounded dictation of the ratings is undermining our own parental judgment.

It is my hope that you will seriously consider my comments and opinions regarding this topic. I firmly believe that viewers have a right to the knowledge of what a program contains before exposing themselves and/or their children to it. The only fair rating system is a system based on *content*.

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A handwritten signature in black ink, appearing to read "Dana Werner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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CS 97-55

IN THE MATTER OF: The new television Ratings System

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APR 22 1997

COMMENTS OF: Angela Karogiannis

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Student at Tufts University

Federal Communications Commission
Office of Secretary

COMMENTS:

As a regular television viewer myself in the midst of the new rating system currently being implemented on network television, I would like to express some of my concerns and suggestions about this television rating system that will affect viewers of all ages across the United States. While there are many critical issues that need to be assessed in making this system work for everyone, there are four key issues, in my opinion, that need careful consideration in order for the system to be effective and successful. The first issue to be considered is making the ratings themselves more informative. Then, the duration of the ratings during a program and along with that the consistency of the rating of a particular show is another concern. Moreover, the networks need to look at the possibility of rating all programs aired, not just ones they feel necessary to rate. Finally, the ultimate decision maker in this process should be the parents who will be assessing what their children can and cannot watch. In the remainder of this commentary, I will explain these issues in further detail.

I believe that the Federal Communications Commission has taken a step in the right direction in trying to aid parents in the difficult process of choosing programming for their

children to watch. However, the ratings do not provide parents with enough information regarding the content of a television program. Is the program rated TV-14 because of violence, sex or adult language? Each parent needs to make the decision according to the content being shown and not what age the network deems appropriate. Furthermore, children mature at different ages, and making a general category for all seven year old children for example is not applicable when one child at seven may not be ready for the material presented in that program rated TV-Y7. They need to come up with a code that indicates to parents what their children will be watching. Also as was noted in a recent article, "...boys in particular are more attracted to program listings that include age based "parental guidance" warnings than they are to the identical when they carry a descriptive label- for example "contains violent content" (Kunkel, 1/31/97 no page). This just further supports the point that descriptive codes will be much more effective for both parents and children than age based codes alone.

Beyond the content of the ratings is the issue of the length of time the rating icon is shown on the screen. Even judging from my own viewing habits, I rarely catch the first fifteen seconds of a program in order to see the rating of the given show. Often times people are searching the channels to find what they want to watch, and by keeping the rating icon on for the credits of the show will inform viewers of their choice without having to run to catch a show at exactly 8:00 p.m.. Furthermore, the ratings should come on during commercials of

the program to be aired in a day or two. According to a recent article, "neither ABC nor NBC bothered to broadcast rating icons during promotional commercials for their shows which might have proved useful" (Biddle, 1/3/97, p.D7). Parents need to know ahead of time what will be shown at a certain time their children will be watching television in order to make an intelligent and informed decision about the type of TV viewing allowed in their home. If the purpose of the ratings is to allow parents to decipher which programs to allow their children to watch, then they should have enough time to make that decision. Only showing them once is not enough.

A third issue that needs to be considered is the consistency of the rating of a particular show. When watching for example, Beverly Hills 90210, I noticed that one week it was rated TV-PG and the next week it was rated TV-14 (Fox network, 1/29/97-2/5/97). Granted, each episode deals with different issues and not all issues deal with adult topics. However, the whole genre of the show is for a more mature audience than thirteen year old children. Parents may see a program rated appropriate for their children's ages and decide not to block it and the next week find out it is rated differently. How can parents decide? The ratings are there to make it easier for parents and all viewers to distinguish the types of programs they want coming into their home. Therefore, it is just as necessary to provide a rating system that is consistent throughout a show's duration on the network.

Another issue that the FCC must look at is what shows are

actually being rated. Violence, sex and adult content have been isolated to programs that a large portion of adults watch anyway. There is a whole part of television programming targeted mainly at children, namely cartoons. While most cartons do not contain material inappropriate for young children, there are some cartoons that are filled with violent scenes. Young children are very much influenced by what their favorite cartoon characters do and say. Peggy Charin from Action for Children's TV argued that "to help kids think it's funny to hurt someone is the worst message of all" (Children Now, children@dnai.com, 1996). If their programming is supposed to send them a message about how to behave, then we should not be sending them a message that violence is acceptable behavior. It is not only cartoons either, but also some news broadcasts. Even though they are documenting real-life events, some are too traumatic for all viewers. Reality is not always a pleasant scene and "realistic portrays of violence pose a greater danger than fantasy violence" (Children Now, children@dnai.com, 1996). Therefore, while some parents want their children to be exposed to life today, some may want to shield them for a bit longer. Again, the point is to give the parent or adult in charge the opportunity to choose.

In my final comment about rating the new rating system, the FCC needs to re-evaluate the responsibility of who should have the final word on how programs are to be rated. The rating system's goal should be to work for the good of the population as a whole and not the television industry. By leaving the final decision to the networks, the power is put in the hands of the

business and not in the hands of the viewers who are the ones most affected by the new ratings. The ratings are to act in the best interest of the most vulnerable viewers, who are the children. The parents or guardians need to be given the necessary tools and information to monitor what their children. The networks are going to base their rating in a way that will not hurt the popularity of a program. If a TV-14 rating will decrease the viewing audience, then the network will want to rate it lower so as to keep the ratings high. While I do not blame FOX or NBC for wanting to control the ratings, the ultimate decision has to be made by a higher authority if not the parents themselves.

The ideas and concerns presented above require thought and re-evaluation on the part of the FCC and the networks themselves. I definitely support those who made the effort possible and acknowledged the need for parents to be informed about what is being presented to their children in the media. I have made some recommendations throughout the commentary as to some of the necessary changes in order for the ratings to be effective. Based on my own observations and experience with the system, it is critical that at least the ratings be aired for longer periods of time and more frequently. The viewers need to become familiar with the ratings and need to learn to use them to their advantage.

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CS 97-55

IN THE MATTER OF: The new television ratings system

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COMMENTS:

The new ratings system is clearly better than no ratings at all. It has the potential to be a very useful tool to parents and others supervising what children watch on television. However, there are many problems with the system: the difficulty in determining what a show is rated because of the limited disclosure of the ratings; the fluctuation of shows' ratings between "appropriate" and "inappropriate" in sequential time slots; and the complex nature of the ratings scale itself. These problems are forcing parents and educators to work unreasonably hard to use the ratings.

In general, television shows seem to be assigned the appropriate ratings, yet it is often difficult to determine what a given show is rated. The thirty seconds or less that the rating appears of the top left portion of the screen is simply not long enough. It is very likely that a child would begin watching a show from the middle, or channel surf from one program to another. Starting a show even a minute late would mean missing its rating. While the networks may feel that the ratings icons are a distraction from its programming, the ratings become useless when one doesn't know what they are. In contrast, networks regularly broadcast identification icons in the bottom right hand corner of the screen--sometimes for a show's entirety and other times after each commercial break (Biddle, 1/3/97). Likewise, the ratings should be displayed throughout the show's entirety, or at least after each commercial break.

Because the ratings icons are only shown at the very beginning of each show, they cause something I call the "tease effect." An adult or child has no way of determining the rating of a given show without watching its beginning. The first thirty seconds of a show may seem very interesting to a child, but he or she would be forced to turn off the show if its rating deems the show inappropriate. Therefore, children are teased by inappropriate shows. On a similar note, the first thirty seconds of a program may have violence, sex, or adult language. A child may be exposed to this content while innocently determining the rating of a show.

Thus, ratings must be disclosed in advance. Parents should have the right to know what a given show is rated at any time. *TV Guide* attempts to provide a listing of the ratings, but it is incomplete. There are many shows which do not have ratings listed from time slot to time slot on a given channel. For example, on WPRI of Providence, RI, a CBS affiliate, for Saturday, February 15, 1997, *TV Guide* listed a rating for *New Captain Planet* at 7:00 a.m. and *The Mask* at 8:00 a.m., but not for *Nick News* aired in between them at 7:30 a.m. (*TV Guide*, 2/15/97).

In addition, previews for upcoming shows in the form of commercials, do not state what the episode will be rated when it airs. Thus, children are uncertain whether the show is appropriate for them until it actually airs. This subjects children to a greater "tease effect," should the show be intended for an older audience. It would be better if the child knew immediately from the preview that the show was not an appropriate one. Networks should be required to announce an episode's rating during every preview for that episode, similar to the previews for Hollywood movies.

Another problem with the new ratings system is the oscillation between the TV-Y and TV-Y7 ratings from time slot to time slot on a given television station. Imagine a six year-old child sitting in front of the television watching the show *Feed Your Mind!* on Saturday morning at 7:05 a.m. The child notices that the episode is rated TV-Y, so he or she continues to watch. At 7:35, *New Captain Planet* comes on. It is rated TV-Y7, so the child must leave the room. The same child checks back at 8:05 to find that the *Flinstones* is on and has a TV-Y rating, so the child once again resumes watching television. This fluctuation between "appropriate" and "inappropriate" programming is a common occurrence, yet is unfair to children who are only a year or two below the age cut-off. This particular programming scenario happened on Saturday, February 15, 1997 on TBS.

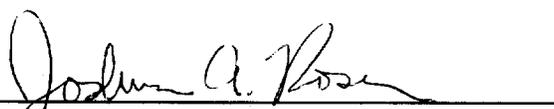
The above situation with the six year-old child assumes that a parent is checking the ratings at the start of each half-hour show, or the less likely situation that the child is enforcing the rating for him/herself. For many families, neither scenario may be the case. Therefore, a given rating should be required to span multiple sequential time slots. More importantly, these time slots should be predetermined and consistent. Both parents and children would know which times guarantee appropriate television programs. It then becomes less important to pay attention to the top left corner of the screen than it does to the time of day. *When* children are watching the TV can be more easily supervised than *what* they are watching.

To the average television viewer, and more importantly to parents, the new rating system can seem confusing. People are very familiar with the movie rating

system in which there are G, PG, PG-13, and R ratings. Therefore, it is easy to understand what TV-G and TV-PG, and TV-14 mean for television ratings. However, the role of TV-Y and TV-Y7 in the television ratings scheme is less clear. Although TV-Y and TV-Y7 are intended to label shows which are specifically designed for children, the distinction between TV-G and TV-PG has not been made clear to the large viewing population. Children's cartoons, for example, are mostly rated TV-Y or TV-Y7. Giving these cartoons a TV-G rating instead would be more clear to the general population. In truth, a cartoon rated TV-Y is suited for a general audience, for it is appropriate for all ages.

It is very difficult to find an explanation for the ratings anywhere. To find a description of the ratings, I consulted an article which appeared in the *Chronicle of Higher Education* on January 31, 1997. It is only in similar newspaper and magazine articles that the ratings are defined. The majority of these articles were published in January 1997, the month that the ratings were introduced. Parents, or any other television viewer, are unlikely to travel to a library and search for such articles. Of course, if the ratings were more uniform to that of movies, there would be less need for explanation. But, because the new television ratings are different from the movies, especially TV-Y and TV-Y7, networks should be required to explain what the ratings mean regularly. Without such explanation, the ratings become meaningless.

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IN THE MATTER OF: The new television ratings system

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Federal Communications Commission
Office of Secretary

COMMENTS:

I am a college student currently enrolled in a child development course who's main focus is to take a look at children and the media's effects on them. Many interesting issues have been raised in the class thus far, one of them being the new television ratings system which the FCC has recently developed. The idea of a rating system is a huge step ahead for improving the way in which parents and other care-givers can monitor what children can and cannot watch on television. I also, however, see some important ways that this system can be improved to more and better serve the needs of its users.

As it stands, the ratings are based on the age groups that certain programs are appropriate for, including TVY, TVY7, TVG, TVPG, TVPG, and TVM. I see a need for a system that is, rather, based on the content of the shows, and what it is about the show that makes it inappropriate for certain audiences. Parents feel differently about various types of content, some think that their young child can handle some adult language but would be up all night having nightmares if they were to watch a scary show late at night. This is a pertinent issue as studies have shown that children are watching the television at all times of the day, not only when cartoons and other shows that are supposedly geared towards children air. One such study done by Larry McGill shows that almost the same number of children watch television on Saturday mornings as they do during the week at prime time, 10.5 million and 10.1 million, respectively (McGill, 2/93, 98). Another area where I see a need for improvement is in the consistency of the ratings for programs that appear either weekly or nightly. Parents should be able to turn on a program on any given episode and know whether it is something that they feel is suitable for their child. One last suggestion that I would like to bring to attention deals with the way that parents

are notified of the ratings. A small icon that appears in the upper left-hand corner of a television screen for about ten seconds is hardly sufficient. All of these issues, which I will discuss in more detail below, are ones that I feel are crucial to the success of this endeavor to improve the way our nation's children watch television.

There are a number of different reasons that a particular program may be considered inappropriate for young children. "Melrose Place", a Fox program, sometimes contains adult language as well as sex which leads it to get a rating of TV14. On the other hand, a show called "Animal Attacks III", which aired on Monday, February 17 at nine o'clock, directly after "Melrose Place", got a rating of TVPG as a result of some violent content. Having watched some of both of these programs, I found the latter of the two to be the one that I would not want my child watching, even though it got rated as being more suitable for younger children. Many parents would agree that they believe that their children will be more sensitive and effected by violence on television rather than some adult language. I would rather my child see two people kissing on television during a show that I can explain is make-believe, than let them see a real home video of a lion attacking a man.

Parents should be equipped with all the important information that they need to know about a particular program so that they can decide what is appropriate for their child to watch. Not all ten year olds are the same.

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 a show's content may find it inappropriate for their child (Children Now, 1996, 3)

Each television network has the power to have its producers rate its own program, and most parents would agree that these people may not be the best ones to judge, as they are out for their own purposes. Networks want as many people as possible to watch their station, so they will do all that they can to make their programs appealing to the largest

possible audience. This may mean that they will try to be as vague as possible when they rate shows. Parents deserve more information than they are now given. Two studies conducted that concern this issue concluded that 79-80 percent of the parents interviewed preferred content rather than age-based ratings (Kunkel, 1/31/97, 2)

When ratings are being decided, they should be kept consistent for certain recurring programs. As is, there are certain shows that get different ratings from one episode to the next. This may be as a result of certain issues that come up in a particular episode, but if a parent sees the show once, with a mild rating, they may let their child watch it, not knowing that the next time it comes on, the subject matter may be too mature for their child. Viewers should know what type of program they are watching, whether or not it may be a tame issue, people need to know that a program, in general, deals with mature issues.

Consistency is again an important issue when the television ratings are compared to the movie ratings. Someone who has not read up on the ratings, or is just not aware of their existence may see a show that is rated TVG, or TVPG and assume the same that they would for a film that carries these same ratings. Access Hollywood, which airs at 10:30 on Saturday nights, is given a TVG rating. This show is about all the scandals and smut that goes on in the world of the stars, and I hardly believe that if this were to be a feature length film about who is having affairs with who and who is suing who for sexual harassment, that it would get a rating lower than PG-13. Film and television ratings should also be differentiated because oftentimes, a parent will tell a child that they are not allowed to see movies with certain ratings, which leads a child to want to do all that they can to see those movies. Dale Kunkel discusses research done by professor Joanne Cantor who explains her "forbidden fruit" effect.

Young children, boys in particular, are more attracted to program listings that include age-based "parental guidance" warnings than they are to the identical programs when they carry a descriptive label-for example. "contains violent content" (Kunkel, 1/31/97, 1)

Regardless of what a program is about, whether a child would normally be interested in it or not, the ratings may actually entice children into watching programs that they would not really enjoy, and that may be inappropriate for them.

The last issue that I would like to discuss is that of the presentation of the ratings. When I set out to research this issue, I spoke to a number of fellow students to see what they thought of the new rating system. Most of the people did not even know that a television rating system even existed, and the few who did had no idea what the different symbols meant. Outside of the readings that I have received as a result of being enrolled in a course about media effects on children, the only place I have seen any information explaining the system where people might see it is in an issue of "TV Guide". The quarter of a page dedicated to the new rating system appears on page 58 of the issue I picked up (the week of February 15-21), gave less than one line of explanation for each rating. TVPG described that, "some material may be unsuitable for younger children." What does that mean? What constitutes a younger child, and what makes a program unsuitable for that child?

On the actual television screen, the rating appears in a transparent box on the upper left-hand corner of the screen for about 15 seconds at the start of the show. There is a good chance that many viewers will miss this altogether. "Most viewers are, more or less, channel surfers who don't exactly obsess over the opening credits. One quick flash of a tiny ratings icon doesn't reflect how people actually watch television" (Biddle, 1/3/97, D1). Sometimes a parent may be sitting with their child while they watch television, but they may not be paying particular attention to the screen. They may be watching their child, or working on something else, and would have no audible warning that a show has come on that they would not want their child watching. By the time they look up, the icon will probably be gone. A solution to this issue may be as simple as having a voice over at the start of a show that tells viewers why the show may not be appropriate for all audiences, or that the show is appropriate for all audiences. After