

programs. Again, the omission of commercials in the new ratings system probably stems from a fear of losing advertising revenue. Yet, the impact of commercials should not be overlooked. Unlike any network program, they are shown repeatedly in a given time frame, and are often imitated and memorized by avid TV viewers. Just as previews of G-rated movies are usually shown before Disney's animated films, commercials should be rated accordingly with the particular program being aired during that time. Put another way, exposing kids to advertisements for TV-14 programs during a TV-G or TV-PG shows is like tempting them with candy they are not supposed to have. A good commercial can make even the worst TV-movie look intriguing. Of course kids are going to want to watch.

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Federal Bureau of Investigation  
Department of Justice

IN THE MATTER OF: The New Television Ratings System

COMMENTS OF: Lea Schwartz

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COMMENTS: Although the television rating process is a positive development for the monitoring of children's viewing, it is far from flawless. The system is primarily useful for parents trying to find a method that would successfully aid them in censoring programs for their children's viewing. However, the rating symbols are a chore to detect, vague in description, and appear inconsistently. For this new system to prove effective, many changes have to be made to ensure that adults are aware of the content their child may be watching on the screen.

To recognize a small symbol on the far upper left corner of a huge television screen is not an easy task. After less than one minute, these images disappear and are not shown again for the entire one-half or full hour program. The majority of watchers do not regularly turn on the television set at the very beginning of the show. Usually this occurs when desiring to see a certain show, but these viewers are more likely to be aware of what the program contains. "Channel surfing" is becoming one of America's favorite pastimes, so viewers rarely see the start of any program. Occasionally, the ratings will appear even before the title of the specific program has appeared on the screen. Many programs, such as "Mad About You" on NBC, has a clip before the name is shown to the viewer. The symbols are shown during this twenty second clip and are not reiterated at the beginning of the actual program. While flipping through with their remotes, the viewers catch a glimpse of the title, signaling the start of the program, and choose to watch. They do not

see a rating of any sort and are unaware of the content until an unsuitable scene is portrayed. These clips are shown a couple minutes before the top of the hour or half-hour (such as 7:58 or 5:27). For those not familiar with the show, they begin watching at 8:00 after the clip with the rating is over.

In addition to their inconspicuous portrayal, the actual ratings are themselves unclear. The descriptions of each rating, TVY, TVY7, TVG, TVPG, TV14, and TVM, present the viewer with insubstantial information to determine what qualifies as appropriate for their child. For example, TVPG definition is "Program may contain limited sexual or violent material that may be unsuitable for younger children" (Kunkel, 1/31/97, N.P.). The clarification of "limited" and "younger" are lacking in explanation. An adult has no knowledge about the actual content that will be airing, and if a child around the age of thirteen is viewing, he or she may be allowed to watch. The next rating in line is TV14 so a thirteen year old can watch anything deemed TVPG, right? Next on the screen comes an overheard sex scene, such as a recent episode of NBC's "Friends", but the adult has already left the room thinking that the show is appropriate. (Biddle, N.D., p.N6). On an episode of FOX's "Party of Five" on February 12th, a nineteen year old child was not condemned for drinking excessively until his family thought that he was an alcoholic. This show was rated TVPG but no parent would want their preteenage child to think that underage drinking is accepted in any amount of consumption. There are no further details in the ratings to explain what kind of sexual or violent actions may appear. The word "younger" also has no meaning to the monitoring adult because the age the raters are discussing is never told. What one parent believes suitable may not coincide with the rating that was felt to be reasonable for the program's content. Even if these

symbols seem vague, they can be an advantage to those parents who are completely oblivious to any program's content. However, these descriptions are not easily accessible. They can be found in television guides but not every household looks at these publications closely enough or at all to get this information. Not enough parents are able to use these ratings to their fullest due to their confusing definitions and difficult finding places.

Reliability and consistency are important factors in determining how well a new system works in the world. The reliability was expressed to be questionable earlier, but even the consistency element does not appear without fault. Not all episodes of the same program are rated exactly the same. For instance, the most popular pre- and teenager shows are FOX's "Beverly Hills, 90210", "Melrose Place", and "Party of Five". One week each show will be rated TVPG and the TV14 the next. For a parent that is concerned about what their child views, this could cause complications. Not many adults sit down and watch these programs with their children. The first week they check the rating and it reads TVPG so the parents okay its viewing. When the child sits down the next week to watch the same shows it reads TV14 but the parent is unaware that the rating has been changed. It is appropriate for the rating to change according to each episode but this inconsistency occurs without the parents' awareness.

Producing a flawless system for rating programs seems nearly impossible, but there are simple steps that can help the ratings perform closer to parents' expectations. For instance, allowing the symbol to remain on the screen for the entire duration of the program would be a start. This way, the rating would be clear to the viewer at any point of the program. Only enlarging the symbol would cause problems in possibly blocking the show's action, so permanently placing the image on the screen could lead to more viewers

recognizing them. One solution to the clarity problem would be to change the actual symbols presented. Instead of having TVPG or TV14, the images should read N, L, and V (for nudity, language, and violence) with an age deemed reasonably appropriate for its particular episode's content immediately following, N15 or L13. Granted it is still each parents' responsibility to determine whether the rater's opinion of material suitable for a thirteen year old matches their own. The parent must also pay close attention each time their child is watching a program due to the inconsistent ratings of certain shows. If the ratings were permanently placed on the screen, all that would be needed would be a quick glance towards the beginning of the show to check if the material was appropriate. Parents should never feel completely off the hook when monitoring the child's viewing, no matter what further rating system is created.

Although this process is a great step in showing concern for what a child is watching on television, the development should not stop at this point. The present system is still far from flawless, and it is everyone's responsibility involved to continue to perfect what has already been created. What is produced from the original can do nothing but help aid what parents around the world have been trying to do for years- protect their children.

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Federal Communications Commission  
Washington, D.C.

IN THE MATTER OF: The new television ratings system

COMMENTS OF: Alexis Kremen  
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To whom this may concern,

I am writing in reference to the new television rating system that has just begun to take effect over the past several months. While I believe that this new system has brought about a new sense of awareness for television viewers across the country, improvements must be made in order to protect young viewers from inappropriate programming.

I am a student of Tufts University and am currently enrolled in a course concerning the effects of television and media on children. Until we discussed the issue of the new television rating system, I had know idea that it had even existed. I then began to make an effort to watch different types of programming to obtain more information concerning these new television ratings. I found that unless one is actually looking for the rating of a specific show, it can be very difficult to notice the small symbol located in the corner of the screen. If the purpose of this new rating system is to warn parents that certain shows may not be appropriate for their children, the ratings need to be aired on the entire screen before the actual program appears on the

television. By placing the rating on the entire screen, it will become a lot easier for parents and viewers to notice the rating of a specific show, and they can thereby make the decision on whether they will allow their children to continue watching.

Another problem concerning the new rating system is the duration that the ratings remain on the screen. If one is to turn on the television several minutes after a program has begun, it is very possible that the rating is no longer on the screen. It is therefore possible that parents and children may sit down and watch a program only to find out that the content is inappropriate for family viewing. In order to prevent this, it is necessary to have the rating aired several times throughout the program, not simply before the show begins. The Fox Network has already begun to air the ratings several times throughout television shows. Especially during after school hours, ratings are shown prior to the program, after commercial breaks and several random times throughout the duration of the program. However, on all other networks, I have only noticed ratings being shown on the screen before the television program begins. This inconsistency reveals yet another problem concerning the entire rating system in general.

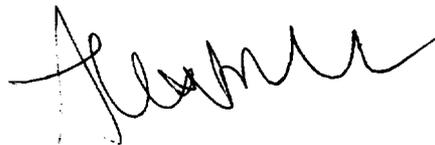
The new rating system seems to be inconsistent in two main areas. First, on the major networks, such as NBC, ABC, FOX, etc., not all of the programs are rated. For example, the FOX network on the weekdays holds a time block which they distinguish as FOX for kids. This time is set aside for children to watch from the time they get home from school until about five o'clock PM. All of the programs, including shows such as "The Power Rangers", have ratings aired throughout the programming.

However, the "Ricki Lake Talk Show" comes on at five o'clock and there is no rating for this program. To have a rating on a show like "The Power Ranger", a show aimed at children, and then not to have a rating on "The Ricki Lake Show" is ridiculous. The topics brought forward on this program deal with issues of drugs, sex and violence. Not only are the topics not appropriate for certain age groups but also the manner in which they are discussed is very inappropriate as well. The new rating system is also inconsistent because the amount of ratings that appear on each network varies tremendously. Some networks place ratings on more of their shows than others. I can honestly say that aside from programs on NBC and the FOX network, I have not seen a single rating. These inconsistencies need to be corrected in order to keep the rating system from disappearing off the television screens. All programs need to have some sort of content rating and each network needs to work on making this possible.

The ratings were developed to warn parents that certain programs might not be appropriate for some children. However, if parents are unable to understand the symbols involved in the rating system they will not be able to stop their children from watching shows that are in fact inappropriate. TV guide holds a key which distinguishes the symbols and signs and makes it easier for viewers to understand the rating. This is helpful, but only helpful to those that actually subscribe to TV guide. What about those that do not read this magazine? One afternoon as I was watching a program on the NBC network I noticed a commercial which gave viewers an 800 number if they wished a better understanding of the new ratings. This too is helpful, however this commercial aired in the mid-afternoon, a time when most parents are

away at the office. I have only seen this commercial once, and believe me, I watch a lot of television.

The new rating system has conjured up many different issues and emotions over the past several months. It is a new issue which has been under heavy debate and has received extreme criticism. For the most part, I believe that this new rating system is something that is necessary regarding the protection of our children with the help of the parents or guardians. The system has just begun to take effect, and therefore can not be expected to be perfect right away. However, vast improvements need to be made. In order for the system to do what it was created to do, the ratings need to be more consistent and viewers need to be informed of the nature and purpose of the rating system. Programs need to be rated on the basis of the content of that specific show, for the content of programming changes each time the show is aired. Once these changes are implemented, or rather, if these changes are implemented, parents and viewers will be able to use the new ratings as a way to filter the television that young children watch in a way in which they find beneficial for each individual. Please take my suggestions into account and realize that further improvements are necessary. Thank you for your time.



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Federal Communications Commission  
Office of Secretary

**IN THE MATTER OF:** The New Television Ratings System

**COMMENTS OF:** Carolyn Hyson, 208 Carpenter House  
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**COMMENTS:**

The new television ratings system is the subject of much debate throughout the American government as well as in the American family. The attempt to lessen parent's burden in regulating the television shows that their children watch is a step in the right direction. However, certain aspects of the system should be reconsidered. The physical nature of the rating system is difficult to interpret. The size of the icons and the length of their display are not appropriate for parental analysis. The structure of the ratings system is age-specific as opposed to content specific which also causes difficulty in consistently applying and analyzing the ratings. Finally, the networks rate their own shows which also undermines a universal system. These three areas create a system which is often confusing and difficult to interpret.

The size of the icons and the ambiguity of the actual ratings contribute to the general confusion surrounding the meaning of the ratings. The small icons remain on the screen for only a few seconds. The icons are usually shown before or during the opening credits, a time when many television viewers are channel surfing. As a result, viewers will frequently miss the ratings altogether. Many cable stations such as USA leave their station names in shadow form in the corner of the screen for the duration of a show. A small discrete icon, such as the USA symbol, that remained on the screen for the entire program would be a more effective way of reaching a broader viewing population.

TV guide now includes the ratings of certain shows in their catalogs in an attempt to compensate for the amount of television viewers that miss the icons. Parents are now able to seek out the ratings of specific shows. Another result of TV guides attempt to publicize the rating system

is that parents can determine if their child will be able to watch a certain show before it actually airs. However, not all ratings are indicated in TV guide and the television schedules listed in the newspapers do not contain ratings symbols. As a result, only a select group of viewers are able to determine show's ratings before they are aired. If parents are not able to preview the ratings of shows, they can not restrict their children's viewing before they begin to watch the show. Ratings should be indicated in TV guide as well as in newspaper schedules of the shows. Also, to reach more parents, the commercials for a show should indicate the rating of that show.

Even with these modifications, the ratings will only work for involved parents. Parents who are seldom around or who do not take an active role in their children's lives will not take an interest in helping them regulate their television exposure. These parents will not be watching television with their children and will not be determining whether or not a show is appropriate for their children to watch. The parents who will be interested and involved in watching television with their children are most likely parents who already regulate their children's television viewing. These involved parents may make use of the new system but the children who need the ratings system the most are those whose parents do not take regulation into their own hands. These children will not be helped by the system as it exists now. The benefits of the system will be minimal as those who will attempt to use it will already perform many of its duties. The system itself can not be modified for improvement in this respect. Parents must want to take an active role in their child's development and increase their own involvement in their children's lives.

Those parents who do attempt to use the ratings system are likely to be confused by the icons. The V-chip Television Rating System as it has been described for the public in many newspapers throughout the country consists of six basic ratings (Kunkel, 1/31/97). TV-Y and TV-Y7 refer to children's television programs. This ratings determine which children's shows are suitable for all children and which are suitable for only children over 7. These two ratings seem very

straightforward but the situation is confused when the TV-G rating is added. This rating states that a program is suitable for all audiences. Although the TV-G rating refers more to family shows than specifically children's shows, the difference between TV-G and TV-Y is difficult to determine. Many parents will not be able to distinguish between the two ratings. TV-PG, TV-14, and TV-M are very clear about what they are supposed to indicate about a television program.

The ambiguity surrounding TV-G and TV-Y sparks a debate about whether or not age-specific ratings are effective. A content specific rating system which would describe directly whether violence, sex or adult language was contained in the program would be more informative to parents. Each child is different and material will affect her in very different ways. The child of a military officer may be completely desensitized to violence. The same child may hysterically run around the house repeating adult language she has learned from TV. Another child may be fully conditioned as to what language is appropriate in public situations but will lay awake at night in fear because of violent programs. Parental regulation for these children is dependent on the parent's understanding of their child's specific needs. These parents need a system which will inform them of the specific content of a show. The age-specific ratings at the beginning of the show will not tell parents if there are violent sections to the program. It will be too late for the parent to terminate the show in the middle of a violent scene, they need to be informed of certain content ahead of time in order to protect their children.

Age-specific ratings protect the television industry. By avoiding content-specific information, the industry is protected. Ratings which label shows as violent or sexually explicit might be shunned by advertisers. The age-specific ratings are a way to prevent controversies over censorship. The rating system is a simple solution to a complex problem. Rather than attempting to improve children's programming and increase the amount of educational television, the ratings provide a type of Band-Aid solution. The ratings are used to imply that television programming is being improved

without really having to change anything. Programs can continue broadcasting as they have been only now they are required to include a rating in that broadcast. The United States needs a rating system which will clearly inform parents of the content of shows. A successful system, clearly describing the content of shows would work for everyone involved. If the system clearly indicated to parents the type of shows they would not want their children to be watching, the amount of people watching negative children's programming would decrease and advertisers would shift their support to more popular quality children's programming. As a result of this pressure from viewers and advertisers alike the amount of educational children's programming would increase and the cycle would continue.

If anything, television programming might be negatively affected by the type of system in place now. As Dale Kunkel mentioned in *The Chronicle of Higher Education*, the ratings could create a boomerang affect in which more children watch the shows that are marked with parental discretion advisories. Children desire the forbidden (Kunkle, 1/31/97). Shows designated as violent or sexually explicit will become tempting especially to older elementary and middle school students. These children will search out these shows expressly because they should not be watching them. If programs and advertisers notice this affect, they may increase the violent and sexual nature of their shows in order to receive a higher rating and attract more middle school children. One way to avoid this issue would be to create a positive rating system. Instead of indicating which shows require parental discretion, the system could emphasize quality educational programs.

As the system stands now, the networks are self-regulating. Each show determines its own rating. This type of system is highly inefficient. It is impossible to keep ratings constant. Similar shows covering equivalent topics may have different ratings. For example, CBS's "The Late Show with David Letterman" is rated TV-PG while NBC's "Tonight Show with Jay Leno" is rated TV-14 (Biddle, *The Boston Globe*). The lack of universality in the ratings provides many problems for

parents. They cannot determine a strict cut-off of what their children will be allowed to watch. It is not appropriate to say that children are only allowed to watch TV-PG shows because a certain PG show might be much more violent than another. As a result, the parents job of regulating is further complicated. The rating system must be universalized. A concrete set of standards should be used to determine which category a particular shows belongs in. A committee should be organized to set universal standards and make sure the networks are complying with these standards. Common rules for forming ratings for either a positive or negative based regulation system are fundamental if the system is to be applied world-wide.

One area in which the ratings system does account for differences in rating technique is in the fact that each episode is rated individually. One show can have a variety of ratings for a given episode. Although this variety may cause some confusion it is incredible important as individual episodes attack diverse issues. ER, a popular emergency room drama, has been rated both TV-PG and TV-14 depending on the sensitivity of the subject (ER, NBC). The uniqueness of each episode of a given TV show necessitates the ability to change ratings each week.

The television rating system is a long awaited step in providing quality programming for children. Television is a powerful media device which can be used to open up incredible worlds to children or to destroy their childhood illusions with worlds of pain, fear, and stereotypes. Regulation of television exposure is first the responsibility of the parents. However, when parents are not able to handle the situation alone, a system such as the rating system must be implemented to assist them. This program is an excellent beginning but changes in the physical display of the ratings and in the determination of the ratings themselves are needed to create a mutually beneficial system for parents and the television industry.

**Submitted by:**

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Federal Communications Commission  
Washington, D.C. 20541

**In the matter of:**

The new television ratings system

**Comments of:**

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**Comments:**

When commenting about the new ratings system, President Clinton said that “this is a huge step forward over what we have now, which is nothing” (Biddle, 12/30/96). Undoubtedly, anything is better than nothing. In that sense then, the new system is a step towards the right direction. Presently, however, the new ratings system does not provide parents with enough information to help them make intelligent decisions about what their children can and cannot watch. Viewers are not told why a program is given a certain rating or how much violence or sex a program contains. Additionally, the icons are only shown during the first fifteen seconds of the opening credits of a program. Thus, it is fair to say that the majority of people miss them, either because they do not watch the opening credits or because they get there a few seconds too late. Furthermore, the networks have not made enough efforts to let people know what the ratings mean. So, a person may see the ratings for every program he watches, but may not understand what any of them mean. Finally, there is much inconsistency in the ratings. Consequently, many parents may label the ratings as untrustworthy or may be dissuaded from taking them into account. Clearly, although the new ratings system is a step forward, as President Clinton claimed, that step is not large enough. Of course, things have to begin somewhere, but for the system to be useful and successful, many things have to be changed.

According to a report presented by Children Now, a national organization that seeks to “improve the lives of American children,” the goal of television ratings should

be to provide “parents with as much information about television content as possible, allowing the parents themselves to determine what is appropriate for their children” (“Making Television Ratings Work for Children and Families,” <http://www.childrennow.org>). In this manner, parents would be allowed to make their own decisions about what programs their children could watch, based on the details given by the ratings. As it is now, however, the system is trying to make things as easy as possible, but is not providing parents with enough information about the contents of TV programs. Age-based ratings do not give viewers information about the amount of violence, sex and obscene language that a program has. Instead, they provide parents with ratings that dictate what children of each age can watch, leaving each parent without the right to decide what content is acceptable for his own children.

At the same time, age-based ratings assume that all children of a certain age are capable of understanding the same contents and same amounts of violence and sexual encounters. In reality, however, there isn’t a standard to the kinds of content that children of a certain age can watch and understand. Two children may be of the same age but may have completely different upbringing. Thus, their levels of understanding will be entirely different and both may react differently to the same program. Similarly, a parent may allow his twelve-year-old child to watch a program that is rated TV-G, but may be completely opposed to his child watching sexual content. Thus, “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 show’s content may find it inappropriate for their own child” (“Making Television Ratings Work for Children and Families,” <http://www.childrennow.org>). Furthermore, what is acceptable for some parents may be unacceptable for other parents. With the age-based ratings, all parents have to assume and trust that the content their children will be presented will be suitable for their age and degree of maturity. However, they will never know for sure whether the content of a certain program goes along with their own values.

For the television ratings to work, they have to provide information about why a particular show has been given a certain rating. Thus, the ratings system should also include ratings for certain categories of content such as the amounts of violence, sexual situations and profane language that a program contains. This way, ratings would be more useful in helping parents decide what is appropriate for their own children. Some people argue that this would make the icons too complicated for most parents to understand. However, in a press conference, Rep. Ed Markey, a Democrat of Massachusetts, made a very strong point. He “held up two sheets of paper, one with the official TV-PG rating and the other with a V-PG, in which the V would stand for violence. The TV industry’s system, he argued, is at least one letter more complex than theirs” (Biddle, 12/30/96). Furthermore, surveys have shown that, in general, parents prefer a system that is content-based over one that is age-based. One study by the National Parent Teacher Association, for instance, “found that 80 per cent of parents preferred the content-based, descriptive system to age-based categories. [Similarly,] a replication study conducted several weeks later for the Media Studies Center produced an almost identical figure: 79 per cent of parents favored content information over age-based categories” (Kunkel, 1/31/97).

Another problem with age-based ratings goes along with the argument that using age labels may actually increase the number of children who watch programs that are inappropriate for their age, rather than decreasing it. According to some research conducted by Joanne Cantor, a professor of communications at the University of Wisconsin, “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). Cantor further suggests that children are usually more attracted to things that are forbidden to them or that are intended for older audiences (Kunkel, 1/31/97).

Also a problem with the present ratings system is the fact that the labels flash by

too quickly. As argued by Frederic M. Biddle, a writer for the Boston Globe, “the TV ratings system really was designed with children in mind. After all, its New Year’s Day debut resembled a game of peekaboo: Now you see the transparent ratings icon in the upper left corner of your screen, now you don’t. Mostly, you didn’t” (Biddle, 12/30/96). To show the icons for only the first fifteen seconds of a program and to assume that most people will be able to see them is completely unrealistic. Most people do not watch the opening credits of programs, and, even if they did, fifteen seconds is too short a time to allow people to notice the icons. Thus, if the ratings system is to serve its purpose, the icons have to be shown for longer intervals of time and throughout the program. They should be shown at least during the first minute of the program and then for about fifteen seconds every five minutes or so, just like the networks show their identifying icons on the lower right corner of the screen.

Additionally, for the ratings to be more accurate and for parents to see them as trustworthy, parents groups and associations as well as advocacy groups should have some input on the ratings. Not only should they be allowed to give their opinions on the system itself, but each network should create a board or a group in which a number of parents give input as to how a specific program should be rated. That way, real parents will be able to give their opinions on what they see as appropriate for a child of a certain age. Among the same lines, if parents are to trust the system, there should be consistency in the ratings. If a specific program has a TV-PG rating, then all the programs in that genre should have the same rating. Presently, however, this is not the case. CBS, for instance, “rates ‘The Late Show With David Letterman’ PG, while NBC rates archrival ‘Tonight with Jay Leno’ TV-14” (Biddle, 1/6/97). If the ratings continue being this way, most of the parent will probably label them as inconsistent and unreliable and will probably discard the system as a whole. Furthermore, for the system to be completely liable, parents have to be guaranteed that their children will not watch anything that is in any way inappropriate while watching a program that is suitable for

the child's age. Thus, since commercials are not rated, there should be certain regulations as to what kinds of commercials can be shown during different programs. Otherwise, an eight year old may be watching a program rated TV-Y7, which is appropriate for his age, but may be presented with a commercial that sends out a rather dangerous message.

Finally, as of today, most networks have not made enough efforts to explain to viewers about the different ratings. Many people see the ratings for every single program they watch. However, what good does that do if they do not understand what the icons mean? I have recently noticed that ABC has started a campaign in which people are presented with the different ratings and given a toll free number where they can call if they have questions. Clearly, this is a step toward the right direction. But, in order for the system to have success, every network must organize a similar campaign. Otherwise, the icons will be there, but so will confusion and lack of understanding.

As it is, the ratings system promises many positive changes. Clearly, one system cannot solve the problem of the negative impact that television violence and sexual content have on children. One system can, however, make things better. Nevertheless, for this system in particular to have any kind of impact, it needs to go through many changes. In his comments about the new ratings system, President Clinton said that it was a step toward the right direction. At the same time, he added that "we might be able to make it better. The parents groups, the advocacy groups deserve to be heard and considered (Biddle, 12/30/96). That, in fact, is exactly what should be done. Parents, advocacy groups and viewers like myself should be heard, and our opinions should be considered and taken into account, for it is we, and not the networks, who worry about the futures of children and the impacts that television will have on their lives.

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Federal Communications Commission  
Office of Secretary

**IN THE MATTER OF:** The new television ratings.

**COMMENTS OF:** Veronica Santiago, Tufts University  
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**COMMENTS:** The new television rating system does not accomplish its goal of giving parents the necessary information about its programming due to various reasons. Among those reasons we may find that many parents prefer a content based rating system that explains the amount of violence, sexual messages, and explicit language presented.

According to Children Now "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, 1996). However, the new television ratings do not accomplish their most important goal of giving parents adequate information about its programming. They fail to achieve this primary goal due to the fact that for many parents an age based rating system seems ambiguous: it does not advise them about the content of a given show. How are parents to know what is appropriate for their children if they ignore the content of a specific show? Therefore, the new rating system denies parents the necessary information to decide what is suitable for their children to watch. It represents what networks judge to be appropriate for children and not the specific needs of the families.

The fact remains that by Congress giving the networks the responsibility of making the decision of which type of rating to apply, it is giving them as well, the responsibility of deciding which type of programming is adequate for children of different

ages. The networks' decision on the type of rating applied, which should be based on the best knowledge about what children can understand according to their development, may not reflect what many parents may consider appropriate for their own children. "While parents are concerned about violence, sexual messages, and adult language, not all parents are concerned to the same degree about the same types of material (Kunkel, 1/31/97). Thus, how can such responsibility lie in the hands of the commercial networks, when many parents differ in the types of material that children should watch?

It must also be mentioned that there is some inconsistency of ratings in different networks. For example, NBC 's "Tonight Show with Jay Leno" is rated TV-14, while "The Late Show with David Letterman" is rated by CBS as TV-PG. At the same time NBC's daytime soap operas are rated TV-14 while the episode of "Law & Order" on 1/1/97, with its explicit language and its 'skimpily clad hookers' earned a TV-PG (Biddle, 1/31/97, p D7). It is then accurate to assume that networks have different understandings of what the ratings represent. Once again, it is left to the audience to guess what is the content of each specific show, depending on which network is broadcasting the show.

However, even if such inconsistencies do exist, there is still a near-consensus of TV-PG ratings among most networks since approximately two-thirds of prime time drama has received such rating. This includes a wide variety of shows such as "Married with Children", "Melrose Place", "New York Undercover", and "Seinfeld" among many others. The vast number of TV-PG ratings in prime time television might be explained by the possibility of a TV-M stigma for commercial network television. Such stigma might have been raised by the American Family Association threatening to boycott sponsors of TV-M and TV-14 shows (Biddle, ND, p N6) Such threats leaves a system of

age-based ratings for television that “serves the needs of the television industry, but not the needs of America’s children and families” (Kunkel, 1/31/97).

In order to maximize parental use of the new rating system or a content based rating system, it is of major importance to educate the general public. It is necessary to adequately and extensively explain the new ratings to parents. Without accessible information, even a highly effective system will not serve its purpose. For example, the current system has not been adequately explained to the public and it is up to each newspaper to decide how many times they want to publish the icons. Even TV Guide which planned to present the icons from January 18 or January 25 has done so, but the data provided lacks the information that explains each specific icon (see February 15 to February 21 issue). The icons are presented as two groups in which TV-Y and TV-Y7 are for a younger audience and the rest of the icons pertain to a more general audience type in which some parental discretion may be needed. The TV Guide fails to present and explain each icon separately, therefore, it does not help to sufficiently educate a parent about the rating system.

Having already established that a content based rating system would be more appropriate, the existence of inconsistencies among networks, and the lack of information available, there still remains the issue of the length of time that the icons appear on the screen. For the most part, viewers usually do not watch every program from the beginning of the credits to the end of the show. This means that if a viewer misses the introductory credits on a given show, he or she is missing the rating of such show. This is a result of the icons only appearing on the screen for approximately fifteen seconds when

the show is starting; the same fifteen seconds it took the viewer to find the right channel for the given show they wanted to watch.

Of equal importance for the success of a new rating system is that all networks should be consistent in following its regulations. This means that all networks should rate their programs, and that such ratings be accessible in all television listings. For instance, if a person is to go through the television listings of a newspaper or TV Guide, that person should be able to know not only what shows would be on at any specific time, but also what is the rating of each show. If networks do not follow regulations and the ratings are not applied consistently there is no accurate way of a parent making an educated decision of what would be suitable for his or her child to watch.

**SUBMITTED BY:**

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CS 97-55

**IN THE MATTER OF:** The new television ratings system

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RECEIVED

APR 22 1997

Federal Communications Commission  
Office of Secretary

**COMMENTS:**

The new television ratings system implemented in the beginning of this year has instigated heated debate among parents, teachers, broadcasters, psychologists, researchers, etc. There are a variety of issues regarding the new rating system. I will discuss three of these important matters: 1. The format of the ratings. 2. The accuracy of the ratings. 3. The exposure of the ratings. I do commend the FCC for taking a step in the right direction. Unfortunately, I feel vast modifications must be made in order for the rating system to function successfully. The purpose of my letter is to express my ideas regarding the improvement of the system.

The current rating system is based on age guidelines. This is both inappropriate and ineffective. This system of ratings protects the television industry but does not serve the audiences. The age based system allows television producers to amass a variety of programs into broad categories that they define themselves. How can television producers determine which programs are appropriate for which ages? A ratings system based on contents would be more beneficial for the public. Parents should have the power to judge which programs they feel are appropriate for their children to watch based on the content of the programs. Parents should be able to know beforehand if a program contains sex, violence, or offensive language. The current ratings only inform parents of what age the television producers feel the program is appropriate for. The ratings system is supposed to help parents in the future determine which programs to block out with their V-chips. How can parents judge which programs are appropriate for their children with ambiguous ratings?

Ratings based on age may also have a tendency to actually encourage more children to watch inappropriate programming. According to research conducted by Joanne Cantor, a professor of communication at the University of Wisconsin at Madison, young kids, especially boys, are more attracted to programs categorized under "parental guidance" than programs labeled "contains violent content" (Kunkel, 1/31/97). Children are tempted to engage in activities that violate standards. Instead of inhibiting viewing or encouraging parental accompaniment, the "parental guidance" rating can actually enhance the likelihood that a child may watch a certain program. Again, a descriptive, content based rating would serve to regulate children's television viewing more effectively. Many parents do indeed feel that content based ratings would be more appropriate and effectual. A recent study by the National Parent Teacher Association revealed that 80% of parents prefer the descriptive, content based ratings (Kunkel, 1/31/97).

The accuracy of the ratings is another problematic aspect of this new system. Almost two-thirds of network prime-time dramas and nearly all of their sitcoms were rated TV PG in the first three weeks of the television rating system implementation (Biddle, p. 6). Not only is the current rating system ineffective in comparison to a system based on content, but the networks have not even made a concerted effort to use the ratings in the most accurate and appropriate manner. A report on CNN on February 12, 1997 revealed that the Parent Television Council found that 52% of programs rated TV PG contained obscenities. The rating TV PG is already ambiguous by nature, and the overuse of this second mildest rating makes it even less informative. None of the networks have made use of the most restrictive rating, M, (mature audience.) According to Dr. Rosalyn Weinman, NBC's chief censor, the first M rating on broadcast television will be NBC's airing of "Schindler's List" on February 23 (Biddle, 12/30/96). This film indeed contains sensitive material that many parents may deem inappropriate for their young children. Yet, many parents might feel this educational film is not only appropriate, but important for their children to view. Many parents might desire their children to see