The Commission notes the commitment by the Canadian Cable Television Association (CCTA) on behalf of its members to ensure that V-chips are included in digital video compression (DVC) boxes when they are made available to the public and, in the interim, to make the V-chip available in existing analog decoders or converters for approximately $1 per month. The industry has also committed to ensure that appropriate marketing and communications strategies are conducted to inform consumers about the availability of the V-chip and how to use it.

Licensees of cable and other distribution undertakings will also be responsible for ensuring that, as of September 1996, and not later than January 1997, programming on non-Canadian services distributed on their systems is encoded with a meaningful, parent-friendly rating for violence that may be read by the V-chip technology. The Commission notes the CCTA's undertakings at the hearing that the industry will work with U.S. broadcasters to ensure that their programming is rated for Canadian viewers and will ensure V-chip technology is capable of blocking out all unclassified programs. If American programming is not encoded at its point of origin, with a rating system acceptable to the Commission, distribution undertakings will be responsible for developing and implementing alternative methods for ensuring that the programming on the U.S. television signals they distribute is encoded with ratings for violence.

The rating system that is used should be informative and readily understandable to the viewer, and should consist of four to six levels. The Commission is satisfied that the rating system used in the second and current rounds of the Canadian V-chip trials meets these criteria, and provides an objective and useful indicator of program content.

The Commission designates AGVOT to develop an acceptable rating system. The development of such a system should involve input from the public, programmers and distributors, and must be submitted to the Commission for approval prior to the September 1996 implementation date. If AGVOT does not have a satisfactory V-chip decodable classification system approved by that date, the Commission will expect the licensees of programming undertakings to classify programs according to the system employed in the second and current rounds of V-chip trials.

The scope of the classification system should be responsive to the public's concerns while being practical to implement. The Commission expects classifications to be applied, at a minimum, to children's programming (programs intended for children under 12 years of age), drama, "reality-shows" (reality-based dramatic programs), feature films, promotions for any of these programs and advertisements for theatrical releases. In order to ensure the protection of children from the harmful effects of TV violence, regardless of the time at which the programming is scheduled, the programming described above should be encoded with ratings at all times. Once a classification system is in place, the licensees of individual programming undertakings will be responsible for classifying the programs they broadcast.

II. THE 1995 CONSULTATIVE PROCESS

The Commission received 232 written submissions in response to its 3 April 1995 notice of public hearing. More than 100 representations were made at regional consultations, which took place in September and October 1995 in St. John's, Moncton, Montréal, Toronto, Winnipeg, Saskatoon, Edmonton and Vancouver. Following the consultations, 35 parties appeared at a public hearing which began 11 October 1995 in the National Capital Region.

Written and oral submissions were received from a broad representation of parties concerned with the issue, including individuals, educational and media literacy organizations, anti-violence and other special interest groups, government, civil liberties associations, health and medical organizations, content providers, broadcasters, program distributors and advertisers.

Almost all who took part in the consultations and hearing, including representatives of the public and the broadcasting industry, agreed that violence in television programming has negative effects on children. Educators, in particular, remarked on an escalation of violent behaviour and desensitization to violence among children. A number of participants stressed that children who are already at risk for other reasons, such as poverty and abuse, are particularly vulnerable to the harmful effects of viewing television violence. Some participants argued that the debate is not in fact over, and that the evidence is suggestive rather than conclusive. Very few, however, suggested that no measures should be taken to address the issue.

There was also a general agreement at the regional consultations and at the hearing that the largest part of the problem in terms of violence in programming is the U.S., not the Canadian signals received in Canada. Broadcasters commented that this is due in large part to the fact that Canadian programming undertakings adhere to a strict code on violence.

TV Violence

In 1992, in response to growing public concern about violence on television, the Commission released two studies on the subject. The Commission concluded from these studies that there is a link - although not necessarily one of direct cause and effect - between TV violence and violence in society. Common to much of the research in this area is the finding that prolonged viewing by children to violence on television has three major effects. Specifically, children may become more likely to behave in aggressive or harmful ways toward others; less sensitive to the pain and suffering of others; and more fearful of the world around them.

In February 1993, at a conference dealing with television violence sponsored by the C.M. Hincks Institute, the National Action Group was formed to further examine the issue. The group, which was later renamed AGVOT, represents all components of the broadcasting industry.

AGVOT adopted its General Statement of Principles concerning the depiction of violence in television programming in September 1993. These principles include: a prohibition against the depiction of gratuitous violence; an affirmation of the responsibility that broadcasters have, in scheduling programs, to be sensitive to the concerns for children; and a commitment by licensees to provide viewers with adequate information about the subject matter of programs offered. They also include a commitment that each member of the Canadian broadcasting industry will adopt a code dealing with violence in television programming, based on the General Statement of Principles.

Efforts to provide individuals with the tools to make informed programming choices have focused on two areas: providing viewers with better information through program classification; and providing viewers with more technological control over which programs enter their homes.

The CAB code on violence makes provision for the development of an industry-wide, viewer-friendly classification system that will provide information on the content and the intended audience of programs.

For its part, the cable television industry has been involved in the development and implementation of technologies designed to give subscribers control over what programs may be viewed on their television sets.

In particular, Shaw, Rogers and CF Cable, in conjunction with some programming undertakings, have been testing the V-chip, developed by Professor Tim Collings at Simon Fraser University. This technology enables violence and other rating codes to be embedded in the video signal of a program. A suitably-equipped television set or converter allows viewers to choose a threshold level of violence that they deem appropriate for their families. The technology ensures that any program with a rating above the level selected does not appear on-screen.

Early tests of V-chip technology were undertaken in Toronto, Ottawa and Montréal in August 1995, and in Edmonton in December 1994. Shaw and Rogers are currently involved in a third round of V-chip trials, involving approximately 130 households in Victoria, Vancouver, Calgary, Ottawa and Toronto. Nine Canadian broadcasters and two American broadcasters (WUTV, a FOX affiliate in Buffalo, New York, and KVOS, an independent station in Bellingham, Washington) are participating in the current trials.

Public, Educators and Special Interest Groups

While most members of the public, educators and special interest groups supported the initiatives taken to date by the industry and the Commission, virtually all recommended that further action be taken. Several parties were skeptical about the effectiveness of industry self-regulation and urged the Commission to take regulatory action. The majority of participants, however, supported a self-regulatory approach, backed by the possibility of future regulation if it should prove necessary.

These parties also generally supported the development of program ratings and parental control technologies, such as the V-chip, to enable parents to make informed decisions about what programs are suitable for their families. AGVOT noted that, in a recent survey it commissioned, 87% of respondents supported the creation of a classification system for television programming.

The Industry Perspective

Broadcasters and some broadcasting industry groups expressed the view that violence codes and other initiatives by the industry have been effective in addressing violence contained in Canadian programming services. They also stated that the task ahead lies in addressing violence in programming on American signals, on the premise that such signals are responsible for most of the unsuitable or excessive television violence that is shown on Canadian television screens.

The primary concern of the CAB was that Canadian standards for the protection of children should be applied to all signals entering Canadian homes, and not just to Canadian signals - a principle that was widely supported by the public. The CAB supported the approach set out in the notice of public hearing, through which distributors would be required to curtail or scramble any program determined by the Commission to contravene an approved code on violence. According to the CAB, while the proposed requirement would not ensure that programming on American signals meets all provisions of the violence code, it would go a long way towardleveling the playing field.

The cable industry argued that it would be more advantageous to focus resources on providing consumers with program ratings, parental control technology and education than on implementing a curtailment or encryption regime. The CAB and the CBSC, on the other hand, contended that, while classification and the V-chip are useful tools, they should not be seen as a substitute for blocking out U.S. programs that contravene the violence code.

The CAB and others argued that a rating system should be applied to all signals that are available in Canadian homes if the system is to be a truly useful tool for parents. Members of the public supported this notion, noting that viewers do not generally distinguish between Canadian and American signals when watching television.

At the hearing, AGVOT and other industry representatives agreed that the then pending legislation in the U.S. requiring the installation of the V-chip in television sets presented a window of opportunity for Canadians and Americans to work together in developing a North American classification system.

In the event that a classification system is not implemented in the U.S., the CAB argued that the Canadian cable industry must be held responsible for ensuring that programming on the U.S. signals which it distributes is rated. The CAB indicated that it would be willing to work with distributors by sharing information on the ratings of programs aired by Canadian broadcasters.

The CCTA, however, opposed any suggestion that cable operators themselves should be obliged to rate programs or insert codes into American signals, largely because of financial and operational implications. In the event that a classification system is not implemented in the U.S., the CCTA was confident that the use in Canada of V-chip technology capable of blocking out all unclassified programs would be sufficient to persuade U.S. border broadcasters to rate their own programs in order to ensure that they are viewed in Canadian households. The Canadian broadcasting and cable industries indicated that they would work cooperatively with each other, and with their U.S. counterparts, to develop a classification system that would be in place by 1 September 1996.

The cable industry stated they were committed to make the V-chip available in existing analog decoders or converters for approximately $30 to $50, or, amortizing this amount over five years, for a cost of $1 per month. The industry committed to make the V-chip available to consumers as soon as a rating system is in place. Further, the industry stated that it will conduct marketing and information campaigns to ensure that subscribers are aware of the availability of V-chip devices, how to obtain them, and how to use them.

Nature and Scope of a Rating System

While a number of views were presented at the hearing and during consultations about the nature and scope of a classification system, most indicated that a rating system consisting of a minimum of four categories would be required (age appropriateness, violence, language and sexuality). Many members of the public and special interest groups also contended that the public, educators and advocacy groups must be consulted in the development of a rating system.

Some broadcasters, however, argued that classification should be done by exception only and that the system should thus consist of a single code that designates a program unsuitable for a general audience.

Rogers presented details regarding the 4-category (Age + V-L-S) system that has been used in the V-chip trials conducted by Rogers, CF Cable and Shaw and which was widely supported by participants in the tests. In addition to violence, the system used in the trials allowed viewers to set levels according to the intended age of the audience, and the presence of sex/nudity and offensive language.

Both the Evangelical Fellowship of Canada, based on the findings of a survey it conducted, and the Recreational Software Advisory Council, based on experience with its labeling system for recreational software, recommended that any rating system adopted should be content based.

Members of the public, educators and special interest groups generally agreed that all programs should be rated, regardless of the type of program and the time at which it is aired. The broadcasting and cable industries, on the other hand, argued that some types of programming, such as news and sports, should be exempt from classification.

Assigning Responsibility for Rating Programs

Many members of the public and special interest groups favoured the establishment of an independent body made up of parents, educational groups and social health organizations, to classify programming. Broadcasters, however, argued that maintaining the operation of such an independent body would be costly, and that the last minute delivery of programming to broadcasters would render its efforts impractical and ineffective.

The CAB and the CBSC suggested that the CBSC could play a role as a clearinghouse for the cooperative exchange and sharing of information on classifications, with a view to achieving consistency in ratings across the industry. Broadcasters and other industry representatives also recommended that the CBSC should act as an arbitrator in classification disputes.

A number of individuals and public interest groups argued that the CBSC's complaints process should be more accessible and less confusing to the public. Some participants suggested that a centralized toll-free telephone number would be helpful to viewers in registering complaints. Broadcasters pointed out, however, that this may discourage viewers from complaining directly to licensees, and that licensees are in the best position to deal with complaints from their own audiences. A number of broadcasters noted that they already have toll-free telephone numbers, and indicated that they would be prepared to publicize these numbers in public service announcements about the CBSC.

JUN 18 '97 18:38 SFU ENGINEERING

News Release

June 18, 1997

A NEW VIOLENCE CLASSIFICATION SYSTEM FOR TELEVISION PROGRAMMING: ANOTHER MECHANISM TO PROTECT CHILDREN AGAINST TV VIOLENCE

OTTAWA-HULL - In September, Canadian viewers will have the benefit of on-screen ratings to help identify the content of their television programs. An icon will appear during children's programming, drama, "reality shows" and feature films that will help parents make informed choices as to what they consider appropriate viewing for their children.

This announcement was made today by the CRTC in approving the classification system submitted on April 30th by the Action Group on Violence on Television (AGVOT) (Public Notice CRTC 1997-80).

In its Policy on Violence in Television Programming announced in March 1996, the Commission required broadcasters to implement a V-chip compatible classification system to protect children from excessive television violence; the cable industry was to be responsible for making V-chip devices available to subscribers at an affordable price.

AGVOT, which represents all sectors of the Canadian broadcasting industry, was designated to consult with the public, programmers and distributors to develop an acceptable rating system for violence, and to submit it to the CRTC for approval.

A meaningful, parent-friendly classification system

The new classification system will have six levels as well as an exempt category that uses descriptive guidelines to evaluate the content of television programs. The content evaluation results in the assignment of a rating for the intended age of the audience based on the nature and the degree of violence present in a program. Programs will be classified in the following categories:

- **Children:** programming for children under the age of 8 years;
- **Children over 8 years:** programming for children between 8-12 years old;
- **Family:** programming intended for the whole family;
- **Parental Advisory:** programming that may not be suitable for children under the age of 8 and may be inappropriate for unsupervised viewing by children 8-13 years old;
- **Over 14 years:** programming with themes or content that may not be suitable for viewers under the age of 14;
- **Adults:** programming intended for viewers 18 years and older.

In order to measure its effectiveness, the classification system was evaluated through a national public opinion survey, by 340 families who participated in field trials, and through consultations with community groups and professional associations concerned with television violence. AGVOT states that the results of all the research confirm that the system is informative and readily understandable by families.

The Commission is satisfied that AGVOT's proposal meets the criteria set out in its Policy on TV Violence, and is confident that the new classification system represents an important addition to the anti-violence code already adhered to by Canadian broadcasters.

The Canadian Association of Broadcaster's Voluntary Code Regarding Violence in Television Programming places a strong emphasis on the protection of the viewing

public, especially children, from the harmful effects of television violence.

The Code prohibits the broadcast of programming containing gratuitous violence in any form, or which sanctions, promotes or glamorizes violence. In addition, a number of sections specifically address what is acceptable in programming for children. The Code also sets a watershed hour of 9:00 p.m. before which no programming containing scenes of violence intended for adult audiences may be broadcast. Finally, the Code also requires broadcasters to air viewer advisories for programs containing violence intended for adults and for programs aired before 9:00 p.m. that contain violence not suitable for children.

The Commission notes AGVOT's intention to incorporate the violence classification system into a comprehensive rating system that will also include information about such other content elements as coarse language, nudity and sex.

Encoding and the V-chip

Although the results of the field trials indicate a positive response to the V-chip technology, AGVOT states that a number of issues need to be addressed before signal encoding and implementation of the V-chip is possible. Therefore, the broadcasting industry has proposed, as an interim measure, to display program ratings on-screen by this fall. The CRTC is satisfied that this initiative will provide a valuable service by assisting parents in making informed program choices for their families, and accepts the broadcasters' commitment to air the on-screen classification for the launch of the fall television season.

The Commission notes that French-language broadcasters in Quebec will continue to use the rating system of the Régie du cinéma.

However, the Commission expects encoding and the V-chip to be implemented as soon as an effective, affordable, user-friendly system can be made available to consumers. To that effect, the Commission will closely monitor the progress of the industry and ensure that all necessary efforts have been made to achieve this goal.

The Commission commends AGVOT for its considerable efforts in the development of this classification system, and acknowledges its wish to continue the positive, cooperative approach that will best meet the public's needs.

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Contact: CRTC Public Affairs, Ottawa, K1A 0N2
Tel: (819) 997-5427, TDD: (819) 994-0423, Fax: (819) 994-0218

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Content Advisory System for the ATSC Digital Television Standard

by
Bernard J. Lechner
Consultant
Princeton, New Jersey

The digital television transmission system defined by the ATSC Digital Television Standard is an extremely flexible system, especially when it comes to transmitting ancillary data related to television programs. As such, it can readily support a multi-region, multi-dimensional content advisory system. ATSC Specialist Group T3/S8, the group responsible for the Service Multiplex and Transport Systems Characteristics section of the ATSC Digital Television Standard, is working on the definition of a specific method to transmit content advisory information.

Each television program that is carried by an ATSC digital channel is identified with a Program Map Table (PMT) which must be transmitted at least every 400 milliseconds (at least 2 ½ times per second). The Program Map Table contains information the receiver needs to decode the particular program. It can also contain descriptors that provide information about the program. This is the ideal place to include a Content Advisory Descriptor that will carry content advisory information for the particular program.

Rather than defining a fixed system under which the Content Advisory Descriptor in the PMT would be interpreted, the system being considered by the T3/S8 Specialist Group is based on downloading two tables to the receiver. These tables are transmitted elsewhere in the digital stream and are captured and stored by the digital television receiver. Since they are not expected to change frequently, the tables need not be transmitted very often -- once per minute is the current proposal -- and a receiver need not check them very often -- when first installed and then perhaps once per day.

The first of the two tables, called the Rating Region Table (RRT), defines one or more rating regions. This would allow the same program to be rated differently in different regions using the same rating system or it would allow different rating systems to be used in different regions. This could be a useful feature in border areas of North America where receivers have access to programs from two different countries. The concept of regions can also be used to distinguish between different delivery media within the same geographic area, e.g., terrestrial broadcast and cable television within the United States. Thus, a "cable-ready" digital television receiver could easily accommodate the use of different rating systems by terrestrial broadcasters and cable television networks.

The second table, called the Rating Text Table (RTT), actually defines the rating system. If more than one region is in use, there will be multiple Rating Text Tables, one for each region. As currently proposed, up to six separate rating dimensions may be defined. The

MPAA rating system is a single rating dimension. The HBO system with separate categories for sex, violence and language requires three rating dimensions. Up to 15 rating levels may be defined for each dimension. The Rating Text Table also includes the name for each dimension and the text string that describes each level with an abbreviation, if appropriate.

Since both the Rating Region Table and the Rating Text Table are downloaded to the receiver, it is possible to add or delete regions and to change the rating dimensions and/or the definitions of the levels within each dimension at any time in the future. Table 1 provides an example of a possible Rating Region Table and Table 2 provides an example of a possible Rating Text Table.

The Content Advisory Descriptor associated with each program specifies the region or regions for which rating information is being provided and provides the level for each of the 6 rating dimensions for each region. The digital television receiver then uses the previously captured and stored Rating Region Table and Rating Text Tables to interpret the contents of the Content Advisory Descriptor. The current proposal also provides space in the Content Advisory Descriptor for an optional text string that might be used to further describe the rating.

Rating Region	Rating Region Name
0	United States
1	Canada (Quebec)
2	Canada (Outside Quebec)
3	Mexico

Table 1 - Example of Rating Region Table

RATING REGION		UNITED STATES	
Rating Dimension	Rating Dimension Name	Level	Definition
0	MPAA	0	--
		1	General Audiences (G)
		2	Parental Guidance Suggested (PG)
		3	Parents Strongly Cautioned (PG-13)
		4	Restricted (R)
		5	No Children under 17 (NC-17)
		6	Not Rated (NR)
		7	Adult, No One Under 18 (X)
1	Comedy Rating	0	--
		1	Not Funny At All
		2	Some Giggles
		3	Mildly Funny
		4	Hilarious
2	Drama Rating	0	--
		1	Not at All Serious
		2	Light Drama
		3	Heavy Drama
		4	A Real Tear-Jerker
3	--	0	Not Currently Defined
4	--	0	Not Currently Defined
5	--	0	Not Currently Defined

Table 2 - Example of a Rating Text Table

RSAC Recreational Software Advisory Council

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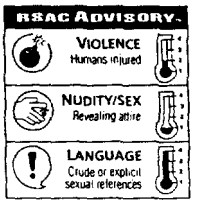
Executive Director Stephen Balkam

FCC Hearings on the Television Ratings System

Stephen Balkam
Executive Director
Recreational Software Advisory Council

June 20, 1997



Phone: 617. 860. 9888 **Fax**: 617. 860. 9604 **Net**: www.rsac.org **e-mail**: rsacinfo@rsac.org 1050 Waltham Street Lexington, MA 02173

Introduction

My name is Stephen Balkam and I am the Executive Director of the Recreational Software Advisory Council, an independent, non-profit organization based in Washington, DC. I would like to thank the Commission for the invitation to speak to you today on the subject of TV ratings and what RSAC has developed in the field of content labeling and parental advisories.

RSAC's mission is to empower the public, especially parents, to make informed decisions about electronic media by means of an open, objective, content advisory system. We began in the summer of 1994 rating computer games and in the spring of last year, we launched RSAC*i*: RSAC on the Internet. We have quickly established ourselves as the leading rating system on the Web and Internet users around the world are taking up our system.

Our involvement with the TV ratings issue dates back to January 1995 with our first meetings with Senator Kent Conrad's office and an involvement in various children and media coalitions. I spoke at the town hall meeting, the Family and the Media, chaired by Vice President Gore in the summer of '95. I have met with Chairman Hundt on several occasions over the past two years to discuss this issue and had the opportunity to meet with Jack Valenti and others of the broadcast Implementation Group during their deliberations last year.

As time is short, I will restrict my remarks to three points:

1) People want to know what they are getting; whether it's in a can of soup, a computer game or a TV soap.

2) Objective, labeling of content already exists and is widely used in the purchase of recreational software and in the screening of web sites.

3) The TV industry's age-based system could be adapted to include levels of Sex, Language and Violence with descriptors to give more information about a programs content and to more fully utilize the potential of V-Chip technology.

Consumer Information

Consumers want clear, concise and reliable information about what they purchase, what food they eat, what clothes they wear and which movies they or their children watch. Consumer or parental advisories are a healthy sign that an industry or an individual

company takes its customers seriously and in an honest and straightforward way, provides objective and reliable information upon which people can make a choice.

It is no surprise that parents and ordinary television viewers should demand clear and objective information about the television shows they and their children watch. Particularly as many parents (myself included) are unable to supervise their children's choices, twenty-four hours a day. The call for content labeling for television shows is merely an extension of the widely heralded and much lauded consumer movement of the past three decades. It's force has been felt in industry after industry. It is usually met with resistance by the companies involved, then government threatens legislation and, in most cases, a voluntary code or system is devised that accommodates most people's needs.

The RSAC rating system

Three years ago, the software industry felt the heat of consumer concern and threatened legislation when Senator Lieberman of Connecticut raised the issue of violence in computer and video games. The Software Publishers Association together with others in the industry rallied to the call and created the organization that I represent and a new kind of rating system. We decided not to emulate the age-based, movie-rating model, but instead took the FDA food labeling system as our inspiration. We developed three categories, Violence, Nudity/Sex and Language with levels 0 to 4, 0 being the least offensive and 4 the most extreme. We added descriptors to give even more information. Thus *Doom* scores a Violence level 3 with the descriptor "Blood and gore". The finished product is then labeled thus and a parent can decide whether or not they feel this particular product is suitable for his or her child.

The RSAC system is a self-rating system based on a carefully constructed questionnaire with clear definitions and examples for each level in each category. Thus a computer game producer or the webmaster of a web site goes through the questionnaire declaring what levels of material is to be found in their product or internet site. In the case of RSAC*i*, our rating system for web sites, a webmaster comes to our site www.rsac.org and fills in form giving us their details, answers the questions in the four categories and then agrees to our Terms and Conditions. The resultant html tag is then placed in the header of the person's web site and that is read by a browser such as Internet Explorer. Within Microsoft's browser is a control called Content Advisor and it is there that the parent can set the levels in the four categories depending on what they deem to be appropriate for their children. This feature is often referred to as the "virtual V-Chip" and it acts in a very similar way to the proposed V-Chip for television.

In just over a year 35,000 web sites have rated with RSAC*i* at a rate of over 200 sites per day – primarily from the US, but also from countries all over the world. We have received letters of thanks, congratulations and expressions of relief from parents, teachers and employers that such a system exists and is fast catching on as a standard on the internet. Content labeling is not only possible, it is also desirable and the fruits of our efforts are available to other media, including television.

Adapting the TV industry's rating system

I'm not saying we have all the answers. Nor am I saying that this is easy. But it is possible with a little effort and some ingenuity to construct a rating system for television that provides considerably more information than the current system **and** to construct an open, objective, ratings questionnaire that can be quickly and easily used within the television industry to create the content advisories that the public desire.

The TV rating system has great potential for also being a content advisory system. If you look at the chart marked "TV Content Advisory Ratings" you will see how the TV system could be expanded to include rating levels from 0 to 3 corresponding to the four categories of TVG, TVPG, TV14 and TVM. In addition, descriptors could be added to give parents more information about each of the three categories of Violence, Sex and Language. These descriptors are the ones used in the publicity material distributed by the TV industry to educate the public about the new system.

The resultant labels could be shown at the beginning of the program, listed in newspaper and TV guides and, as the V-Chip technology is introduced, parents could more accurately screen out material based on the detailed content advisories contained in the program signal.

The content advisories could be reached through use of a highly specific questionnaire (see the RSAC*i* questionnaire attached) and thus a more consistent approach could be attained across the industry. A Review Board made up of industry representatives and experts from the fields of education, psychology, medicine and others could adjudicate on individual appeals and conduct periodic reviews and updates of the ratings methodology.

Our organization would be willing to put its energies and expertise to help create such a system. Not only would it provide more detailed information about a program's content, it would mirror what parents and teachers are already using to screen out objectionable material on the Internet.

TV CONTENT ADVISORY RATINGS

Levels	Violence	Sex	Language	
0	None	None	None	**TVG**
1	Limited	Suggestive	Mild	**TVPG**
2	Intense	Sexual content	Strong	**TV14**
3	Graphic	Explicit	Profane	**TVM**

Recreational Software Advisory Council

RSACi Ratings Questionnaire

Nudity

In order to determine the level of nudity, if any, in your content, please go through the checklist of very specific terms about how nudity is portrayed. Definitions are provided for all terms that must be understood to make the determinations necessary to answer the questions. The definitions are highly specific and the objectivity of the labeling system depends on using them correctly.

Moving through the list below in order from top to bottom, please click the first button of the content descriptor that applies to your content. Does your content portray:

(n4) **frontal nudity that qualifies as a provocative display of nudity**
(n3) **frontal nudity**
(n2) **partial nudity**
(n1) **revealing attire**
(n0) ● **none of the above**

Submit Answer

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Recreational Software Advisory Council

Definitions for RSACi Nudity Questions

PORTRAYAL
Any presentation including, but not limited to, pictures, no matter how crudely drawn or depicted, written descriptions, oral recitations and or audio sounds.

HUMAN or HUMAN-LIKE BEINGS
Any sentient being, no matter how portrayed (photographed or drawn) or how crudely drawn (including stick figures) understood by any reasonable person as human or humanoids in form including alien sentient beings that have human-like form (head AND arms AND torso AND legs AND walking upright).

NUDITY
Any portrayal of a human's buttocks (other than the exception below), genitalia, or female breasts, or of humanoid genitalia or female breast(s), including such portrayals as see-through blouses, the pasties of a topless dancer, or other types of clothing which do not prevent exposure of those parts of the body. This definition also includes nudity in widely recognized works of art and nudity in documentary context. **NOTE**:
An exception is made for portrayals of the buttocks of characters which a reasonable person would consider as BOTH (a) something other than a true human being or representation thereof, AND (b) a character that normally is expected to be unclothed and whose natural state is undressed. If the portrayal is such that it would not cause a reasonable person to comment upon or take notice of the exposed buttocks, then, for this one exception, the characters require no rating for nudity.

PROVOCATIVE DISPLAY OF FRONTAL NUDITY
Any portrayal of genitalia that might reasonably imply sexual arousal, or the display of frontal nudity in what might be reasonably considered a sexual context.

FRONTAL NUDITY
Any portrayal of a nude sentient being which shows pubic hair or genitalia, excluding known animals in their natural state of undress.

PARTIAL NUDITY
Partial nudity is a subset of nudity. Any portrayal of a human buttocks or female breasts, or of humanoid female breast(s), including such portrayals as see-through blouses and other types of clothing which do not prevent exposure of the body and portrayals with minimal covering, such as pasties on the breasts of a topless dancer. In the case of non-humans, portraying buttocks does not constitute partial nudity IF AND ONLY IF one can surmise that the creature is natural state is undressed.

REVEALING ATTIRE
Any portrayal of a human/humanoid that does not portray nudity, yet portrays outlines through tight clothing, or clothing that otherwise emphasizes male or female genitalia, female nipples or breasts (including the display of cleavage that is more than one half of the possible length of such cleavage), or clothing on a male or female which a reasonable person would consider to be sexually suggestive and alluring.

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RSACi Ratings Questionnaire

Sex

In order to determine the level of sexual activity, if any, in your content, you will be asked to go through a checklist of very specific terms about how sex is portrayed. Definitions are provided for all terms that must be understood to make the determinations necessary to answer the questions. The definitions are highly specific and the objectivity of the labeling system depends on using them correctly. You are urged to review the definitions before submitting your answer.

Moving through the list below in order from top to bottom, please click the first button of the content descriptor that applies to your content. Does your content portray:

(s4) **sex crimes**
(s4) **explicit sexual acts**
(s3) **non-explicit sexual acts**
(s2) **non-explicit sexual touching**
(s2) **clothed sexual touching**
(s1) **passionate kissing**
(s0) **innocent kissing or romance**
(s0) • **none of the above**

Submit Answer

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Definitions for RSACi Sex Questions

PORTRAYAL
Any presentation including, but not limited to, pictures, no matter how crudely drawn or depicted, written descriptions, oral recitations, and or audio sounds.

HUMAN or HUMAN-LIKE BEINGS
Any sentient being, no matter how portrayed (photographed or drawn) or how crudely drawn (including stick figures) understood by any reasonable person as human or humanoids in form including alien sentient beings that have human-like form (head AND arms AND torso AND legs AND walking upright).

SEX CRIMES
Any portrayal of unwanted, unauthorized, or otherwise non-consensual sexual acts forced upon one sentient being by another sentient being (rape). Any portrayal of explicit or non-explicit sexual acts, consensual or not, between a human or human-like being that a reasonable person would consider as being under the age of 18, and another human or human-like being that a reasonable person would consider over the age of 18. Any portrayal of sex, consensual or not, between an animal and a human or human-like being (bestiality).

EXPLICIT SEXUAL ACTS
Any portrayal of sexual activity that a reasonable person would consider as more than just non-explicit sexual activity because it shows genitalia. This includes any portrayal of sexual activity by one human or human-like being, or among multiple humans, including, but not limited to masturbation and sexual intercourse of any kind (oral, anal vaginal), that shows genitalia.

NON-EXPLICIT SEXUAL ACTS
Any portrayal of sexual activity that a reasonable person would consider as more than just clothed sexual touching or non-explicit sexual touching, either by one human or human-like being or among multiple humans, including, but not limited to masturbation and sexual intercourse of any kind (oral, anal, vaginal), that may show nudity, but does not show genitalia. Non-explicit sexual activity includes sound on an audio track, such as the kinds of groans, moans, and other sounds that to a reasonable person would imply sexual activity was taking place.

NON-EXPLICIT SEXUAL TOUCHING
Any portrayal of any touching between or among humans or human-like beings, that a reasonable person would consider more than just passionate kissing, including but not limited to such things as groping, petting, licking, and rubbing, that falls short of intercourse (sexual, oral, or otherwise), and that does show bare buttocks or female breasts, but does NOT show genitalia. Non-explicit sexual touching does NOT include non-explicit or explicit sexual acts as defined above and does NOT include masturbation.

CLOTHED SEXUAL TOUCHING
Any portrayal of any activity or touching between or among humans or human-like beings, other than innocent kissing and passionate kissing, that falls short of intercourse (sexual, oral, or otherwise) or masturbation, and that does NOT show bare buttocks, female breasts, or genitalia, but that any

reasonable adult would perceive as sexual in nature. This includes but is not limited to such things as groping, petting, licking, rubbing. Non-explicit sexual touching does NOT include non-explicit or explicit sexual acts as defined below and does NOT include masturbation.

PASSIONATE KISSING
Any portrayal of humans or human-like creatures kissing that a reasonable person would consider more than just innocent kissing. This includes any kissing during which tongues touch (or mouths are obviously open), and any kissing on, but not limited to, the neck, torso, breasts, buttocks, legs.

INNOCENT KISSING
Any portrayal of humans or human-like creatures which a reasonable person would consider as just kissing on lips (without touching of tongues), head, shoulder, hands or arms, but not any other areas including but not limited to neck, breasts, torso, or legs. Innocent kissing shows affection and/or love, but creates no reasonable perception of stronger sexual activity as defined in this methodology.

ROMANCE
Portrayals of activity showing love and affection with NO stronger sexual contact as defined in this methodology. This might include embraces, hugging, innocent kissing, holding hands, etc.

Please click the back button when you are finished.

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RSACi Ratings Questionnaire

Language

In order to determine the appropriate advisory level for language, you will be asked to go through a checklist of very specific terms to determine whether or not your content contains language, expressions, images, portrayals, etc., which some viewers might potentially consider objectionable. The RSACi rating addresses two kinds of speech; 'hate speech' and 'objectionable speech'; that is, language ranging from mild expletives or profanity to crude, vulgar, and obscene statements and gestures. You are urged to review the Definitions before submitting your answer.

Moving through the list below in order from top to bottom, please click the first button of the content descriptor that applies to your content. Does your content portray:

(14) **crude, vulgar language**
(14) **explicit sexual references**
(14) **extreme hate speech**
(14) **epithets that advocate violence or harm against a person or group**
(13) **strong language**
(13) **obscene gestures**
(13) **hate speech or strong epithets against any person or group**
(12) **profanity**
(12) **moderate expletives**
(11) **non-sexual anatomical reference**
(11) • **mild expletives**
(11) **mild terms for body functions**
(11) **slang**
(10) **none of the above**

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Definitions for RSACi Language Questions

GUIDING PRINCIPLE
The construction of a list of every word, action, innuendo, and gesture that a reasonable person would consider as crude, slang, profane or explicit is a never-ending task. Times change. Words change. Gestures change. New street slang is constantly evolving. Language considered inoffensive in one culture may be considered vulgar in another culture. It is therefore your responsibility to properly interpret and classify any slang, profanity or vulgarity according to the usage in the title and the general category definitions below. Words or expressions in the title that fit a definition or categorization, but do not appear on a word list, should be treated as if they do appear on the list.

CONTAIN
The inclusion of specific content in any form or manner, including but not limited to printed words, written descriptions, oral recitations, and other audio sounds.

CRUDE LANGUAGE; EXPLICIT SEXUAL REFERENCES
Crude references, direct or indirect to intercourse: Fuck, bugger, mother-fucker, cock-sucker, penis-breath. Crude references to genitalia: prick, cock, pussy, twat, cunt. Explicit street slang for intercourse or genitalia.

EXTREME HATE SPEECH
The combination of vulgar language with hate speech or epithets; advocating violence or harm against a person or group.

HATE SPEECH
Any portrayal (words, speech, pictures, etc.) which strongly denigrates, defames, or otherwise devalues a person or group on the basis of race, ethnicity, religion, nationality, gender, sexual orientation, or disability is considered to be hate speech. Any use of an epithet is considered hate speech. Any description of one of these groups or group members that uses strong language, crude language, explicit sexual references, or obscene gestures is considered hate speech.

EPITHET
A disparaging or abusive word or phrase used in the place of the name of any person or group. There are many examples of slang terms which, in any given historical period, function almost exclusively as epithets: e.g., honky, nigger, coon, spic, greaser, chink, slant, faggot, etc. In addition, sometimes a word which is not in and of itself an epithet functions as one because of context. For example, in some contexts the word "pig" may be used in place of "police officer," thus becoming an epithet. In other contexts, and at different times, the word "monkey" has been used as an epithet to refer to individuals of Asian descent and to individuals of African descent.

OBSCENE GESTURES
Any visual or described gestures, body movements, such as flipping the bird, mooning, non-verbal indications of sexual insult, etc., indicating any of the above. Any visual or described innuendo, euphemisms, street slang, double-entendre for any of the above.

STRONG LANGUAGE

Strong, but not crude, language for genitalia: asshole, butthole, dork, dong, pecker, schlong, dick. Strong language for bodily functions or elimination: Shit, piss, cum, asswipe, buttwipe. Strong language for sexual functions or intercourse: jerk-off, balling, shtupping, screwing, boffing, cumming.. References to genitalia used in a sexual setting including the use of penis, vagina, rectum, semen.

PROFANITY
To treat something regarded as sacred with abuse, irreverence, or contempt. to use the name of a deity with contempt or as a curse.

MODERATE EXPLETIVES
The words bastard and bitch (when used as epithets rather than biological terms), son-of-a-bitch, turd, crap.

MILD EXPLETIVES
The words hell and damn, ass and horse's ass, BUT NOT asshole, assface, asswipe; butthead and buttface BUT NOT butthole and buttwipe.

NON-SEXUAL ANATOMICAL REFERENCES
Words such as penis, vagina, rectum, semen used in a non-sexual context.

MILD TERMS FOR BODY FUNCTIONS
Words such as piss and poop not used in a sexual context.

SLANG
No profanity, expletives, vulgar gestures, innuendo, double-entendre, vulgar street slang other than listed below.

A. Inoffensive slang: darn, drat, golly, gosh, dang, rats, sheesh, geeze, gee wiz.

B. Screw to indicate cheated or harmed, BUT NOT screw in any sexual context.

C. Butt to indicate one's rear end as in "get your butt out of here, or "I'm going to paddle your butt," or "he fell on his butt.," BUT NOT butthead, butthole, buttface, buttwipe, etc.

D. Ass when referring to the animal, but not "Horse's ass."

E. Dork used in a non-sexual context as in, "He's a dork."

F. Sucks used in a non-sexual contest as in, "That sucks," or "He sucks."

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RSACi Ratings Questionnaire

Violence

In order to determine the level and type of violence, if any, in your content, you will be asked to go through a checklist of very specific terms about whether and how violence or its consequences are depicted. Definitions are provided for all terms which you need to understand in order to make the determinations necessary to answer the questions. The definitions are highly specific, and the objectivity of the system depends on using them carefully and correctly. You are urged to review the Definitions before submitting your answer.

Moving through the list below in order from top to bottom, please click the first button of the content descriptor that applies to your content. Does your content portray:

(v4) **wanton, gratuitous violence**
(v4) **extreme blood and gore**
(v4) **rape**
(v3) **blood and gore**
(v3) **intentional aggressive violence**
(v3) • **death to human beings**
(v2) **the destruction of realistic objects with an implied social presence**
(v1) **injury to human beings**
(v1) **the death of non-human beings resulting from natural acts or accidents**
(v1) **damage to or disappearance of realistic objects?**
(v0) **sports violence**
(v0) **none of the above**

Submit Answer

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