

Recreational Software Advisory Council

Definitions for RSACi Violence Questions

PORTRAYAL

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

THREATENING

The portrayal of the intention to inflict harm, injury, evil on another being. Something that a reasonable person would consider to be menacing to another's safety or well-being.

WANTON, GRATUITOUS VIOLENCE

The visual portrayal of the continuation of intentional aggressive violence that causes damage/harm/death to any sentient being once that being has been rendered helpless and/or non-threatening, such as physical torture, continued attacks on or damage to corpses, dismembering or eating a corpse.

EXTREME BLOOD/GORE:

The visual portrayal of living beings being torn apart or slaughtered, dismembered body parts.

RAPE

The portrayal (video, audio, or written) of any unwanted/unauthorized, non-consensual sexual intercourse, whether vaginal, anal, oral, or fondling, forced upon a sentient being by another sentient being(s). In any sexual or sexually suggestive interaction, "No" is assumed to mean "No."

BLOOD / GORE

The visual portrayal of blood splashing, pools of blood on the ground, objects or persons smeared or stained with blood.

INTENTIONAL AGGRESSIVE VIOLENCE

The existence of a threat or the actual carrying out of threatening actions that directly or indirectly cause, or if successful would cause, physical harm, damage, destruction, or injury to a sentient being or realistic object. This includes the visual portrayal of the results of aggressive violence including, but not limited to dead bodies, damage, audio distress, etc., even if the violent act itself is not shown. It does not include psychological attacks. but is limited to physical harm, damage, destruction, and injury. possible to have a credible threat which does not cause a change in behavior.

IMPLIED SOCIAL PRESENCE

The presumption, unless a reasonable person would clearly think otherwise, that a realistic object is inhabited, or carrying, or concealing humans, even though the humans have not been seen or heard.

SPORTS VIOLENCE

Competitive sports games such as football, basketball, car racing, sumo wrestling, etc. have many elements of violence but are not intentional aggressive violence. It is still sports violence if players or participants are shown carried off the field, conscious or unconscious, even though on a stretcher, unless there is death, dismemberment, or blood and gore involved.

Note: Sports violence does NOT include wrestling, boxing, street fighting, karate, etc. games if the

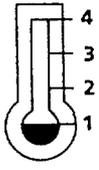
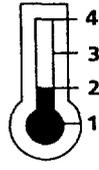
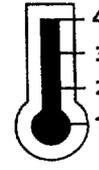
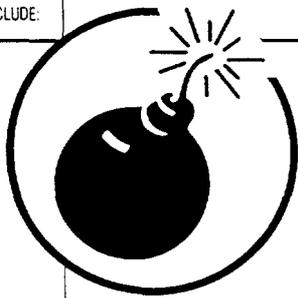
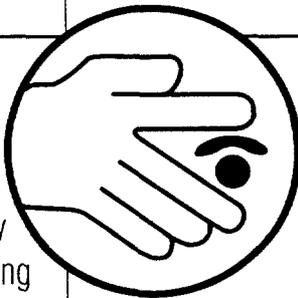
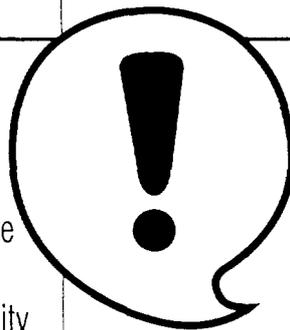
intended goal is to hurt or render the opponent unable to function. These actions are considered as intentional aggressive violence. A fight within a sports game, such as during a hockey game, would also be considered intentional aggressive violence. Definitions for Violence Rating: PORTRAYAL: Any presentation including, but not limited to pictures, no matter how crudely drawn or depicted, written descriptions, and/or oral recitations, and/or audio sounds.

Please click the back button when you are finished.



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The Recreational Software Advisory Council informs consumers about the content of software games using the symbols shown below. These symbols appear along with more specific information about each category as labels on software packaging.

<p>ALL SUITABLE FOR ALL AUDIENCES CONTENTS MAY INCLUDE:</p>	 LEVEL 1	 LEVEL 2	 LEVEL 3	 LEVEL 4
<p>Harmless conflict; some damage to objects</p>	 <h2 style="margin: 0;">VIOLENCE</h2>			
<p>No nudity or revealing attire / Romance; no sex</p>	 <h2 style="margin: 0;">NUDITY/SEX</h2>			
<p>Inoffensive slang; no profanity</p>	 <h2 style="margin: 0;">LANGUAGE</h2>			

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Stephen Balkam

Biographical Details

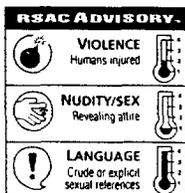
Stephen Balkam is the Executive Director of the Recreational Software Advisory Council, an independent, non-profit organization. It is RSAC's mission to empower the public, especially parents, to make informed decisions about electronic media by means of an open, objective, content advisory system.

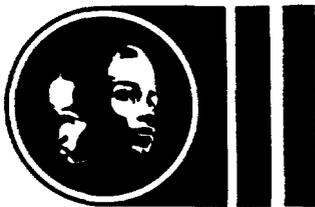
Born in Washington D.C., Stephen lived much of his adolescence and adult life in Great Britain. After a degree in Psychology, he worked for Burroughs Machines in their European headquarters. Following a spell with a sport-sponsorship PR firm, Stephen became the Center Manager of the InterAction Center in north London, a multi-media, community center. He was then recruited as House Manager of the Institute for Contemporary Arts in the Mall, central London.

In the mid eighties, Stephen moved to become Director of the Camden Community Transport project and then General Secretary of the Islington Voluntary Action Council - an umbrella body for the 900 non-profit organizations in that part of London. After three successful years heading IVAC, he was named Director of the National Stepfamily Association of Great Britain.

Before taking up his role as the first Executive Director of RSAC, Stephen ran his own consultancy business in the UK and US, specializing in strategic planning and board development. He served on many boards, including the National Council for Voluntary Organizations and Councils for Voluntary Service, National Association.

A parent and a stepparent, Stephen brings considerable personal and professional experience and expertise to the ambitious project of establishing and promoting a rating system for interactive computer games, the Internet, television and other media. He regularly appears on TV, radio and in the press advocating the adoption of RSAC's unique rating system. He lives in Washington, DC with his wife and family.





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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**TESTIMONY
OF
EVELYN K. MOORE
PRESIDENT OF THE NATIONAL BLACK CHILD DEVELOPMENT INSTITUTE**

**SUBMITTED TO
THE CHAIRMAN AND COMMISSIONERS
OF THE
FEDERAL COMMUNICATIONS COMMISSION**

**FOR THE *EN BANC* HEARING ON
THE VOLUNTARY VIDEO PROGRAMMING RATING SYSTEM
AND
THE VIDEO PROGRAMMING BLOCKING TECHNOLOGY (THE V-CHIP)**

FRIDAY, JUNE 20, 1997

SUMMARY

On April 3, 1997, the National Black Child Development Institute (NBCDI) submitted comments to the Federal Communications Commission (FCC) on the voluntary video rating system and the video programming blocking device known as the V-chip. As an organization serving to promote the well-being of African American children and their families, NBCDI has had a steady and active interest in the television viewing habits of children, the nature of television programming, and the involvement of parents in establishing television guidelines for their children. Traditionally, parents have had limited information on which to base their guidelines. Short of watching every television program that airs, there has been no other reliable way of accessing a program's content, let alone any way of getting the information in advance. At best, the lack of a legitimate rating system has resulted in a blind selection process with a high margin of error; or, at worst, a process so inadequate as to deter parents from attempting to supervise their children's television viewing.

Thus, NBCDI considered the **Telecommunications Act of 1996** a tremendous step in the direction of empowering parents to make informed and timely decisions about what their children watch on television. The letter and spirit of the law, as summarized in section 551(a)(9), seemed clear and appropriate. With the proliferation of violent, sexually explicit and profane television fare, a system and a device respectively designed to codify programming content and block undesirable tele- and cable-cast was well in order.

To our disappointment, however, the voluntary rating system jointly proposed by the National Association of Broadcasters, the National Cable Television Association, and the Motion Picture Association of America fails to comply fully with the parental choice and empowerment guarantees provided by the Telecommunications Act. The system, entitled the **TV Parental Guidelines**, essentially evaluates programming based on age criteria without substantive consideration of program content.

NBCDI, in our comments to the FCC, presented six recommendations for improving the efficacy of the rating system and bringing the system into compliance with the Telecommunications Act. The recommendations are reiterated in the following testimony.

We appreciate this opportunity to express our belief that the **TV Parental Guidelines** need to be reformed through a process that includes the full involvement of public interest groups representing children and parents. In addition, NBCDI encourages the FCC to create an advisory committee authorized to assist the Commission with determining the acceptability of the current system. The Telecommunications Act permits the establishment of such a committee. We hope it is the will of the FCC to avail of that opportunity.

TESTIMONY

Thank you, Chairman Hundt and Commissioners of the Federal Communications Commission, for inviting me to testify at this hearing on the voluntary video programming rating system and the video programming blocking device known as the V-chip. I am Evelyn K. Moore, president of the National Black Child Development Institute. For twenty-seven (27) years, NBCDI has existed to promote and protect the well-being of African American children. Currently, we have more than eighty-thousand (80,000) supporters and forty-four (44) affiliate chapters nationwide.

Today, I represent the millions of African American children who watch television and the millions of African American parents who care about the influence television has on their children's lives. The data tell us that African American children watch television more than any other single group in the United States. The data also tell us that the poorer you are, the more television you watch. And Black children are disproportionately poor. We also know from research that the violence children witness on television in their early childhood can be played out at a later developmental stage. Moreover, we know that our nation's young children are exposed to some eight-thousand (8,000) murders and one-hundred-thousand (100,000) acts of violence on television by the time they complete elementary school.

Evelyn K. Moore
National Black Child Development Institute
June 20, 1997

These findings should compel the nation to do right by our children: 1) To provide television programming that both enhances their development and entertains them and 2) to provide parents with the appropriate information and tools to supervise their children's television viewing. The V-chip is a good start. The *TV Parental Guidelines* are a false start. Without an effective rating system, the V-chip is hardly useful. That is to say, while the V-chip can be activated with the existing rating system, its capacity to empower parents to block undesirable programming is currently compromised.

I come before you today to advocate for a content-based rating system for America's children. More specifically, I am calling for reforms to the rating system on behalf of African American children whose life situations often place them in front of the television. They get up in the morning and turn on the TV. When they come home from school, it is often their babysitter. A legitimate rating system, used with the V-chip, could end the overexposure to harmful programming almost singularly experienced by Black children.

The National Black Child Development Institute recognizes that in order for any television rating system or compatible technology to work, parents must be front and center, serving as the P-Chip. To function in that primary role, mothers and fathers need timely and substantive information on programming content. The

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National Black Child Development Institute
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Telecommunications Act of 1996 acknowledges and addresses that need. Specifically, section 551--entitled ***Parental Choice in Television Programming***--states there is a compelling governmental interest in:

"Providing parents with timely information about the nature of upcoming video programming and with the technological tools that allow them easily to block violent, sexual, or other programming that they believe harmful to their children."

Unfortunately, the ***TV Parental Guidelines*** fail to heed that clear-cut message. The system jointly proposed by the National Association of Broadcasters, the National Cable Television Association, and the Motion Picture Association of America does not enable parents to make an informed and timely decision about what their children watch.

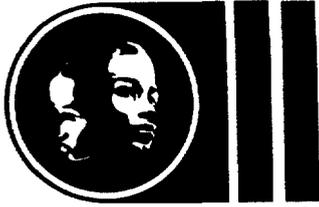
I would like to recommend six (6) corrective actions: First, the system needs to rate program content sufficiently. Parents need to know the degree and nature of a program's sexual, violence and language content. Second, the rating icon needs to appear not only before the program but during each commercial to insure it can be noted by parents. Third, television listings should be required to publish program ratings so that parents can make advance decisions about what programs to block.

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National Black Child Development Institute
June 20, 1997

Fourth, commercials advertising television programs which are unadvisable for children should not be allowed to air during television programs that are suitable for children. Provocative thirty- and sixty-second spots can capture the attention of children and inadvertently expose them to harmful material. Fifth, network affiliates should be required to maintain a given rating and should not be allowed the option of changing a rating at their sole discretion. The current flexibility provided by the voluntary system infringes on the right of parents to receive reliable, standard programming information. Sixth, the Oversight Monitoring Board should include representatives of child and parent advocacy organizations to insure ongoing protections for children's television viewing.

I would like to conclude my testimony by acknowledging the reported plans by Fox, ABC, and certain cable networks to implement a more content-based system. I hope their intentions prevail industry-wide. I also want to commend you, Chairman Hundt, for using the authority of your office to serve the best interest of children. I thank each Commissioner for this opportunity to speak on behalf of African American children and the National Black Child Development Institute.

Evelyn K. Moore
National Black Child Development Institute
June 20, 1997



NATIONAL
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EVELYN K. MOORE

Evelyn K. Moore is president and chief executive officer of the National Black Child Development Institute (NBCDI), one of the nation's foremost organizations serving African American children and their families. She co-founded NBCDI in 1970 and is widely recognized for her visionary leadership of the organization.

Under Ms. Moore's direction, NBCDI has developed a national affiliate network comprising 44 volunteer chapters that provide direct services at the community level. The Institute also offers leadership training, research, and advocacy in the areas of early care and education, elementary and secondary education, child welfare, and health. Through its programs, NBCDI serves a resource to African American children and families and those who work on their behalf.

Before joining the Institute, Ms. Moore worked at the University of Michigan in Ann Arbor as special assistant to Wilbur S. Cohen, former secretary of the U.S. Department of Health, Education and Welfare. She holds a master's degree in education from the University of Michigan and maintains an active writing and speaking schedule on topics related to the welfare of children.

Many national, state, and local organizations have acknowledged Ms. Moore's outstanding work promoting the well-being of African American children and their families. She has received the Black History Month Program Award from the National Science Foundation, the F. Edward Johnson Achievement Award for Outstanding Service to Children from the Advisory Council of the African Development Foundation, and the Youth Services Award from the National Black Heritage Observance Council. She also has received the Solomon Carter Fuller Award from the American Psychiatric Association. In recognition of her exceptional achievement in advancing the rights of minorities and women, the Washington Committee of the NAACP Legal Defense Fund selected Evelyn K. Moore to receive its highest honor. Ms. Moore currently serves on the boards of Child Trends, Inc., the National Council of Jewish Women Center for the Child, and the Child Care Action Campaign. She serves on two early childhood advisory committees of the U.S. Department of Health and Human Services: the Advisory Committee on Services for Families, Infants and Toddlers and the Advisory Committee on Head Start Quality and Expansion.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Statement of Dr. Joanne Cantor

Department of Communication Arts

University of Wisconsin-Madison

before the

Federal Communications Commission

Washington, DC

June 20, 1997

Statement of Dr. Joanne Cantor

Mr. Chairman and Commissioners of the FCC, I am pleased to appear before you to talk about the Television Industry's new ratings system for program content. As a professor at the University of Wisconsin, I have been doing research on the psychological impact of television on children for more than 20 years, and I've been investigating television ratings intensively for three years, since beginning my research for the National Television Violence Study. I have gone into more detail about my research in the comments I filed earlier. Here I will summarize the main points:

How well does the new ratings system meet the purpose of the "Parental Choice" Section of the Telecommunications Act of 1996, that is, *to permit parents to limit their children's exposure to video content they consider harmful*? The answer, in a nutshell, is: these ratings fail on at least three counts.

First, parents do not want age-based ratings. Five independent national surveys, dating from last August through this past March, have shown that parents want ratings to tell them what is in a program -- not what aged child should see it. Landslide preferences for content over age have been reported by researchers for *US News & World Report*, *The New York Times*, Roper, and Yankelovich, confirming similar findings from the national survey we conducted in collaboration with the National PTA and IMHI (Institute for Mental Health Initiatives) last fall.

Only one national poll has shown a preference for age over content, and that poll was commissioned by the Television Industry to coincide with the release of its new ratings system.

The Television Industry has made the claim that opposition to the new ratings system is an inside-the-Beltway phenomenon. However, these consistent results of national random surveys shows that parents' preference for content information is as widespread as it is reliable.

Second, these ratings do not tell parents what they need to know. Different parents feel differently about the impact of televised violence vs. sex vs. coarse language on their children. According to the new ratings system, a "TV-PG" program "may contain infrequent coarse language, limited violence, some suggestive sexual dialogue and situations." If the highly similar MPAA ratings are any indication, a rating such as "TV-PG" will give no notice of the type of content to expect in a program. In addition to analyses we have already reported on movies shown on television, we recently looked at all movies that the MPAA had rated over the past two years. Under intense public pressure, the MPAA is now revealing the reasons why movies received their ratings. Our analysis showed that more than one-fourth (26%) of "PG"-rated movies contain coarse language only; another 26% have violence and language; and another 18% have no sex, no violence, and no bad language, but only other controversial content, such as "thematic elements." These analyses lead us to expect that the content of a program rated "TV-PG" will be totally unpredictable -- parents will not have a clue whether it contains content they consider harmful.

Third, age-based ratings entice children to restricted programs. In two years of research conducted for the National Television Violence Study, we have found that

the MPAA ratings of "PG-13: Parents Strongly Cautioned," and "R: Restricted" produced a "forbidden fruit" effect, making many children more eager to see a movie. What is worse, for children aged 5 to 9, those who said they get into fights more often and those who like to watch TV the most were especially attracted by programs with more restrictive MPAA ratings. In contrast, none of the content-based systems we tested enticed children to view more violent programs. The content-based systems included the HBO/Showtime violence codes as well as the advisory "contains some violent content." Similarly, in research conducted at Iowa State University, restrictive warning labels attracted both child and adult viewers to movies, but information about violent content did not.

What this research says, in short, is that telling children they're too young to see a program, as implied by these age-based ratings, is more enticing than telling them it's violent. Although some will argue that the enticement factor will be moot when V-chips are in televisions and restricted programs will be automatically blocked out, it must be recognized that V-chips will never be in all TV's. We should therefore be concerned about these side-effects of restrictive ratings even after the V-chip is implemented.

In summary, the Industry's new TV Parental Guidelines are the opposite of what parents overwhelmingly want; they fail to disclose the critical content information that parents need; and rather than discouraging children's viewing, they lure children to the programs we are trying to shield them from. On the other hand, content-based ratings are overwhelmingly preferred by parents; they specify different types of content so parents

can make informed decisions; and they are less likely to produce the "forbidden-fruit" syndrome.

Finally, I would like to emphasize the need for continuing, independent research to determine whether any new ratings system is serving the needs of parents. If the past six months have taught us anything, it is that the interests of producers, who are in the business of making money through programming, are at odds with the interests of parents, who are trying to protect their children from harmful content. Both the vagueness of the ratings system and the industry's tendency to give programs lenient ratings are designed to minimize the expected adverse economic effects of rating programs clearly and truthfully.

For the past three years, I have been privileged to conduct research on television ratings with support both from the industry (the National Cable Television Association) and other sources, and I have been permitted to conduct this research without pressure to modify my findings to please one constituency or another. But as we have seen, research supported and controlled by the object of investigation sometimes produces results that are at odds with the findings of independent researchers. For this reason I urge that any future evaluation of the new rating system be done in an independent, objective, and open fashion, which looks at how accurately the ratings are applied to programs and permits a fair comparison between the industry's system and other feasible approaches.

COMMUNICATION ARTS

UNIVERSITY OF WISCONSIN-MADISON

April 7, 1997

Office of the Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, DC 20554

CS Docket No. 97-55

Dear Commissioners:

This letter contains my comments regarding the television industry's proposal for rating video programming, referred to as the "TV Parental Guidelines." As a professor at the University of Wisconsin, I have been doing research on the psychological impact of television on children for more than 20 years. More importantly here, I have been investigating television ratings intensively for three years, both for the National Television Violence Study (an independent violence monitoring project funded by the National Cable Television Association) and in collaboration with the National PTA.

In this letter, I will use research findings to address the following question: How well does the new rating system meet the purpose of the "Parental Choice" Section of the Telecommunications Act of 1996, that is, *to permit parents to limit their children's exposure to video content that they consider harmful?* The answer, in a nutshell, is very poorly indeed. There are three main reasons for this evaluation:

1. **The TV Parental Guidelines are the opposite of what parents want.** Five independent national surveys¹ have shown that parents do not want age-based ratings that fail to specify the content of individual shows. In "landslide" proportions, parents prefer a rating system that provides information on the level of violent and sexual content in a program, similar to a system currently used on HBO and Showtime, over one that provides a recommendation as to the age of the child who should see it, as exemplified in the decades-old Motion Picture (MPAA) Ratings and the new TV system. The following table summarizes these results:

SOURCE	DATE OF POLLING	% for content	% for age-based
<i>US News</i>	8/12 - 8/14/96	62	27
PTA	9/5 - 9/23/96	80	20
Roper	12/2 - 12/10/96	73	15
<i>NY Times</i>	2/18 - 2/19/97	69	26
Yankelovich	2/21 - 3/1/97	70	18

Vilas Hall 821 University Avenue Madison, Wisconsin 53706-1497

The only polls that purport to show parental approval for the new system either do not compare the two approaches,² or they unfairly characterize the competing, content-based system.³

2. The TV Parental Guidelines fail to convey critical content information.

The new ratings do not provide the information about program content that parents need in order to limit their children's access to programs *they* consider harmful. Surveys indicate that different parents feel differently about the impact of televised violence vs. sex vs. coarse language on their children.⁴ If the highly similar MPAA ratings are any indication [more below on how similar they are], a rating such as "TV-PG" will not give parents advance notice of the type of content to expect in a program. We have analyzed the data from the National Television Violence Study, which includes the largest and most representative sample of television programming ever collected, to explore the proportion of movies rated "PG" that contained different types of content, according to the content codes affixed by the channel showing them.⁵ In the analysis for Year 1, 22% of the "PG"-rated movies had neither sex nor violence, but only adult language. Another 22% had language and sex, and 28% had language and violence. A similar diversity of content was found in the Year 2 NTVS report, just released,⁶ and in a new analysis of the content of all MPAA-rated movies released over the past two years.⁷ These findings suggest that the content of a program rated "TV-PG" will be totally unpredictable -- parents will not know whether it contains content they consider harmful and they thus will not have the advance information needed to decide whether they should shield their child from it or not.

3. The TV Parental Guidelines are expected to increase, rather than reduce children's exposure harmful programming. In research we conducted for Year 1 of the National Television Violence Study⁸, the MPAA ratings of "PG-13: Parents Strongly Cautioned," and "R: Restricted" made many children more eager to see a movie and the "G: General Audiences" rating made many of them avoid it.

The Year 2 NTVS research, which we just released, produced further bad news for the MPAA ratings.⁹ The MPAA ratings again attracted children to restricted programs. Moreover, they were the most potent of the eight rating systems tested in terms of their ability to attract children to restricted content. Furthermore, they were the only system to especially attract more aggressive children and the more avid TV viewers to restricted content. In contrast, not one of the three content-based systems for labeling violence that we tested, including the popular system used by HBO and Showtime, attracted children to higher violence levels.

The only other rating system that attracted children to restricted programs was the warning "parental discretion advised," which attracted boys to programs in both years of our study. Recent findings by other researchers confirm that restrictive warning labels exceed content information in their capacity to attract viewers to controversial content.¹⁰

Our conclusion from this research is that ratings that urge parental control of children's viewing based on their age are the most likely to attract children to programs by what we call the "forbidden fruit" syndrome. Labels that simply designate programs as to their level of violence do not have the same power to entice child viewers. This is not to say that children will never be attracted to a program by a violence label -- but only that the enticement power of restrictive ratings is apparently much more universal and much stronger than that of a descriptive label.

Three conclusions seem warranted from research that has been conducted thus far:

1. **Because of their strong similarity to rating systems that have already been tested, it is not premature to judge the TV Parental Guidelines unacceptable.** Many people (especially those in the TV industry) have made the argument that it is too soon to judge the TV rating system because it is so new and has not been tested. First, it should be noted that most of the research findings I have cited here were public knowledge during the time the Ratings Implementation Group was developing the new rating system. I personally appeared before the Ratings Implementation Group twice and presented findings about parental preferences for content over age-based ratings and research showing the "forbidden-fruit" effect of MPAA ratings. Needless to say, I strongly recommended against the adoption of a rating system patterned after the MPAA ratings -- as did every other researcher present at these meetings. Obviously, our recommendations fell on deaf ears.

Second, the new TV ratings are nearly identical, conceptually, to the well-tested MPAA ratings in two crucial ways: (1) they both indicate the appropriate age for viewing a program without specifying the program's content, and (2) they both urge parental guidance of children's viewing. These are the two characteristics that we found to be the most likely to make restricted programs more attractive.

Third, the two rating systems are nearly identical in wording. Although the MPAA ratings do not have levels for specifically child-oriented movies, the four main levels of the two systems are so similar that one wonders about the reasons for the trivial changes beyond the addition of the letters "TV":¹¹

MPAA RATINGS

G: General Audiences
 PG: Parental Guidance Suggested
 PG-13: Parents Strongly Cautioned
 R: Restricted

TV PARENTAL GUIDELINES

TV-G: General Audience
 TV-PG: Parental Guidance Suggested
 TV-14: Parents Strongly Cautioned
 TV-M: Mature Audience Only

2. Content-based ratings are superior to the Industry's TV Parental Guidelines in terms of their ability to serve the needs of parents. Content-based systems are overwhelmingly preferred by parents; they specify different types of content so parents can make informed decisions; and they are less likely to produce the "forbidden-fruit" syndrome.

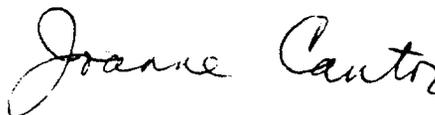
3. Any future evaluation of the new rating system needs to be done in a scientific, objective, and open fashion, which permits a fair comparison between the industry's system and other feasible approaches. Research from a variety of sources, not just industry sources, should be used to evaluate the new system and compare it to other systems.

I enclose the following research reports, referred to in my remarks, so that you can review the findings more closely:

National PTA Survey of Parents
 Reasons Why Movies Received a PG Rating: 1995-1996
 National Television Violence Study, Year 2, Executive Summary
 Ratings and Advisories: National Television Violence Study, Volume 2
 Ratings and Advisories: National Television Violence Study, Volume 1
 Ratings and Advisories: Implications for the New Rating System for Television

I would welcome the opportunity to discuss these research findings and their implications in any forum that the Commission or individual Commissioners deem appropriate. These issues would certainly benefit from being aired publicly.

Sincerely,



Joanne Cantor
 Professor

Footnotes

1. (1) Silver, M., & Geier, T. (1966, September 9). Ready for prime time? *U.S. News & World Report*, pp. 54-61; (2) Cantor, J., Stutman, S., & Duran, V. (1996, November 21). *What parents want in a television rating system: Results of a national survey*. Report released by the National PTA, the Institute for Mental Health Initiatives, and the University of Wisconsin-Madison (attached); (3) Media Studies Center/Roper (1996, December 12). *Poll finds public support for content over age-based TV rating system*. Arlington, VA: The Freedom Forum; (4) Mifflin, L. (1997, February 22). New ratings codes for television get mixed reviews from parents. *New York Times*, p. 1, 6. (5) Bash, A. (1997, March 18). Parents crave a clearer TV ratings code. (Yankelovich poll). *USA Today*, p. 3D.

2. Bash, A. (1997, February 28). TV ratings may get some fine tuning. *USA Today*, p. 1D.

3. Hart, P. (1996, December 19). Release of survey findings. In the survey conducted from December 16-18, 1996, 800 parents were asked whether they preferred the TV Parental Guidelines system or a "V-L-S" system. The forced choice question was worded as follows:

Now if you had to select only one of these two proposals, would you select (ROTATE).. the one that provided ratings of Y or Y-7 for children's programming and then G, PG, TV-14 and M for all TV shows ... or ... The one that provided ratings of V, L, or S ...

The problem with this choice is that the content-based system is described in a way that no group advocates: with only one level of sex, violence, or language and no distinction between minor vs. more intense levels. In fact, this description is similar to the content-based system ridiculed by Jack Valenti on the day of the survey's release. He argued that a content-based system would be forced to give both "Dr. Quinn Medicine Woman" and "Fatal Attraction" an "S" for sexual content. The HBO system has three levels for violence and 2 levels for language, etc. No legitimate content-based proposal is like the one described in the survey. *And still, with this inadequate and unfair description, 41% of parents preferred the content-based system to the TV Parental Guidelines.*

4. For example, Cantor, J., Stutman, S., & Duran, V. (1996, November 21). *What parents want in a television rating system: Results of a national survey*. Report released by the National PTA, the Institute for Mental Health Initiatives, and the University of Wisconsin-Madison (attached).

5. Cantor, J., Harrison, K., & Kremer, M. (in press). Ratings and advisories: Implications for the new rating system for television. In J. T. Hamilton (Ed.), *Television violence and public policy*. University of Michigan Press (attached).

6. J. Federman, Ed. (1997). *National Television Violence Study, Volume 2: Executive Summary*. Center for Communication and Social Policy, University of California, Santa Barbara (attached); Cantor, J., Harrison, K., & Nathanson, A. (1997). Ratings and advisories for television

programming. In Center for Communication & Social Policy (Ed.), *National Television Violence Study*, Volume 2 (pp. 267-322). Thousand Oaks, CA: Sage (attached).

7. Cantor, J., Nathanson, A., & Henzl, L. (1997). Reasons why movies received a PG Rating: 1995-96. University of Wisconsin (attached). We conducted a content analysis of MPAA-rated movies using the MPAA's own content specifications. Since 1995, the MPAA has been providing information on the reasons a movie received a PG, PG-13, R, or NC-17 rating. Our analysis showed that of the movies rated PG in 1995 and 1996, more than one-fourth (26%) justified the PG rating in terms of language only, and another 13% had no sex, violence or language, but only "thematic elements."

8. Cantor, J., & Harrison, K. (1996). Ratings and advisories for television programming. In *National Television Violence Study*. Volume 1 (pp. 361-410). Thousand Oaks, CA: Sage (attached).

9. Cantor, J., Harrison, K., & Nathanson, A. (1997). Ratings and advisories for television programming. In Center for Communication and Social Policy (Ed.), *National Television Violence Study*. Volume 2 (pp. 267-322). Thousand Oaks, CA: Sage (attached).

10. Research conducted by Brad Bushman at Iowa State University and completed independently of us at Wisconsin showed that restrictive warning labels attract viewers but that information about violent content does not. See Bushman, B. J. & Stack, A. D. (1996). Forbidden fruit versus tainted fruit: Effects of warning labels on attraction to television violence. *Journal of Experimental Psychology: Applied*, 2, 207-226; Bushman, B. J. (1997). Effects of warning and information labels on attraction to television violence in viewers of different ages. Manuscript under review.

11. I have not heard the television industry give a rationale for these minor changes. I have also not heard any justification for providing different ratings for programs that are designed specifically for children. I have heard no parent or child advocacy group lobby for this unnecessary complication. Some cynics have argued that one reason for these minor changes was to justify the claim that the new system has yet to be tested.

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Reasons Why Movies Received a PG Rating: 1995-1996

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Summary. Two-thirds of the movies rated by the MPAA over the past two years were rated "R," while 16% were rated "PG-13," 14% were rated "PG," and only 3% were rated "G." Of the movies that were rated "PG," more than one-fourth got that rating for language only and another 13% had "thematic elements" only.

Recently, we reported that for movies shown on television, the Motion Picture (MPAA) rating of PG was uninformative about the content to be expected.¹ An analysis of movies in a random sample of television programming that were aired with both MPAA ratings and premium channel content codes showed that the PG rating signals a wide disparity of content combinations. For example, 15% of PG-rated movies had only adult language, 18% had only violence, 22% had sex and language, and 22% had violence and language. The question obviously arises whether this finding is peculiar to movies shown on premium cable channels or whether the PG rating is equally uninformative for movies in general.

To determine the proportion of PG-rated movies that contained various types of content, we analyzed *all* the movies rated by the Classification and Rating Administration of the Motion Picture Association of America during the years 1995 and 1996 using

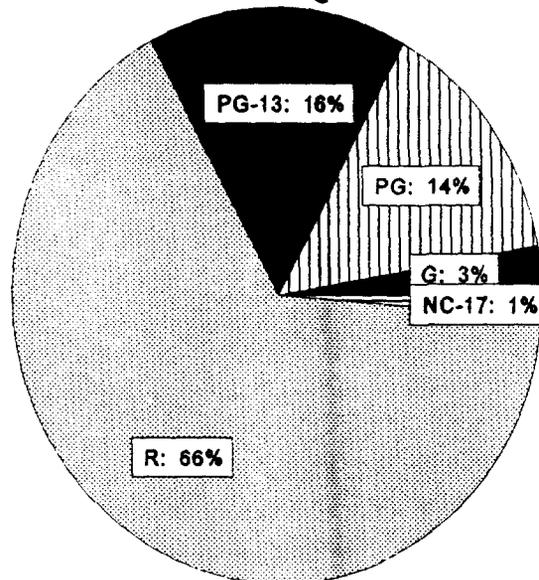
¹Cantor, J., Harrison, K., & Nathanson, A. (1997). Ratings and advisories for television programming. In Center for Communication & Social Policy (Ed.), *National Television Violence Study*, Volume 2 (pp. 267-322). Thousand Oaks, CA: Sage.

information provided in the Motion Picture Rating Directory.² Starting in January of 1995, the listings have indicated the reasons why movies received their ratings, for all ratings beyond "G."

Our analysis showed that over this two-year period, 1,410 feature-length movies received ratings from the MPAA. Figure 1 displays the proportion of movies that received each of the five possible MPAA ratings. As can be seen from the Figure, two-thirds of the movies were rated "R," while only 3% were rated "G."

Figure 1

Distribution of MPAA Ratings in 1995-96 Movies



²Motion Picture Rating Directory. Encino, CA: Classification and Rating Administration, 1997.

The reasons stated for each movie's rating were categorized by one coder, and a second coder independently categorized the reasons for 20% of the movies, selected randomly. The categories were as follows (with reliabilities calculated as Cohen's kappa): violence, including action (kappa=.98), sexual behavior or situations (.99), language (1.00), or none of the above. The "none" category was subdivided into "thematic elements" (1.00), drugs (1.00), crude or sexual humor (.94), and "other."

Figure 2 shows how the various content combinations were distributed throughout the movies that were rated PG over the two-year period. As the figure shows, more than one-fourth of these movies were classified PG as a function of language only, and another 13% had only "thematic elements."

Figure 2

Distribution of Content in PG-Rated Movies

