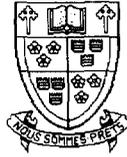


SIMON FRASER UNIVERSITY



October 1, 1997

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OCT - 2 1997
FCC MAIL ROOM

Office of the Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RE: CS Docket No. 97-55, Industry Proposal for Rating Video Programming

Dear Mr. Secretary:

With this letter, I respectfully submit my official comments regarding CS Docket No. 97-55. I have included one original along with nine copies to be distributed for the personal use of each Commissioner.

Sincerely,

Tim Collings

No. of Copies rec'd 0+9
List ABCDE



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Office of the Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RE: CS Docket No. 97-55, Industry Proposal for Rating Video Programming

Dear Mr. Secretary:

I am pleased to submit comments on the National Association of Broadcasters (NAB), the National Cable Television Association (NCTA) and the Motion Picture Association of America's (MPAA) proposal for a voluntary ratings system (the industry proposal) for video programming.

Since 1989, I have been involved in the technical development of the technology now known as the V-Chip. I have also been party to discussions in several countries, including the US and Canada, about optimal methods of implementing this technology. I am a strong advocate of the idea that parents must be equipped with the necessary information to make informed decisions for the viewing habits of their children. It is my view that the most recent industry proposal meets the minimum requirements of an acceptable ratings system and I congratulate the industry group for the consultative approach they have taken in coming to the aforementioned proposal. In this letter, I would like to provide comment on two additional points to consider before final implementation of the V-Chip in the US.

First, although the industry proposal is an excellent first step forward in terms of providing additional information to parents, there needs to be a further clarification of the terms of reference used. Specifically, in the absence of a numerical scale, terms such as "intense violence" and "intensely suggestive dialogue" will have different meanings to different broadcasters and viewers. In order for parents to make sense of the terminology, it is important that all of the terms used in the industry proposal be consistent and clearly defined. Sharpening the resolution of the terms used will assist parents in making clear choices, and will shorten the "trial and error" period that broadcasters and viewers will experience in their early attempts at using the industry ratings system.

Second, the FCC needs to consider the leadership role it is taking, internationally, when implementing the first V-Chip system. Decisions made today by the FCC regarding the encoding standard that accompanies the industry proposal will have significant ramifications for other countries, like Canada, which are in various stages of V-Chip implementation.

October 1, 1997

The encoding standard acts as a blueprint for television manufacturers to design their hardware so that it is compliant to the industry rating system. If the endorsed encoding standard is a fixed one - i.e. where the television hardware is "hard-coded" to receive only the proposed industry ratings system - then televisions manufactured under this standard will be deaf to the rating systems of other jurisdictions and to future changes to the industry proposal. An alternative would be to endorse a ratings standard that is open in nature and allows for updates to existing rating systems and the addition of new ones, such as those proposed by other countries.

Specifically, the encoding standard used to implement the industry proposal in the US will have serious enabling (or disabling) effects on the ability of other countries to implement their own ratings system. The encoding standard must be flexible in its ability to accommodate different classification systems that are applied to programs in other broadcasting systems and geographical regions. The encoding standard should also be capable of evolving to accommodate changes to these classifications systems, should modifications be required. I have devoted considerable effort recently, toward looking at means by which any acceptable classification system can be implemented in such a way that multiple classification systems can be accommodated. From a technical perspective, it is straightforward to implement this flexibility in the encoding standard. I recommend that the FCC consider this when deciding upon implementation of an approved classification system. This will allow modifications to the proposed system down the road, as well as accommodate differing classification systems in other broadcasting systems and geographical regions.

As I see it, the actions of the FCC on this matter, in taking a leadership position, will affect the actions of all other countries currently considering V-Chip solutions. Endorsing a flexible implementation will ensure that the positive first step taken by the industry group can be built upon by like-minded organizations in other countries.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Collings". The signature is fluid and cursive, with the first name "Tim" written in a larger, more prominent script than the last name "Collings".

Tim Collings