

Before the  
Federal Communications Commission  
Washington, DC 20554

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In the Matter of )  
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Revised Industry Proposal for Rating )  
Video Programming )  
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\_\_\_\_\_ )

CS Docket No. 97-55

Comments of  
**CHILDREN NOW**  
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October 3, 1997

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## **I. The Revised Television Ratings System**

The revised television ratings submitted by the broadcast industry for approval by the Federal Communications Commission are the result of negotiations that took place between the industry and a coalition of organizations that included members of the medical, educational, and children's advocacy communities. As one of the groups that participated actively in the negotiations, Children Now believes that the new ratings system, especially when working in conjunction with the v-chip, will allow parents to exercise greater control over their children's television viewing.

In April 1996, Children Now commissioned a survey of eighteen of the nation's leading experts on the relationship between the media and children. The survey asked them how a ratings system should be designed to maximize its benefits to families. Overwhelmingly, the experts agreed that an optimal ratings system would tell parents the type of content a program contains. By adding content indicators for violence (V), dialogue (D), sex (S), and adult language (L) to the industry's original age-based system, the new ratings give parents the information they need to make knowledgeable viewing choices for their children. With the revised ratings, parents will be empowered with the ability to block programs they find inappropriate for their children once the v-chip is available in the marketplace.

Children Now is pleased that the industry agreed to add an additional rating for violence in programming specifically designed for children. Although a clear link has been established between media violence and aggressive behavior, the industry has often failed to appreciate the impact of animated and live-action "combat" violence on young children. While children's experts legitimately question whether the word "fantasy" is accurate or appropriate, most agree that this information will further help parents.

At this point, only two networks have refused to implement the revised ratings: NBC and Black Entertainment Television (BET). NBC continues

to use the industry's original system, while BET refuses to use any ratings at all. NBC is the number one network in terms of viewers, broadcasting some of the most popular programs among young children. By refusing to identify the type of content that has earned a program a particular rating, NBC is denying parents the information they have been asking for. Children Now is hopeful that both NBC and BET will decide to listen to parents who have repeatedly expressed their desire to have information about program content to help them make viewing decisions for their children.

## **II. Evaluation**

The Telecommunications Act of 1996 signaled the beginning of a new era in the relationship between American families and television. By requiring that all television sets manufactured in the United States contain a v-chip, Congress and the President sought to provide parents with a tool to help them regulate television for their children. In the face of criticism from parents and the advocacy community, the industry stepped up to the plate and, with the advice of the children's experts, developed this revised ratings system. We commend the industry -- particularly Jack Valenti, Eddie Fritts, and Decker Anstrom -- for their efforts. Now it's up to the parents -- the ultimate judges of the effectiveness of the revised ratings.

As part of the agreement on the revised system, the industry committed to an independent evaluation of the ratings system once the v-chip has been in the marketplace. Children Now believes that a comprehensive evaluation of parents is essential. To do this, parents must be asked not only if they understand the system or if it is an improvement over having no ratings system at all, but whether it gives them the information they need in the manner that they need it. In addition, in order for parents to understand the new system, the ratings need to be applied consistently and accurately across programs and networks. We believe that the evaluation should consider this as well. We believe that any descriptive language developed to clarify the ratings will give both parents and the industry more information.

We hope that the industry will be responsive to the feedback parents provide during the evaluation process and consider any revisions to the system that the research might suggest.

### **III. Conclusion**

Children Now believes that the FCC should find the revised television ratings system acceptable.