

COMMUNICATION ARTS

UNIVERSITY OF WISCONSIN-MADISON

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October 3, 1997

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

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CS Docket No. 97-55

Dear Commissioners:

I am writing to file formal comments on the Revised Industry Proposal for Rating Video Programs. These comments supplement the comments that I submitted on April 7, 1997, and that are already in the record. As a professor who has conducted research on the effects of television on children for more than 20 years, and as someone who has devoted the past three years to studying media ratings, I am intimately familiar with the issues involved in creating a TV rating system that will achieve the goal of *helping parents limit their children's exposure to video content they consider harmful*.

By adding letters to indicate why a program received its rating, the revised rating system moves in a positive direction in terms of providing parents needed information. As I stated in my original comments, five national polls have shown that parents overwhelmingly prefer ratings that provide content information rather than those that simply suggest the appropriate age of the viewing audience. The only national poll that disputes this preference was commissioned by the television industry and was released with the announcement of the new TV Ratings System.¹

While I acknowledge that the revised system is a definite step in the right direction, **there are aspects of the system that interfere with the express purpose of TV ratings. Whether or not the revised system is deemed acceptable by the FCC, these problematic areas will need to be monitored:**

1. **The revised system is unduly complicated because it makes unnecessary distinctions and because it uses euphemisms for certain types of content.** Although parents have not requested this, the new system distinguishes between "S" for sexual content depicted visually and "D" for sexual dialog (sex that is talked about but not shown.) In addition, intense violence that occurs in children's programming is designated

¹See my comments to the FCC, dated April 16, 1997.

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not with a “V” for “Violence” but with an “FV” for “Fantasy Violence” -- whether the violence is indeed of the impossible, magical variety, or whether it is quite realistic. This designation is likely to confuse many parents. In addition, the unnecessary complication introduced by these additional letters may make many parents reject the system without giving it a try. It will be important to monitor parents’ ability to understand and use the system to determine whether the system is ultimately effective.

2. **The revised system permits the industry to conceal the presence of violent, sexual or coarse language content in some situations.** The age-based structure makes it impossible to discern information about content that exists at more than one age-level within a program. Under the current plan, for example, if a program has “strong coarse language,” it will be rated TV14-L; if it has “moderate violence,” it will be rated TVPG-V. But if it has both of these elements, the program will be designated simply as TV14-L. No mention will be made of the violent content. Research will be needed to determine how parents feel about this lack of disclosure. Theoretically, under the new system, a producer could avoid disclosing that a program had moderate violence simply by adding strong coarse language to the program. Research should also determine whether this aspect of the ratings promotes abuses of the system.

3. **Because the revised system continues to be based on age recommendations, it is likely to attract children to programs designated for more mature audiences and thereby make parents’ jobs harder.** In research we conducted for the National Television Violence Study, ratings that urged parental control of viewing based on their child’s age made many children more eager to see a program. In contrast, not one of the three content-based systems for labeling violence that we tested attracted children to higher violence levels.² Research will be needed to determine whether the revised rating system increases the difficulty parents have in controlling their children’s access to programs they consider harmful.

4. Although the revised system is less vague than the almost totally uncommunicative original system, **the new system is still quite vague, in that it fails to give concrete definitions of the video content that falls into the various categories.** For example, what parents may consider “moderate violence,” a program’s producer may consider “limited” or too mild to merit the “V” designation. And the same violence occurring in two different programs may receive different ratings. If the new system goes forward, its evaluation will need to include how fairly and consistently the content indicators are applied to programs.

²See my previous FCC Comments.

5. **Because of these deficiencies of the revised rating system, the technological standard for the V-chip should mandate it to accommodate other rating systems as well, and the architecture should remain flexible enough to accommodate future changes in the industry system.** Parents should be able to choose the criteria for screening programs that best meets their needs. Moreover, improvements in the rating system will undoubtedly be needed as television continues to change, and as we have the benefit of experience with the new system.

6. Finally, whether the FCC rules soon on the acceptability of the rating system or delays its decision to a later time, **I would like to emphasize the need for independent research to determine whether the TV rating system is serving the needs of parents.** If the past nine 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 rating system and the tendency to downplay child-unfriendly content arise from the industry's fear of losing advertising dollars if they state clearly what's in their programs.

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 having to modify or shade my findings to please one constituency or another. But as became clear from the survey research on what parents want in a rating system, research supported and controlled by the entity being investigated sometimes produces results that are at odds with the findings of independent researchers. For this reason, I urge that any evaluation of the rating system be done in an independent, objective, and open fashion. This research should explore how accurately the ratings are applied to programs and whether or not these ratings actually help parents prevent their children from being exposed to television content they consider harmful.

Sincerely,



Joanne Cantor
Professor