

FOC MAIL SECTION

Federal Communications Commission

FCC 98-35

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DISPATCH
Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Implementation of Section 551 of the)	CS Docket No. 97-55
Telecommunications Act of 1996)	
)	
Video Programming Ratings)	

REPORT AND ORDER

Adopted: March 12, 1998

Released: March 13, 1998

By the Commission: Commissioners Furchtgott-Roth and Tristani issuing separate statements.

I. INTRODUCTION

1. In the Telecommunications Act of 1996 (the "1996 Act"),¹ Congress determined that parents should be provided with timely information about the nature of upcoming video programming and with the technological tools that would allow them to easily block violent, sexual, or other programming they believe is harmful to their children.² Congress also provided that distributors of video programming should be given the opportunity to develop a voluntary system to provide parents with ratings information.³ In response to the 1996 Act, the National Association of Broadcasters ("NAB"), National Cable Television Association ("NCTA") and Motion Picture Association of America ("MPAA") (the "Industry") jointly submitted to the Commission on behalf of their members, a system of voluntary parental guidelines ("*TV Parental Guidelines*") adopted and implemented by television broadcasters and networks, cable networks and systems, and television program producers.⁴ Section 551(e) of the 1996 Act requires the Commission to determine whether video programming distributors (1) have established acceptable voluntary rules for rating video programming that contains sexual, violent or other indecent material about which parents should be informed before it is displayed to children and (2) have agreed

¹Pub. L. No. 104-104, 110 Stat. 56 (1996).

²1996 Act, Section 551, *Parental Choice In Television Programming*. Section 551 amended the Communications Act of 1934 by adding Sections 303 and 330. See 47 U.S.C. §§ 303, 330.

³See 1996 Act, § 551(e)(1)(A) and (B); 47 U.S.C. §§ 303, 330.

⁴The Industry submitted the *TV Parental Guidelines* to the Commission on January 17, 1997, and submitted revisions to those guidelines on August 1, 1997. See Letter of January 17, 1997 to the Commission from the NAB, NCTA, and MPAA ("January 17, 1997 Submission"); and Letter of August 1, 1997 to the Commission from the NAB, NCTA, and MPAA ("August 1, 1997 Submission").

voluntarily to broadcast signals that contain such ratings.⁵

2. In this *Report and Order*, we find that the Industry's *TV Parental Guidelines* establish acceptable voluntary rating rules and that the concomitant agreement to voluntarily broadcast signals containing ratings pursuant to the *TV Parental Guidelines* are in compliance with the specific requirements of Section 551(e). In a companion item being issued today we adopt technical rules that require television receivers with picture screens 33 cm (13 inches) or greater to be equipped with features to block the display of television programming with a common rating, commonly referred to as the "v-chip" technology.⁶ Although we chose to approach the v-chip and ratings proceedings separately, our deliberations in both proceedings have focused on Congress' goal of achieving an effective method by which the rating system, when used in conjunction with the v-chip technology, will provide parents with useful tools to block programming they believe harmful to their children.⁷

II. BACKGROUND

3. In Section 551 of the 1996 Act, Congress made extensive findings with respect to the influence that television has on children, and the need to provide 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.⁸ As a result of these findings, Congress called for the establishment of guidelines and recommended procedures for rating certain television programming, and the transmission of rating information for programs which are rated.⁹

4. Congress delayed the Commission's exercise of its authority to establish a rating system¹⁰

⁵See 1996 Act, § 551(e)(1)(A) and (B).

⁶See *Report and Order in Technical Requirements to Enable Blocking of Video Programming Based on Program Ratings*, ET Docket No. 97-206 (hereinafter "*V-chip Proceeding*"), adopted March 12, 1998. See also *Notice of Proposed Rulemaking* in ET Docket 97-206, 12 FCC Rcd 15573 (1997); 1996 Act, § 551(c), (d), and (e).

⁷See *Notice of Proposed Rulemaking* in ET Docket 97-206, 12 FCC Rcd 15573 (1997) at 9.

⁸See 1996 Act § 551 (a)(1)-(9) (reproduced in Appendix A herein).

⁹H.R. Report 104-458, 104th Cong. 2d Sess. at 195 ("Conference Report") (1996). 1996 Act, § 551; 47 U.S.C. §§ 303, 330.

¹⁰Congress directed the Commission to, after consulting with an independent advisory board, establish a system for the rating of video programming for use by parents to determine the appropriateness of specific programming for their children. Section 303(w) of the Communications Act, as added by Section 551(b)(1) of the 1996 Act, provides that the Commission shall prescribe:

(1) on the basis of recommendations from an advisory committee established by the Commission in accordance with section 551(b)(2) of the Telecommunications Act of 1996, guidelines and recommended procedures for the identification and rating of video programming that contains sexual, violent, or other indecent material about which parents should be informed before it is displayed to children: *Provided*, That nothing in this paragraph shall be construed to authorize any rating of video programming on the basis of its political or religious content; and

to permit the broadcast and cable industries to develop an acceptable voluntary rating system for video programming within one year of the enactment of the 1996 Act on February 8, 1996.¹¹ Specifically, under Section 551(e)(1):

The amendment made by subsection (b) of this section shall take effect 1 year after the date of enactment of this Act, but only if the Commission determines, in consultation with appropriate public interest groups and interested individuals from the private sector, that distributors of video programming have not, by such date --

(A) established voluntary rules for rating video programming that contains sexual, violent, or other indecent material about which parents should be informed before it is displayed to children, and such rules are acceptable to the Commission; and

(B) agreed voluntarily to broadcast signals that contain ratings of such programming.

5. Following enactment of the 1996 Act, and over the course of the next year, the broadcasting, cable and program production industries worked together to develop a rating system, which they implemented in early January 1997. Details of the rating system were submitted to the Commission on January 17, 1997.¹² Following the January 17, 1997 Submission, the Commission sought comment from interested parties on the *TV Parental Guidelines*.¹³ Parents groups, public health organizations, members of Congress, public interest groups and others expressed concern about some aspects of the rating system.¹⁴ Discussions between the Industry and certain advocacy groups continued and on August

(2) with respect to any video programming that has been rated, and in consultation with the television industry, rules requiring distributors of such video programming to transmit such ratings to permit parents to block the display of video programming that they have determined is inappropriate for their children. 1996 Act, § 551(b)(2), codified at Section 303(w)(2) of the Communications Act, 47 U.S.C. § 303(w)(2).

¹¹See Conference Report at 194-5.

¹²January 17, 1997 Submission.

¹³See Public Notice, *Commission Seeks Comment On Industry Proposal For Rating Video Programming*, CS Docket No. 97-55, FCC 97-34 (February 7, 1997) ("*Initial Notice*").

¹⁴See e.g., Joint Comments of Center for Media Education, American Medical Association, Center for Media Literacy, Children's Defense Fund, Children Now, Cultural Environment Movement, Institute for Public Affairs of the Union of Orthodox Jewish Congregations of America, Media Center of the Judge Bate Children's Center, National Alliance for Non-Violent Programming, National Association for Family and Community Education, National Association of Elementary School Principals, National Association of School Psychologists, National Coalition on Television Violence, National Council of La Raza, National Education Association, National Institute on Media and the Family, National Parent Teacher Association, Public Media Center, and Teachers for Resisting Unhealthy Children's Entertainment (April 8, 1997); Letter to the Federal Communications Commission, Office of the Secretary from Reps. Edward J. Markey, Dan Burton, James P. Moran, John Spratt, Ron Klink, James C. Greenwood, John Murtha, Glenn Poshard, William O. Lipinski, Bob Filner, Joe Kennedy, Bob Goodlatte, Frank Wolf, Sue Kelly, Rosa DeLauro, and Earl Pomeroy, and Sens. Joseph Lieberman, Kent Conrad, Byron Dorgan, Dan Coats, Slade Gorton, Ernest F. Hollings and Robert C. Byrd (April 8, 1997).

1, 1997, the Industry submitted to the Commission revisions to the guidelines.¹⁵ The Industry states that the *TV Parental Guidelines*, as modified, are supported by nine family and child advocacy groups,¹⁶ as well as television broadcasters, cable systems and networks, and television production companies.¹⁷ The revised *TV Parental Guidelines* were implemented on October 1, 1997.

III. THE TV PARENTAL GUIDELINES

6. According to the Industry, the *TV Parental Guidelines* are designed so that "category and program-specific content indicators will provide parents with information that will help them make informed decisions about what their children should watch on television."¹⁸ The *TV Parental Guidelines* describe a voluntary rating system consisting of six descriptive labels designed to indicate the appropriateness of television programming to children according to age and/or maturity; content indicators concerning sexual situations, violence, language or dialogue; transmission of the ratings information over line 21 of the Vertical Blanking Interval ("VBI"); display of on-screen rating icons and indicators;¹⁹ and the establishment of an Oversight Monitoring Board.²⁰

7. The Industry states that the *TV Parental Guidelines* will apply to all television programming except for news, sports, and unedited MPAA rated movies on premium cable channels.²¹ The *TV Parental Guidelines* (labels and content indicators, and respective meanings) are:²²

¹⁵See August 1, 1997 Submission. The Commission sought comment on the August 1, 1997 Submission stating that comments already filed would be incorporated and encouraged parties to file new or revised comments to the extent they were concerned with the elements of the August 1, 1997 Submission. See Public Notice, *Commission Seeks Comment On Revised Industry Proposal For Rating Video Programming*, CS Docket No. 97-55, FCC 97-321 (September 9, 1997) ("Second Notice"). Unless otherwise noted, comments cited herein are in response to the *Second Notice*.

¹⁶See August 1, 1997 Submission at 1-2, and attached Agreement on Modifications to the *TV Parental Guidelines*, July 10, 1997, ("Joint Agreement") attached as Appendix D.

¹⁷On July 10, 1997, the Public Broadcasting Service ("PBS") announced it would also join in the implementation of the revised *TV Parental Guidelines*.

¹⁸August 1, 1997 Submission at 3.

¹⁹Under the January 17, 1997 Submission, television programming rating labels are age based with separate categories for programs designed solely for children. See January 17, 1997 Submission at 1-2. Under the supplemental August 1, 1997 Submission, the *TV Parental Guidelines* add content indicators for violence, sex, language or dialogue, with additional rating information for programs designed solely for children.

²⁰See January 17, 1997 Submission at 4 -5; August 1, 1997 Submission at 3.

²¹January 17, 1997 Submission at 4; August 1, 1997 Submission at 3. Unedited movies that are typically shown on premium cable channels will carry their original MPAA ratings. Movies that were produced before the creation of the movie rating system in 1968 and movies that are edited for television will carry the *TV Parental Guidelines*.

²²August 1, 1997 Submission at 2.

For programs designed solely for children:

TV-Y (All Children -- *This program is designed to be appropriate for all children*). Whether animated or live-action, the themes and elements in this program are specifically designed for a very young audience, including children from ages 2-6. This program is not expected to frighten younger children.

TV-Y7 (Directed to Older Children -- *This program is designed for children age 7 and above*). It may be more appropriate for children who have acquired the developmental skills needed to distinguish between make-believe and reality. Themes and elements in this program may include mild fantasy or comedic violence, or may frighten children under the age of 7. Therefore, parents may wish to consider the suitability of this program for their very young children. Note: For those programs where fantasy violence may be more intense or more combative than other programs in this category, such programs will be designated **TV-Y7-FV**.

For programs designed for the entire audience, the general categories are:

TV-G (General Audience -- *Most parents would find this program suitable for all ages*). Although this rating does not signify a program designed specifically for children, most parents may let younger children watch this program unattended. It contains little or no violence, no strong language and little or no sexual dialogue or situations.

TV-PG (Parental Guidance Suggested -- *This program contains material that parents may find unsuitable for younger children*). Many parents may want to watch it with their younger children. The theme itself may call for parental guidance and/or the program contains one or more of the following: moderate violence (V), some sexual situations (S), infrequent coarse language (L), or some suggestive dialogue (D).

TV-14 (Parents Strongly Cautioned -- *This program contains some material that many parents would find unsuitable for children under 14 years of age*). Parents are strongly urged to exercise greater care in monitoring this program and are cautioned against letting children under the age of 14 watch unattended. This program contains one or more of the following: intense violence (V), intense sexual situations (S), strong coarse language (L), or intensely suggestive dialogue (D).

TV-MA (Mature Audience Only -- *This program is specifically designed to be viewed by adults and therefore may be unsuitable for children under 17*). This program contains one or more of the following: graphic violence (V), explicit sexual activity (S), or crude indecent language (L).

8. As proposed by the Industry, rating icons and associated content symbols appear for 15 seconds at the beginning of all rated programming and through the use of a display button on a remote control device thereafter.²³ Under the *TV Parental Guidelines*, the rating guidelines will typically be applied to television programs by broadcast and cable networks and producers, while television stations

²³*Id.* at 3, and *Joint Agreement*. Although we are not, in the v-chip Proceeding, mandating that TV sets display the rating icon in response to a button on the remote control, we encourage manufacturers to develop the technology that would permit this function.

retain the right to substitute the rating they deem appropriate for their audience.²⁴ The Industry notes that cable networks and television stations will provide rating information to newspapers and publishers of printed and electronic program guides, and will request that these publishers include the appropriate information in their guides.²⁵

9. According to the Industry, the *TV Parental Guidelines* will work with the v-chip technology to permit parents to block programming with a certain rating from coming into their home. The v-chip, which will be installed in television sets, or available through set-top boxes, will read information encoded in the program and block based on the overall age category or by the S, L, V, or D rating assigned to the program, or by a combination of the two.²⁶

10. The Industry has established an Oversight Monitoring Board to ensure that the rating guidelines are applied accurately and consistently to television programming.²⁷ The Board is comprised of a chairman and 23 members, including 6 members each from the broadcast television industry, the cable industry, and the program production community, and 5 non-industry members selected by the Chairman from the advocacy community, for a total of 24 members.²⁸ The Oversight Monitoring Board will provide information to producers and other program distributors concerning the *TV Parental Guidelines*, as well as address complaints and requests from the public about the *TV Parental Guidelines* and their implementation. The Oversight Monitoring Board will explore attitudes about the *TV Parental Guidelines* and the way in which they are being applied to programming, conduct focus groups and commission quantitative studies to determine whether the *TV Parental Guidelines* are providing useful information to parents, and consider any needed changes to them.²⁹ The Industry has also committed to independent, scientific research and evaluation of the rating system once the v-chip is in place.³⁰

IV. REVIEW OF THE VOLUNTARY PROPOSAL

11. Section 551(e) of the 1996 Act directs the Commission, in consultation with appropriate public interest groups and interested individuals from the private sector, to determine whether distributors of video programming have established acceptable voluntary rules for rating video programming that

²⁴January 17, 1997 Submission at 4; August 1, 1997 Submission at 3. Each program in a series will be separately rated.

²⁵January 17, 1997 Submission at 5; August 1, 1997 Submission at 3.

²⁶As noted previously, details as to the implementation of the v-chip provisions of Section 551 can be found in our companion item issued today.

²⁷January 17, 1997 Submission at 4; August 1, 1997 Submission at 3, *Joint Agreement*.

²⁸*Id.*

²⁹*Id.* The Oversight Monitoring Board held its first meeting on February 26, 1998. The Oversight Monitoring Board reported that, subsequent to the addition of the content icons, it has received 162 comments regarding the rating system, and that only three of these comments were "negative." See *Communications Daily*, Vol. 18, No. 39 (February 27, 1998).

³⁰August 1, 1997 Submission at Attachment 1.

contains sexual, violent or other indecent material about which parents should be informed before it is displayed to children, and to determine whether distributors of video programming have agreed voluntarily to broadcast signals that contain ratings of such programming.³¹ If we determine that these conditions are not present, we are to establish an advisory committee. On the basis of the advisory committee's recommendations, we would then prescribe guidelines and recommended procedures for the identification and rating of such video programming and to prescribe, in consultation with the television industry, rules requiring distributors of any rated video programming to transmit such rating to permit parents to block display of rated programming.³²

(1) Consultation With Appropriate Public Interest Groups and Interested Individuals From the Private Sector

12. To implement Section 551's requirement that we consult with the public regarding the acceptability of the *TV Parental Guidelines*, we issued public notices on February 7, 1997 (*Initial Notice*) and on September 9, 1997 (*Second Notice*) seeking comment on, respectively, the Industry's initial *TV Parental Guidelines* and the subsequently revised *TV Parental Guidelines*.³³ In this regard, we developed a full record that includes the views of parents and teachers, public interest groups, medical professionals, industry representatives and interested individuals from the private sector. In addition to the comments filed in response to our public notices, we received numerous informal comments from interested parties, including comments received through electronic mail, and have made those comments part of the record.³⁴ As a result, however, of the lengthy discussions between the industry and the public on the acceptability of the *TV Parental Guidelines* after the January 17th filing, as well as a Congressional Hearing on the matter,³⁵ we determined that an additional public forum at the Commission was unnecessary.³⁶ We believe that Congress's interest in having the Commission consult with the public on the acceptability of the *TV Parental Guidelines* was augmented, in large degree, by the negotiations that took place between

³¹Section 551(e)(1)(A) and (B). This Section also required the industry to submit its voluntary rating system within one year after the date of enactment of the 1996 Act. The Industry complied with this requirement by filing details of its rating system on January 17, 1997. To the extent that the Industry modified its guidelines to address concerns raised by the public, we do not believe that this subsequent modification affects the Industry's earlier compliance with the one year requirement.

³²Section 551(b)(1).

³³See *supra* at notes 13 and 15.

³⁴In response to the January 17, 1997 Submission, the Commission received 52 formal comments, 18 reply comments, 3,166 informal comments, and over 400 electronic mail responses from interested parties. Appendix B is a list of commenters filing in response to the Industry's January 17, 1997 Submission; Appendix C is a list of commenters filing in response to the Industry's August 1, 1997 Submission.

³⁵On February 27, 1997, the Senate Committee on Commerce, Science and Transportation, held a hearing on the *TV Parental Guidelines*.

³⁶The Commission scheduled an *en banc* hearing on the *TV Parental Guidelines* for June 20, 1997, which was postponed until July 14, and then postponed again indefinitely. See, Public Notices *Commission Announces En Banc Hearing On Industry Proposal for Rating Video Programming and On "V-chip" Technology*, CS Docket No. 97-55, DA 97-857 dated April 23, 1997, May 15, 1997 and July 10, 1997.

prominent advocacy groups and the industry. As a result, we considered the results of these negotiations, as well as the formal and informal comments filed in our proceeding, in making our determination. In addition, we have met with various parties about their concerns.³⁷

13. Our outreach efforts generated significant input on many important issues.³⁸ The January 17th filing generated a large number of commenters,³⁹ with the majority of comments reflecting concern that the rating system did not provide specific information identifying whether a program contained sexual, violent or indecent material. In response to the August 1, 1997 revisions to the *TV Parental Guidelines*, the Commission received 11 formal comments, 2 reply comments and 2 informal comments, the majority of which reflect general support for the revised *TV Parental Guidelines*. In addition, on August 6, 1997, the Commission received a letter from Representatives Burton, Markey, Moran and Spratt stating that the revised ratings proposal has the broad support of advocacy groups and the broadcasting industry.⁴⁰

14. Nine prominent advocacy groups have explicitly endorsed the *TV Parental Guidelines* submitted by the Industry on August 1, 1997.⁴¹ The groups are the American Medical Association; American Academy of Pediatrics; American Psychological Association; Center for Media Education; Children's Defense Fund; Children Now; National Association of Elementary School Principals; National Education Association; and the National PTA (the "Concurring Advocacy Groups").⁴² In a statement of acceptance, the Concurring Advocacy Groups state that:

[T]he *TV Parental Guidelines* have been developed collaboratively by members of the industry and the advocacy community. We find this combined age and content based system to be acceptable and believe that it should be designated as the mandated system on the V-chip and used to rate all television programming, except for news and sports, which are exempt, and unedited movies with an MPAA rating aired on premium cable channels. We urge the FCC to so rule as expeditiously as possible.⁴³

15. Most commenters urge the Commission to find that the *TV Parental Guidelines*, as revised, are acceptable. Commenters representing the interests of children, parents and teachers, medical disciplines, program distributors, film producers and equipment manufactures, as well as several individual

³⁷Commission staff met with representatives of NCTA, OKTV and NAB, among others.

³⁸Some commenters raised issues outside the scope of this proceeding, and thus are not addressed herein. See e.g., comments of Thomas Jefferson Center for the Protection of Free Expression; American Civil Liberties Union.

³⁹See fn. 34, *supra*.

⁴⁰Letter from Representatives Burton, Markey, Moran and Spratt to Commission, August 6, 1997.

⁴¹*Joint Agreement*.

⁴²*Id.*

⁴³*Id.*

commenters support the acceptability of the *TV Parental Guidelines*.⁴⁴ Many commenters find that the *TV Parental Guidelines* will enable distributors to adequately identify sexual, violent, or other indecent material about which parents should be informed prior to its display to children and to provide parents with timely access to this information. Several commenters, for example, cite specifically the addition of content descriptors for sex, violence, language and dialogue to the *TV Parental Guidelines*' six age/maturity-based categories as meeting the goal of providing parents with the information they need to make viewing choices for their children.⁴⁵ Others cite the addition of the non-industry representatives to the Oversight Monitoring Board in urging acceptance of the *TV Parental Guidelines*.⁴⁶

16. A few commenters raise concerns about the overall fairness of the Oversight Monitoring Board⁴⁷ and consistency in the application of ratings.⁴⁸ Some argue for a stronger oversight mechanism, including enforcement and review procedures, that will achieve and maintain consistency of application of the *TV Parental Guidelines*.⁴⁹ Other commenters encourage the Commission to permit the use of alternative rating systems.⁵⁰

17. Two commenters, Morality in Media and Robert Kimball, argue that the *TV Parental Guidelines* are unacceptable even after revisions were made to the system, including the addition of S, L, V, and D descriptors.⁵¹ These commenters generally contend that the *TV Parental Guidelines* fail to inform parents of sexual and other indecent material in television programs. Morality in Media believes the *TV Parental Guidelines* do not give sufficient information to parents because the rating categories do

⁴⁴Many of these groups supported the January 17, 1997 Submission (numerous television stations, middle and high school students, universities and university students, Writers Guild of America, East). Others filed in support of the August 1, 1997 Submission (AACAP & APA; CEMA; Block; Cantor; Collings. Also, AAP, Children Now, and National PTA submitted separate statements in addition to the *Joint Agreement*).

⁴⁵See e.g. AAP at 1; Children Now at 1-2; National PTA, attachment; Cantor at 1. Consensus was also facilitated by the elimination of the word "may" from the *TV Parental Guidelines*' description of age and maturity based categories. AAP at 1.

⁴⁶AAP at 2.

⁴⁷See e.g. AACAP & APA at 2; Morality in Media at 8, 15; also VideoFreedom, Inc. at 1-2 (April 8, 1997).

⁴⁸See e.g. Cantor at 2; AACAP & APA at 2; Morality in Media at 10; National Coalition on Television Violence at 3-4 (April 8, 1997). Concern was also raised about the non-application of ratings to news, sports, program promotions and advertisements. See Morality in Media at 8-9 (April 8, 1997); Para Technologies, Inc. at 18-19 (April 8, 1997).

⁴⁹AACAP & APA at 2; Morality in Media at 8-9.

⁵⁰Several parties indicate they are developing alternative rating system that they would like to make available for general use. While no party has sought to have the Commission determine whether its alternative rating system is acceptable, some parties do advocate that parents should have access to such alternative rating systems. See e.g. OKTV at 5-26, (April 8, 1997); Block at 2-3; Cantor at 3; NBC at 3-4; VideoFreedom, Inc. at 4-5 (April 8, 1997).

⁵¹Morality in Media at 1; Kimball at 2.

not contain objective and definite criteria for determining a program's rating.⁵² *Morality in Media* also criticizes the Industry's proposed rating system because it is based on the age-based MPAA rating system, a system it claims provides the industry's own assessment as to the appropriateness of films and is designed to keep from alerting parents as to the inappropriateness of many Hollywood films.⁵³ Kimball requests that the Commission not find the *TV Parental Guidelines* acceptable because they are inadequate and would fail to inform parents of sexual and other indecent material in television programs they may not want their children to watch.⁵⁴ *Morality in Media* also argues that NBC's failure to rate programs in accordance with the *TV Parental Guidelines* means that the "Industry" has not voluntarily agreed to transmit the ratings as required by Section 551(e)(1)(B).⁵⁵

(2) ***Establishment and Acceptability Of Voluntary Rules For Rating Video Programming***

18. After reviewing the *TV Parental Guidelines* and considering the comments filed and the viewpoints expressed throughout this proceeding, we find that, in accordance with Section 551(e)(1)(A) of the 1996 Act, distributors of video programming have established acceptable voluntary rules for rating video programming that contains sexual, violent, or other indecent material about which parents should be informed before it is displayed to children.

19. Section 551 requires that the Commission determine whether the *TV Parental Guidelines* are acceptable. As a preliminary matter, we must determine what it means for the rating system to be "acceptable." The term is not defined in the statute, nor are we aware of any statutory interpretation of the term that would be relevant to our determination here. Applying the general meaning of the term,⁵⁶ we believe that it is reasonable to interpret the statute to mean that the rating system is acceptable if it meets both the specific requirements of Section 551(e) and the overall goals of Congress in enacting Section 551.⁵⁷

20. Section 551(e)(1)(A) states that the rating system must provide information about programming that contains sexual, violent or other indecent material about which parents should be informed before it is displayed to children. The *TV Parental Guidelines* provide a comprehensive system for rating programming that contains violent, sexual, or other indecent material, with specific rating

⁵²*Morality in Media* at 3-9.

⁵³*Id.*

⁵⁴Kimball at 1.

⁵⁵*Morality in Media* at 15.

⁵⁶Webster's Dictionary defines acceptable as "worth accepting; satisfactory or, sometimes, merely adequate." Webster's New World Dictionary of the American Language, Second College Edition, Simon and Schuster.

⁵⁷See also *Morality in Media* at 2, stating that "[a]s used by Congress, . . . the word 'acceptable' was followed by the phrase 'to the Commission.' This clearly indicates Congress' desire to rely heavily on the expertise of the FCC to 'accept' a rating system which the Commission is satisfied would accomplish the objectives of Congress."

information for programs designed solely for children.⁵⁸ Programming designated solely for children is age-based to indicate programming appropriate for all children (including ages two to six), programming for older children (ages seven and above) with a more specific content indicator for fantasy violence.⁵⁹ Programming for the entire audience is also age-based and supplemented by content indicators for sex, violence, adult language and suggestive dialogue. *Morality in Media* argues that the categories are subjective. We agree with the majority of commenters, however, who believe that the age-based, content supplemented system adopted by the Industry is sufficiently objective to provide parents with information necessary to make informed decisions. We do not agree with commenters who argue that we cannot find the system "acceptable" absent the inclusion of more specific details about varying degrees of violent, sexual, or other indecent materials found in the programming.⁶⁰ The *TV Parental Guidelines* provide for weighing of each of the descriptors depending on which of the age-based categories it is associated with, *i.e.*, the "V" in TV-PG-V means "moderate violence" while the "V" in TV-14-V means "intense violence." As a result, we do not believe that additional descriptors are necessary to meet the goals of Congress in adopting Section 551. Congress required that the rating system be sufficient to advise parents of the appearance of sexual, violent or indecent material in certain programming. We find that the *TV Parental Guidelines* meet this goal.

21. Some commenters raise concerns that the *TV Parental Guidelines* do not rate sports, news, commercials or promotions.⁶¹ Parties argue that these programs contain sexual or violent material that may be harmful to children.⁶² As an initial matter, we note that the EIA standard that we are adopting in the *V-chip Proceeding* accommodates the rating of programs, including commercials within the program. Since advertisers target specific audiences reached by particular programming, it is not unreasonable for the Industry to rely on the program blocking mechanism to also filter commercials that appear in the program. While it appears that commercials that are not encoded may be passed through, such as locally inserted advertisements, we do not think that failure to rate advertisements individually will defeat the purpose of Congress in enacting Section 551. We also think it is important to recognize that the decision to exclude these categories of programming was made with the support of the advocacy groups that negotiated revisions to the Industry proposal. Similarly, we think it is not unreasonable for the Industry to exempt sports and news programming. In addition to the practical limitations in rating such programming, we note that Congress recognized the danger in requiring rating of political programming, which is often an integral element in news programming.⁶³ As a result, we conclude that

⁵⁸See August 1, 1997 Submission at 1-2.

⁵⁹*Joint Agreement*, Attachment 1.

⁶⁰Some parties argue, for example, that each "V" rating should be accompanied by a level rating of 1 through 5, for degree of violence. See *e.g.* Michigan Decency Action Council at 3 (April 8, 1997); Mediascope at 3, 5-7 (April 8, 1997); Langley at 1-2 (April 8, 1997); OKTV at 17-19 (April 8, 1997); *also*, *Morality in Media* at 10-12; Kimball at 2.

⁶¹In addition, unedited movies with an MPAA rating aired on premium cable channels are exempt.

⁶²*Morality in Media* at 8-9 (April, 8 1997); Para Technologies, Inc. at 18-19 (April 8, 1997).

⁶³See Section 551(b)(1) ("... nothing in this paragraph shall be construed to authorize any rating of video programming on the basis of its political or religious content . . .").

the *TV Parental Guidelines* are acceptable even though the Industry has decided not to rate these programs as a general rule.

22. We agree with commenters who express concern that to be useful, the rating system must be applied in a consistent and accurate manner.⁶⁴ The record here indicates that the Industry has taken steps to insure that this is the case. The agreement reached between the Industry and the advocacy groups commits the Industry to independent, scientific research and evaluation of the rating system once the v-chip is in place.⁶⁵ We believe that this independent research and evaluation is important to determine whether the rating system is working and providing parents with the information needed to make viewing choices for their children. We view this research and evaluation effort as an important opportunity for parents to assess the usefulness of the rating system and provide input on the consistency and accuracy of the ratings. We expect that the research and evaluation of the rating system, once the system has been in use, will allow for adjustments and improvements to the system. We view this commitment as an important element in the proposal.

23. We also believe that the Oversight Monitoring Board can play an important role in making the ratings meaningful by helping to ensure a consistency of approach in rating the programs. We note that in response to concerns raised by the public interest groups, the Industry agreed to add 5 non-industry members, drawn from the advocacy community, to the board.⁶⁶ While some commenters raise concerns that the board, with 19 industry members, is still unbalanced,⁶⁷ we agree with the majority of commenters that the addition of representatives from the advocacy community will provide an important voice for non-industry interests and will permit useful oversight of the rating system.

24. We believe that, based on the record before us, the *TV Parental Guidelines* serve the goals of Section 551. The voluntary rating system addresses Congress' concern that parents have timely information about the nature of upcoming video programming.⁶⁸ The Industry has voluntarily agreed to transmit ratings over line 21 of the VBI. Under the *TV Parental Guidelines*, rating icons and descriptors will be displayed for 15 seconds at the beginning of a program and may be displayed at any time through the use of a remote control display button.⁶⁹ Also, the size of the icon has been increased from the initial proposal so that it will occupy more than 40 scan lines on the television screen.⁷⁰ The *TV Parental Guidelines*, used in conjunction with the v-chip technology, will give parents the tools they need to limit the exposure of their children to video programming that they believe is inappropriate.

⁶⁴AACAP & APA at 2; Cantor at 2; Collings at 1

⁶⁵*Joint Agreement*, Attachment 2.

⁶⁶August 1, 1997 Submission at 3.

⁶⁷AACAP and APA at 3; *Morality in Media* at 15.

⁶⁸1996 Act, § 551 (a) (9).

⁶⁹*Joint Agreement*.

⁷⁰*Id.*

25. In the *Second Notice* we asked for comment on whether the Commission should determine the acceptability of any alternative ratings systems used by video programming distributors. Some commenters asked the Commission to guarantee access to alternative ratings systems, and we are aware of at least one programmer, NBC, that has implemented its own variation of the Industry rating system.⁷¹ We believe, however, that Congress intended that we evaluate only the system of rules established through industry consensus. Section 551 was designed to give the industry an opportunity to come to a consensus on a system of rules before the Commission would establish its own rating guidelines. Just as the Commission would be charged with prescribing one set of guidelines to be followed -- on a voluntary basis -- industry-wide, it is reasonable to conclude that Congress expected any voluntary rules established by distributors under Section 551(e) to be one uniform system arrived at through consensus. This interpretation is borne out by the legislative history, which refers repeatedly to one industry system of rules. The Conference Report, for example, states that the advisory committee provision is only triggered if the Commission determines that "distributors of video programming have not established an acceptable voluntary system for rating programming nor agreed voluntarily to broadcast signals that contain ratings of such programming."⁷² The Conference Report further states that the Commission guidelines and recommended procedures discussed in Section 551(b)(1) "are intended to provide industry with a carefully considered and practical system for rating programs if industry does not develop such a system itself."⁷³ The debate on Section 551 further emphasizes that Congress envisioned the collaborative establishment of one industry rating system. For example, Senator Conrad urged "television broadcasters, cable operators, and other video programmers to take advantage of the 12-month period provided under section 551 to voluntarily develop an identification or rating system that will help parents to make informed decisions about television programming that is appropriate for children."⁷⁴ We therefore believe that Congress intended that we evaluate only the single Industry proposal. We make no finding on the acceptability of other ratings systems, including the Industry proposal as it existed prior to the August 1, 1997 modifications.

26. Because we find that Section 551(e) contemplates that the Commission review only the Industry proposal, we similarly conclude that Congress did not intend that we mandate accessibility to alternative ratings systems. Consequently, our companion technical item issued today does not mandate that the v-chip accommodate alternative rating systems, although it does encourage manufacturers to design TV receivers to provide for additional ratings systems to the extent practical. We envision that the Industry and the manufacturers will work together to accommodate industry innovations in the rating system.

(3) *Voluntary Agreement to Broadcast Signals*

⁷¹See NBC Reply Comments at 1-2

⁷²S. Conf. Rep. 104-230, 104th Cong. 2d Sess. 195 (1996) (emphasis added). See also *id.* at 196 ("The actual effective date has also been made contingent on a determination by the Commission that distributors of video programming have not, by such date, established a voluntary system for rating video programming . . .") (emphasis added).

⁷³*Id.* at 195 (emphasis added).

⁷⁴142 Cong. Rec. S702 (daily ed. Feb. 1, 1996) (emphasis added). See also 142 Cong. Rec. H1171 (daily ed. Feb. 1, 1996) (Congressman Markey refers to the "development of a model rating system as envisioned by this bill").

27. The statute also requires that we determine whether "distributors of video programming have . . . agreed voluntarily to broadcast signals that contain ratings of such programming."⁷⁵ The Industry's original proposal stated: "We have agreed to encode the guideline for each program on line 21 of the Vertical Blanking Interval once the Commission establishes a technical standard. This will enable the 'v-chip' and permit parents to use the TV Parental Guidelines to control children's television viewing when parents are not in the home."⁷⁶ According to the original proposal, the industry group that developed the proposed system "represented all segments of the television industry: the national broadcast networks; affiliated, independent and public television stations nationwide; cable programmers, producers and distributors of cable programming; entertainment companies; movie studios; and members of the creative guilds representing writers, directors, producers and actors."⁷⁷ In its August 1, 1997 submission, the Industry reiterated that "[t]he TV Parental Guidelines are voluntarily and broadly supported by the television industry which has pledged to begin transmitting ratings information on line 21 of the VBI within six months."⁷⁸

28. We recognize that not all video programming distributors have agreed to transmit the ratings system that we have found acceptable. For example, BET has chosen not to participate in the *TV Parental Guidelines* system, and NBC has decided to continue to apply the Industry ratings system as it existed prior to the August 1 modifications.⁷⁹ *Morality in Media* argues that because NBC is an integral part of the industry, its failure to commit to the agreed upon system results in failure by the industry to submit a voluntary plan in accordance with the statute.⁸⁰

29. We do not believe that the statute requires that every video programming distributor nationwide agree to transmit the ratings. Such a reading would mean, for example, that the failure of a single small television station to transmit the ratings would cause the entire system to fail. On the other hand, we believe that participation must be sufficiently ubiquitous to achieve Congress' goals in enacting Section 551, including the goal of permitting parents "to *easily* block violent, sexual or other programming that they believe harmful to their children."⁸¹ The more video programming distributors that do not

⁷⁵Section 551(e)(1)(B).

⁷⁶January 17, 1997 Submission at 4-5.

⁷⁷See January 17, 1997 Submission, Attachment: Parental Guidelines for America's Television Programming, a Background Paper; see also August 1, 1997 Submission at 1, stating the continued support of "television broadcasters, cable systems and networks, and television production companies."

⁷⁸August 1, 1997 Submission at 4.

⁷⁹NBC states that its age-based identifiers are supplemented with content-related information through expanded use, where appropriate, of narrative on-screen and audio advisories. NBC Reply Comments at 4.

⁸⁰*Morality in Media* at 21.

⁸¹Section 551(a)(9) (emphasis added).

participate, and the larger the audience reach of the distributors that do not participate, the more difficulty parents will have blocking the programming they consider inappropriate. We stress that we are not forcing any video programming distributor to transmit ratings, or suggesting that they transmit a particular ratings scheme. Under 551(e), we are required to determine whether, as a factual matter, video programming distributors have voluntarily agreed to transmit the Industry proposal. If we find that they have not, the 1996 Act provides that the Commission shall prescribe "on the basis of recommendations from an advisory committee established by the Commission . . . guidelines and recommended procedures for the identification and rating of video programming that contains sexual, violent, or other indecent material about which parents should be informed before it is displayed to children."⁸²

30. The decisions of individual parties, such as NBC and BET, not to participate in the current Industry proposal can make it more difficult for parents who wish to use content indicators to block programming using the *TV Parental Guidelines*. In the case of BET, which will transmit no ratings at all, parents may be required to use a separate date/time/channel blocking mechanism to block programming (assuming that their television set provides such a feature). As for NBC, a major network, parents will not be able to block programming based upon the different content indicators within each age-based category.⁸³ Under the *TV Parental Guidelines*, for instance, a parent who was primarily concerned about exposing his or her child to television violence could establish a more restrictive standard for the violent programming that would be allowed to enter the home than for sexual situations or strong language. This will not be possible under the NBC approach. Nonetheless, parents will be able to block programming based on age categories.

31. Based on the record, we conclude that Congress' goals will be achieved to a sufficient degree to warrant a finding that video programming distributors have voluntarily agreed to broadcast the Industry ratings system. To our knowledge, the only national video programming distributors that have elected not to participate are BET and NBC. Given this near-unanimity, we believe that the *TV Parental Guidelines* will provide parents with a useful and easy-to-use tool to block programming that they consider harmful to their children.

V. CONCLUSION

32. In their joint statement of July 10, 1997, the Industry and Concurring Advocacy Groups ask that we give the rating system a fair chance to work and allow parents an opportunity to understand and use the system.⁸⁴ Further efforts are underway to provide information and educate parents about the rating system, such as encouraging publishers of periodicals, newspapers and journals to include the ratings with program listings⁸⁵ and making available videos and brochures to parents through local cable

⁸²Section 551(b)(1).

⁸³It is unclear whether NBC's decision applies only to the network and its owned and operated stations, or whether its affiliated stations have adopted the approach as well.

⁸⁴*Joint Agreement*, Attachment 2.

⁸⁵August 1, 1997 Submission at 3.

companies, schools, libraries and civic organizations.⁸⁶ As a result of the joint efforts of the Industry and the public groups who have so diligently participated in the development of the *TV Parental Guidelines* in furtherance of Congress' goals, we believe that parents will be provided with needed information about programming before it is displayed to children and given the technological tools necessary to easily block programming that they consider harmful.

33. Accordingly, IT IS ORDERED that pursuant to the authority found in Section 551(e) of the Telecommunications Act of 1996, the industry's establishment of voluntary rules for rating video programming is consistent with the requirements of Section 551(e) (1) and (2).

FEDERAL COMMUNICATIONS COMMISSION



Magalie Roman Salas
Secretary

⁸⁶According to the cable TV industry, parents and families can contact their cable operator, or write to the NCTA to obtain free of charge a video and brochure describing the rating system, and a peel-off sticker with an abbreviated version of the TV Parental Guidelines to attach to their remote control.

APPENDIX A**Communications Act of 1934
as amended by
The Telecommunications Act of 1996****Subtitle B - Violence****Section 551. PARENTAL CHOICE IN TELEVISION PROGRAMMING.**

(a) *FINDINGS.* -- The Congress makes the following findings:

(1) Television influences children's perception of the values and behavior that are common and acceptable in society.

(2) Television station operators, cable television system operators, and video programmers should follow practices in connection with video programming that take into consideration that television broadcast and cable programming has established a uniquely pervasive presence in the lives of American children.

(3) The average American child is exposed to 25 hours of television each week and some children are exposed to as much as 11 hours of television a day.

(4) Studies have shown that children exposed to violent video programming at a young age have a higher tendency for violent and aggressive behavior later in life than children not so exposed, and that children exposed to violent video programming are prone to assume that acts of violence are acceptable behavior.

(5) Children in the United States are, on average, exposed to an estimated 8,000 murders and 100,000 acts of violence on television by the time the child completes elementary school.

(6) Studies indicate that children are affected by the pervasiveness and casual treatment of sexual material on television, eroding the ability of parents to develop responsible attitudes and behavior in their children.

(7) Parents express grave concern over violent and sexual video programming and strongly support technology that would give them greater control to block video programming in the home that they consider harmful to their children.

(8) There is a compelling governmental interest in empowering parents to limit the negative influences of video programming that is harmful to children.

(9) 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 is a nonintrusive and narrowly tailored means of achieving that compelling governmental interest.

APPENDIX B**Responses to Industry Submission of
January 17, 1997***(electronic mail correspondence not listed)***Comments**

American Academy of Pediatrics
American Medical Association
American Psychological Association
Ameritech New Media
Benton Foundation
Block, Robert S.
Cantor, Joanne (professor, Communication Arts, University of Wisconsin-Madison)
Center for Media Education, American Medical Association, Center for Media Literacy, Children's
Defense Fund, Children Now, Cultural Environment Movement, Institute for Public Affairs of the
Union of Orthodox Jewish Congregations of America, Media Center of the Judge Bate Children's
Center, National Alliance for Non-Violent Programming, National Association for Family and
Community Education, National Association of Elementary School Principals, National
Association of School Psychologists, National Coalition on Television Violence, National Council
of La Raza, National Education Association, National Institute on Media and the Family, National
Parent Teacher Association, Public Media Center, and Teachers for Resisting Unhealthy Children's
Entertainment
Children Now
Children's Defense Fund
Coats, Senator Dan
Collings, Tim (professor, Engineering Science, Simon Fraser University, British Columbia)
Concerned Women for America
Consumer Electronics Manufacturers Association
Cosmos Broadcasting Corporation
Deem, Richard
Douglas, Andre J.T.*
EEG Enterprises
Hutson, William E.
Institute for Public Affairs, Union of Orthodox Jewish Congregations of America
Joint Congressional Letter (signed by 16 Representatives and 7 Senators)
KAMR-TV
KEYC-TV
KWWL-TV
KXLY-TV
Langley, Scott
Lessie Bates Davis Daycare*
Media Access Project (on behalf of Peggy Charren)
Mediascope
Michigan Decency Action Council
Morality in Media, Inc.
National Alliance for Non-Violent Programming
National Association of Family & Community Education

National Coalition on Television Violence
National Institute on Media and the Family
OKTV
Para Technologies, Inc.
Presbyterian Church (USA)
Public Broadcasting Service
Raff, James C.
Salvatierra, Hector Garcia
Thomas Jefferson Center for the Protection of Free Expression
University of California, Santa Barbara Research Team
VideoFreedom, Inc.
Waikman, F. Joseph
WBFX-TV
WGEM-TV
WMTV-TV
WOIO-TV and WUAB-TV
WUAB-TV
WXMI-TV
Writer's Guild of America

**Received After April 8, 1997*

Reply Comments

ABC, Inc.
American Civil Liberties Union
American Library Association
American Psychological Administration
Bronsnick, Andrew
Center for Media Education, American Academy of Child and Adolescent Psychiatry,
American Psychological Association, Center for Media Literacy, Children's Defense Fund,
Cultural Environment Movement, Institute for Public Affairs of the Union of Orthodox Jewish
Congregations of America, Media Center of the Judge Baker's Children's Center, National
Alliance for Non-Violent Programming, National Association for Family and Community
Education, National Association of Elementary School Principals, National Association of School
Psychologists, National Coalition on Television Violence, National Council of La Raza, National
Education Association, National Institute on Media and the Family, National Parent Teacher
Association, Public Media Center, Teachers Resisting Unhealthy Children's Entertainment.
Consumer Electronics Manufacturers Association
Family Research Council
Media Coalition Inc.
National Association of Broadcasters, National Cable Television Association and
the Motion Picture Association of America - Joint Reply Comments
National Campaign for Freedom of Expression
OKTV
People for the American Way

Public Broadcasting Service

Surreply Comments

Block, Robert S.

Hamilton, James T.

Omegapoint Communications (L.Lynn Hinderaker)

Soundview Technologies, Inc. (H.Lee Brown)

The Reporters Committee for Freedom of the Press

Informal Comments Received

Aaby, Patrick
Abbott, Lori & James
Abeyta, Mrs. G.
Abrams, Andrea
Abro, Christine
Ackershalt, S.
Ackerman, Linda
Ackerman, Mildred
Ackerman, Scott S.
Adam, Linda
Adams, Bruce & Carol
Adams, Penny
Adams, Sharon & Mack
Adamski, Brenda
Adelmann, Debbie & Wally
Adgate, Mrs. Charles R.
Adkins, Cindy
Aetersack, Patricia D.
Ager, Pat
Ahlmor, Pamela
Ahrens, Michelle
Ahvens, Arnold J.
Aishman, Sharron
Albina, Sharon
Ali, Patricia
Allen, Cara
Allen, Denise
Allgeyer, David
Allnut, Dale
Allorio, Frank
Alloway, Jennifer
Allred, Edward & Arlene
Allsup, Sue
Almond, Vera
Altizer, Greg & Kim
Alvarez, Karla
Alyea, Mischa
Ambrose, Cathy & Bob
Amico, Susan & Dave
Amsler, David
Anderson, Barry K.
Anderson, Bette
Anderson, Brent & Hollie
Anderson, Brad & Valerie
Anderson, Dan & Holly
Anderson, Donna P.
Anderson, Jane
Anderson, Karen M.
Anderson, Kathy
Anderson, Kim
Anderson, Lorraine
Anderson, Melvin H. & Lurlene M
Anderson, Steve & Susan.
Anderson, Sue
Anderson, Susan
Anderson, Terry G..
Anderson, Vicki
Andre, Sue
Andreasen, Erik, et. al
Andresen, Karen
Angel, Helen B,
 and Coventy, Stanley
Angla, Vickie
Anthony, Lorraine
Applewhaite, Andrew
Archer, Tanya
Arendall, Helen
Argyelan, Peggy L.
Armstrong, Debbie L.
Armstrong, Jeannie
Armstrong, Tim
Armstrong, William G.
Arndt, Samantha E.
Arnett, David Bruce (2)
Arnold, Judith M.
Arnold, Scott & Jane
Arra, Linda & Tom
Arthur, John
Asai, E. & Family
Asay, Tamara
Ash-Larson, Beverly
Askew, Dr. & Mrs. Dennis W.
Askew, William
Atayde, Marylou
Atleberry, Debra
Austin, Ellie
Avioh, Virginia
Aycock, Helen M.
Ayuso, Rosalina (Concilio para la
 Educacion de la Familia)
Babcock, Diane
Babcock, Peggy
Backer, Susan
Backer, Cathy
Backowski, Phil & Mary
Badeer, Deb
Bagge, Burt
Bahr, Jayne
Bailey, Barbara
Bailey, Melissa
Bailey, Shawn
Bailey, Teresa
Bailey, Melissa
Bainett, Carla
Baird, Tamra M.
Bakeman, Sandra
Baker, Lara
Baker, Leesa
Baker, Lynne
Baker, Maydell
Baker, Michele
Baker, Ralph
Baker, Tera L.
Bakker, Linda, et. al
Balan, Debbie
Balcone, Dyanne
Baldauf, Maria A.
Baldwin, Mrs. Jocelyn
Bales, Leonard & Donna
Ball, Lisa
Ball, Patti
Ballard, Vicki
Balm, Ted
Bambas, Karen et. al
Banales, Dolores
Bancroft, Barbara
Bandsma, Marcia
Banker, Jerry & Janet
Bankston, Elaine
Banner, Raymond V.
Barbarich, Valerie
Barber, E. & Jane
Barber, Kathryn
Barbian, Cyndi
Barbie, Judy S.
Barbour, Corinne Charlton
Barker, Sharon
Barlow, Carolee
Barnett, Sandra H.
Barr, Lori E.
Barrett, Steve & Jana
Barrick, Vera
Barron, June E.
Barry, Carolyn M.
Barry, Jeanie
Bartelmay, Janet
Bartlett, Louise S.

Bartolone, Lynn
Barton, Sandra Jean
Barton, Charlene
Bartosh, Terry
Bartoszek, Jan, et.al
Basile, Kim
Bass, Naomi
Bassett, Rona
Bataan, Alvin
Bateman, Carol
Bauer, Rachel
Baumgardner, Rodger & Gay
Baumgartner, Judy
Baxley, Shawn
Bayles, Rachel, et. al
Bays, Jody
Beaman, Nina
Beasley, Cheryl
Beaty, Nancy
Beck, Todd & Elissa
Becker, Marla
Becker, Marlene, Gaudio, Bern
Beckett, Garry & Linda
Beeman, Stacy
Beers, Sandra M.
Beggs, Billie
Begin, Suzanne
Beinel, Patricia
Belford, Mr. & Mrs. Jim
Belgen, Tammi
Bell, Lou Ann
Bellusa, Carla
Belsaas, Leonard & Virginia
Bembibro, Ivonne
Benigro, Debra
Benson, Inga
Bentley, Martha
Benton PTA
Benz, Ron
Berberet, Mr. & Mrs. Bill
Berdine, Wilma
Beres, Nancy
Berg, Dr. Jolene
Berg, Rosanne
Berghorst, Mr. & Mrs. Robert
Bermude, Maria C.
Bernhard, Jane M.
Berry, Laura
Berthelette, Carolyn
Best, Joan, et al.
Beutler, Peg
Beyak, Paula
Beyer, Terry & Becky
Bezek, Carrie
Bickford, Gloria
Bickmore, Mari
Bigler, Ken
Bin-David, Cindy
Bingham, Charlotte
Birarelli, Mary A.
Birnbaum, Amy
Bishop, Max & Betty
Bison, Lisa
Bistline, Chris
Bittner, Larry
Bittner, Tracy
Bixby, Michele
Bizzarri, Viola
Black, Betty R.
Black, Pat
Blackham, Nila
Blair, Lynn Dee
Blair, Wade & Dana
Blake, Dolores J.
Blake, Madeleine
Blalock, Ethel
Bland, James
Bland, Kathleen
Blandford, Brian
Blatnik, Suzanne E.
Blaugh, Cheryl
Blevins, Rhonda
Block, Mitchell & Debra
Blodgett, Marguerite, Piper,
Bloecker, Julie
Blonigen, Sister Mary Adella
Blore, Carmel
Blum, Kathleen
Blumenthal, Carol Pinsky
Boardman, Debra
Boatman, Janet E.
Bobbs, Maxine M.
Bode, Terri (2)
Boden, LoraLei
Boehard, Pam & Steve
Boender, David & Vera
Boerger, Mr. & Mrs. Gaylord
Boersma, Susanne
Bollenger, Christopher
Bollinger, Kelley
Bollinger, Mindy
Bolton, Tammy
Boman, Elizabeth E.
Boman, Michael L.
Bond, Cheryl
Bonner, Ruth & William
Booe, Tinka
Boron, Sandra
Boske, Sally A.
Bostany, Joe & Janet
Bostran, Deborah
Bouchard, Melissa
Boucher, Michael & Pamela
Boughton, Gail
Bowan, Jeanne
Bowden, Kathy (DuBree, Beth)
Bowers, Noah
Bowman, Craig E.
Bowman, M. Anne
Bowman, Ruth S.
Bowser, Daniel
Boyd, Linda
Boyd, Sally P.
Boyda, Laurel
Boykin, Gene
Boykin, Gloria
Boyle, Renee
Bracken, Steve & Tina
Brady, Matt & Shauna
Brage, Sue
Brandt, Thomas
Brandt, Thomas J.
Branson, Michelle
Brawn, Kathleen
Brayman, Dawn
Breedlove, Mary M.
Breen, James D.
Breihan, Jeannette
Brenner, Mr. & Mrs. Marc
Bressette, Bill & Susan
Brewer, Paige S.
Bridges, Helen M.
Bridges, Kimberly A.
Briggs, Shauna Lyn
Brily, Ronald L.
Brinton, Natalie, et.al
Brochu, Laurie A.
Brockman, Pam
Broderick, Janet
Brody, Diane
Broodhead, Teresa
Brooig, Heather
Brooks, Melinda

Bross, Vernice
Brothwell, Bob D.
Brown, Avis
Brown, Christie
Brown, Deborah
Brown, Diane
Brown, Karen, et. al
Brown, Kathy
Brown, Kaylene
Brown, Shari & Brad
Brubaker, Linda
Bruce, Shelly J.
Brull, John V.
Brunk, Sakina F.
Brunson, Burnece
Brunson, Teresa W.
Brunswick Preschool PTA
Bruorton, Darlene
Bryant, Keith G.
Bryce, Mrs. Marlene
Brynteson, Susan
Buchanan, Doug
Buchanan, Jerry
Bucher, Terry
Buchner, Sharon
Buckley, Velma J.
Budz, Virg
Buening, Stephanie
Buesching, Kathleen
Buggeln-Bosworth, Leslie
Buhlen, Victor
Bullard, Virginia
Bullock, LuAnn
Bungard, Barb
Buntz, Mark A.
Burdoin, Erica M.
Burke, Lynn
Burleson, Bill
Burmeister, Jack
Burnam, Marvin
Burns, Linda
Burrell, Sissey
Burton, Diane
Burton, Lara J.
Busbee-Young, Lisa
Bushie, Robin
Bushong, Laura
Buster, Charlotte
Bustos, Terrence
Butler, Caroline
Butler, Geraldine
Butner, Robert
Byers, Sherrie Thomas
Byrd, Derrick
Byrd, Edith
Byrd, Valerie
Cabe, Dorothy
Cabe, Helen
Cahill, Chris & Lisa
Caldwell, Mrs. James
Caleca, Denise
Calkins, Kathy & Mark
Callahan PTA
Calloway, Gladys
Calvert County Council of PTAs
Cameron, Mariah
Camp, Linda J.
Campos, Carol
Candill, Mr. & Mrs.L. Albert
Canfield, Carol
Cannon, Connie
Cannon, Dr. Earl
Cantwell, Chuch & Laura
Caplan, Carolee
Capraio, Janet
Capri, Mr. Les
Capri, Sonia
Cardwell, Mike & Kelly et. al
Carlton, Danette
Carlton, Susan J.
Carlton, Sue
Carluzzo, Mike
Carmosino, Mary
Carnes, Aleta B.
Carney, John W.
Carney, Patricia
Carol, Cathy
Carpenter, Cori
Carr, Allan C.
Carrero, Helen
Carroll, Marilyn
Carroll, Tami, et. al
Carson, Renee
Carter, Carol J.
Carter, Joni
Cartes, Deborah
Cartes, C.D.
Carton, Robin
Carver, Elizabeth
Casalina, Mary Alice
Casey, Barbara
Casey, Geraldine
Casey, Kelley
Casey, Mark
Casey, Phyllis & Patrick
Cash, Betty
Cassidy, Christi
Castro, Ivelisse
Caulfield, Nancy
Caywood, Elsa
Cedillo, Minerva
Celley, Patricia
Cerattan, Holly Smith
Chambers, Doris
Chandler, Jude
Changnon, Marc
Chapin, Cecily M.
Chaplin, Rebecca C.
Chapman, Sandra
Chase, Katherine
Chavez, A., et. al
Chebuhar, Nancy
Cheesman, Creta
Chen, Phertin
Chen, Sharon
Cheng, Susan
Cherven, Arlyne
Chiariello, Kathy
Chorba, John A.
Chorey, Mary
Christison, Michael & Dayna
Christy, Cindy
Chu, Mr. & Mrs. Thanh
Chu-Fong, Frances
Chudoba, Jane C.
Chung, Cathy
Claborn, Judy
Clantier, Debra
Clanton, Shane
Clark, Eileeen
Clark, Jerry L. (and Favorite Hill
PTA Members)
Clark, Lauren
Clar, Leticia
Clarke, William T.
Clautrec, Francois
Clayton, Debbie
Clement, Debbie
Clement, Steve & Debbie
Clementz, Lisa A.
Clermont, Julie
Cleveland, Bev R.
Clevenger, Robin P.

Clibourn, John A.
Click, Eva H.
Clifford, Mrs. Alice M.
Cline, Terry
Cline, Sharon (Community
 Crime Prevention Council)
Clubb, Mary F.
Cnota, Carrie, et al
Cochran, Dana
Cocker, Vickie
Coffin, Kathleen M.
Coghill, Kathy
Cohen, Bonnie
Cohen, Mr. Mark
Cohoon, Edie
Colbeth, Mr. & Mrs. R.
Cole, Terry
Coleman, Bobbie & Curtis
Colie, Hannah & Christopher
Collins, Jani H.
Collins, Karen & Michael
Collins, Nancee
Colvin, Monica
Combs, Sharon
Cone, Cynthia, et. al
Coneys, Megan
Conley, Betty & Mark
Connelly, Sheili
Connolly, Ann P.
Conyers, IlieBelle
Cook, Donna
Cook, Georgeana M.
Cook, Janice L.
Cook, Willie & Virginia
Coombs, James & Josephine
Coon, Stephanie
Cooney, Henry & Eileen
Coons, Lela
Cooper, Hilma F.
 (MCLINC Library Asso.)
Cooper, Karen & Kim
Cooper, Lester
Cooper, Mina A.
Copello, Miguel
Copelton, Jack & Lynn
Copp, Linda
Corbridge, Brenda & Wayne
Cordray, Shelley
Cornell, Mr. & Mrs. Robert
Cornett, Sherri
Cornwell, Mr. & Mrs. Philip
Corry, Eldon
Cortese, Mr. & Mrs. Robert
Cosnowski, Amy Marie
Costello, Rita M.
Cotswold Elementary School
Couch, Tammy
Coughlin, William J.
Coulter, Julie
Covelle, Rita G. (Morality In Media
 of MA) Cowell, Pat, Terrie
Cox, Carol
Cox, Janice
Cox, Julie
Cox, Nina R.
Cox, Stephen
Coyra-Caliens, Madeleine
Crabtree, Barbara
Crabtree, Gene
Craig, Cindy
Craig, David C.
Craig, Scott & Karen
Cramer, Deborah
Cranford, Miriam
Crenshaw, Jean
Crescent View Middle School PTSA
Crew, Aubrey T.
Crocker, Lisa
Crook, Debbie
Crouse, Ja net'
Crow, Elaine
Crow, Robin
Crowe, Susan G.
Crystal Lake Elementary
Cuadra, Maritza G.
Cucher, Terri J.
Culen, Sara
Cullen, Donna J.
Cullen, Trisha
Culver, Diane
Cummings, Karen L.
Cummings, Shirley
Cummisky, Michelle S.
Cummisky, Paul
Cunningham, Kristen D.
Curren, Caroline J.
Currier, Kay
Curry, Nicole
Curry, Amy
Curtis, Pam
Cuvo, Tina
Cyr, Carol
Czerpak, Nina A.
Dacar, Dale & Shelley
Dahl, Brenda
Dailey, K.C.
Dale, Lori
Dalluge, Yvonne.
Daly, Rita
Daly, Mary Jo
Daly, Pamela L.
Daly, Tamera S.
Damiano, Sandra L., et. al
Daniel, Pam
Danos, Nancy
Dansby, Barbara
Darbyshire, Melissa
Darling, Mrs. Theresa
Darnall, Frankie
Daub, Mary, Jack & Sherry
Davidson, Debra M.
Davies, Lester A.
Davies, Patricia
Davies, Rebecca
Davig, Carrol
Davillier, Faneeman
Davis, Dale E.
Davis, Eleanor
Davis, Faye
Davis, James E.
Davis, Kathy
Davis, Marvin & Mary
Davis, Mr. & Mrs. Ray
Davis, Mrs. Paula I.
Davis, Sherry
Davis, Robin
Davis, Terry.
Davison, Ms. Irene
Dawson, Ann
Dawson, James
Day, Donna
Dearing, Julie
DeAtley, Dale
DeCesare, Karen & Kenneth
Decker, Harry J.
Deem, Patricia
Deese, Margaret
Deese, Mary & Phillip
DeFelice, Michele
DeFelice, Nancy
Defenbaugh, Penny
Degen, Diane A.
DeGering, David & Susan

Deishu, Angela	Doss, Ms. Cinderella	Elsaesser, Mrs. Connie
Del Molino, Angel	Dougherty, Deborah	Elvig, Lee Ann
Del Rio, Aida	Dougherty, Julie	Elwell, Martha
Déla Vega, Joseph	Douglas, Andre J.T.	Emerson, Debbie
DeLa Cruz, Ellen	Douglas, J. Scott	Emery, David
Delaney, Jean	Douglass, Mr. & Mrs. Patrick	Emery, Roseanne & Luis
DeLeomlus, Angela	Dowd, Elvia	Endres, ! orraine
DeLeon, Notolio	Doxsie, Winnie	Engels, J.inela
Delgado, Sally	Drake, Marty	Englehart, Carola
Delorme, Elaine M.	Drake, Victoria L.	Enright, Kelly & Ed
Demonte, Linda	Dreisiger, Pamela	Enright, Jim
Demos, Adrian	Dreit, Melanie	Epstein, Karen
Denby, Mindy	Dreterle, Colleen M.	Erdman, Lois
Denham, Rita	Dry, Gravesse	Erickson, Annette
DeSales, Mary	DuCette, Sarah	Erickson, Donna
DeSanto-Alvis, Reena	Duda-Mulligan, Gladys	Erwin, Martha
DeShazier, Paula R.	Dugan, Mr. & Mrs.	Esbridge, Mary
Deslate, Enrico	Duguay, Gretchen	Esplin, Keith & Caryn
Desmond, Dr. & Mrs. Walter	Duhon, DeWayne	Eubanks, Lillie
Despain, Lynn & Merrily	Duncan, Mrs. Maggie	Eudy, Carol
DeValve, Bob & Jean	Duncan, Therese	Evans, Brenda K. (and Anne Arundel PTA Members)
DeVillers, Donna M. (3)	Dunlap, Tiffany	Evans, Hallie
Devlin, Donna	Dunn, Richard & Susan	Evans, N.
Devlin, Jayne	Duque-Estrada, Daniel	Eversole, C.
DeWitt, Rosemary & Ted	Durbin, Betty	Everson, Janet
DeWitt, Leonard W.	Dvorak, David & Vicky	Ewers, Kathryn E.
DiBattista, Rosemary G.	Dworaczyk, Nancy	Eyestone, Susan
Dickey, Donna L.	Dye, Mr. & Mrs. Michael	Fabris, Judy
Diehl, Brenda	Dyer, Tammie	Fafinski, Kristy L.
Diener, Kathryn M.	Eagle Communications, Inc. (Jane English)	Fainell, Christy A.
Dierkes, Kathryn	Earnest, Anita	Faison, David & Kim
Dietz, Jessica	Easley, Patricia A.	Fallico, Susan M.
Diez, Mary	Easterwood, Sharon	Fanshaw, Carol
Dillon, Diana	Eaydes, Lisa	Fascione, Helen C.
Dilworth, Mrs. C.	Eberhardt, Sharon	Fazio, JoAnn
DiMeglia, Blanca	Eby, Susan U.	Faziola, Marilyn
DiNardo, Nancy	Edmondson, Betty J.	Federico, Valerie
DiNardo, P.	Edmonston, Molly T.	Fedorke, Mrs. Helen Lee
Dingman, Laurie	Edmunds, Frank & Kathy	Feeder, Maureen B.
DiPasquale, Angela	Edwards, Martha	Feehan, Kris
Dishman, Tressa	Egbert, Lisa	Feher, Mr. & Mrs. Stephen
Dix, Walter	Egerton, Debby	Felan, Joan
Dixon, Debra	Eghert, Liz	Felder, Maureen B.
Dixon, S.H.	Ehrenzeller, Cindy	Felippi, Karen & Mark
Dixon, Teresa H.	Eisenhauer, Julie	Feninger, Camille
Dodson, Fran	Elam, Maj Carl (Ret.)	Fenter, Karen Kasold
Domen, Anne	Eldridge, Brent	Fernandez, John
Dominick, Kelly	Ellis, Charnoise	Ferrara, Anna
Donahue, Gail	Ellis, Donnie	Ferrier, Mrs. Debby
Donnell, Lillian	Ellison, Sarah	Ferro, Thomas & Jodi
Dooley, Sharron		