

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Children's Television Obligations ) MM Docket No. 00-167  
of Digital Broadcasters )  
 )  
To: The Commission )

**REPLY COMMENTS OF AOL TIME WARNER INC.**

AOL Time Warner Inc. ("AOL Time Warner"), by its undersigned counsel, hereby submits these comments in the above-referenced proceeding regarding proposals to limit or ban interactive features within children's television programming. AOL Time Warner is firmly committed to providing the best in children's content services, whether the medium be video programming, online content, or printed materials. Through its corporate antecedents, America Online, Inc., and Time Warner Inc., AOL Time Warner has demonstrated that commitment through its educational and informative online and offline offerings, and the provision of various parental controls and content disclosures that help parents guide their children's media experiences.

While AOL Time Warner will continue to offer quality content for children—and the tools for parents to ensure children safely enjoy these offerings—we agree with those commenters who note that regulatory intervention to limit or bar "direct links" from children's TV programming to Internet-based content could stifle the development of

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such interactive services.<sup>1</sup> Certainly there is widespread agreement that interactive television has not yet fully emerged in the marketplace.<sup>2</sup> Production of interactive TV programming is just beginning to experience its first developmental push, and it remains to be seen what type of interactive links (both with respect to the content they deliver and the manner in which they operate) will prove successful and beneficial to consumers.

Stifling the growth of interactive features in children's programming risks quashing the creation of such programming in the first place. And, as the Notice in this proceeding points out, imposing such restrictions risks making the programming "less desirable and thus less likely to be selected by children."<sup>3</sup> Government action that could result in retarding the development of innovative children's programming—or discouraging children from viewing whatever TV programming is tailored for them—plainly would not serve the public interest.

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<sup>1</sup> See, e.g., Comments of Viacom, Inc. MM Docket No. 99-167, at 29 (filed Dec. 18, 2000); Comments of the Association of Local Television Stations, Inc., MM Docket No. 99-167, at 27 (filed Dec. 18, 2000); Comments of the National Cable Television Association, MM Docket No. 99-167, at 2 (filed Dec. 18, 2000).

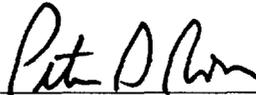
<sup>2</sup> See Separate Statement of Commissioner Michael K. Powell, MM Docket No. 00-167 (rel. Oct. 5, 2000); see also, e.g., Comments of National Association of Broadcasters at 23 (filed Dec. 18, 2000).

<sup>3</sup> See *Children's Television Obligations of Digital Broadcasters (Notice of Proposed Rulemaking)*, MM Docket No. 00-167 at ¶ 32.

For the foregoing reasons, AOL Time Warner urges the Commission to refrain from imposing premature and unnecessary restrictions on interactive features incorporated within children's programming.

Respectfully submitted,

AOL TIME WARNER INC.

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