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Flexible Ratings for Digital TV

The Consumer Electronics Association (CEA) is a proud leader in developing technology to help parents to protect their children from inappropriate programming. CEA literally set the standard for automatic program blocking: CEA-766. This program blocking technology lets parents prevent viewing of programs with attributes (e.g., violence, language, sexual content) they do not want their children to see. The FCC requires this functionality in all TV receivers, so programs that are rated by the program providers can be blocked according to the viewer's preset preferences for a specific set of parameters. For example, content with nudity and/or content with a Motion Picture Association rating above a certain level (e.g., PG, PG-13, R) can be blocked.

The original U.S. TV rating system was fixed and unchanging, but in recent years, the CEA-766 standard has evolved to lay the groundwork for a flexible, "downloadable," rating system. Specifically, broadcasters can transmit a new Rating Region Table (RRT) and associated new ratings codes ("Content Advisory Descriptors") to TV receivers, which can then be configured by viewers to block programming in new ways.

The FCC requires that all TV receivers respond to changes in the rating system, without specifying clearly how to do it. With this paper, CEA seeks to inform the Commission that the most effective and parent-friendly way to implement flexible ratings is by requiring all TV receivers in the U.S. market to be designed to respond to a single downloaded U.S. RRT. This RRT is identified (with the designation "0x05" or "RRT 5") in the current version of the CEA-766 standard (ANSI CEA-766-C), and TV receivers have been built to respond to it. The rating parameters for RRT 5 have not yet been defined. CEA can serve as a venue to bring together new ratings service providers, content producers and receiver manufacturers to encode rating systems into RRT 5 so that the resulting configuration screens for blocking preferences are sensible and usable by consumers.

Why does CEA assert that one downloaded RRT is appropriate for the U.S. market?

- One RRT supports the coexistence of many alternative ratings systems. A single RRT can have enough dimensions (rated aspects) to define parameters for several different ratings systems. This is enough capability for multiple systems to co-exist; for example, Ratings Organization A could define dimensions "Violence-A" and "Language-A," Ratings Organization B could define "Violence-B" and "Language-B," and so forth. Parents preferring rating system A could configure their TV to block according to the System A parameters, parents preferring system B could use the System B parameters. New parameters not yet used in any current system could also be introduced. The practical limit is not the number of RRTs, but the tolerance of consumers to understand and program blocking levels for the many different rating

services that can be contained in a single downloaded RRT.

- Having a separate downloaded RRT for every new, alternative ratings system would be unworkable for the consumer, would deter parents from using the controls, and at worst could actually permit the viewing of material that parents intended to block. If each rating system were to use its own RRT, with an open-ended number of RRTs, different RRTs would soon be in use on different channels. The viewer would repeatedly have to re-program blocking preferences for each newly encountered RRT (upon channel change and/or whenever one of the RRTs was updated), leading to extreme frustration and confusion. Moreover, if different broadcasters in a market were inadvertently to assign the same RRT number to rating tables embodying different rating systems, TVs would fail to detect the difference upon channel change and would respond to ratings improperly, so as either to block *or to allow viewing of programming contrary to the consumer's expressed intention*. Only by coordinating all rating systems in one downloaded RRT, developed by consensus in an open standards organization, can a consistent, easy-to-use, blocking system, that implements rather than frustrates consumers' choices, be ensured.
- The existing, non-downloadable U.S. rating system, RRT 1, is already familiar to consumers and need not go away—RRT 5 offers ways to expand it. It should be clear that RRT 5 can define entirely new rating dimensions to be used in conjunction with those already defined in RRT 1. For example, if the Parents Television Council wished to broadcast its three-level rating system, this could augment the existing Language, Dialogue, Violence, and Sexual Content ratings instead of replacing them.
- The RRT system can and should evolve. RRT 5 contains a “version” field to identify changes to the table. As new ratings organizations develop new ratings systems, they can and should propose their systems to standards organization to have them integrated into RRT 5. Each time CEA publishes a revision to RRT 5, broadcasters will transmit the new table with the new version number, signaling TV receivers that the rating system has been changed so viewers can configure their new preferences. With coordination and consensus, the changes will create minimal disruption during the transition period.

CEA is ready and willing to facilitate standardization of U.S. RRT 5 with participation of all interested parties to produce a flexible rating system that is easy for parents to use and can evolve through time. We ask the FCC to respond to our open Petition by clarifying the obligation for TV receivers to respond to RRT 5, so this important work can proceed.