

COALITION FOR INDEPENDENT RATINGS



www.independentratings.org

November 7, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: *Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 03-15

Dear Ms. Dortch:

Pursuant to Commission rules, please include the attached letter to Chairman Martin and Commissioners from Common Sense Media, the Benton Foundation and the Coalition for Independent Ratings, filed in the above-referenced proceeding.

Sincerely,

Dominic J. Perri
Executive Director

cc: Michelle Carey
Rick Chessen
Amy Blakenship
Rudy Brioche
Christina Pauze
Julius Knapp
Alan Stillwell
Eloise Gore
Mary Beth Murphy
Michael Lance

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Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Commissioner Robert M. McDowell
Federal Communications Commission
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Commissioner Deborah T. Tate
Federal Communications Commission
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Commissioner Jonathan S. Adelstein
Federal Communications Commission
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Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Mr. Chairman and Members of the Commission:

America's transition to DTV in February 2009 promises to usher in a new age of television, bringing new technologies and myriad possibilities for viewers. However, we are concerned that one of those possibilities – improved content ratings that could help parents better select what content enters their homes – may be clipped back before viewers ever know that this advanced capability exists.

In March 2006, the Commission mandated that every digital television must include the capacity to update the content ratings system that powers the V-Chip, which viewers can use to block unwanted programs. This was a highly sensible move, since the existing TV ratings system was nearly a decade old and has been repeatedly criticized as cumbersome and in need of updating. For example, the current system does not allow parents to block programs that glamorize smoking, alcohol abuse or illegal drug use. As well, the present system does not allow for ratings in languages other than English, despite a growing Hispanic population. Finally, several new TV ratings systems have been developed since the present TV Guidelines and MPAA ratings were established, giving viewers a choice rather than forcing them to use an outdated system.

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Ratings systems are carried in Ratings Region Tables (RRT) that are just 1,024 bytes each in size – a minuscule amount of space in today’s memory-rich world of technology. The Commission’s September 2004 (FCC 04-192) ruling specified that "receivers must be able to process newer RRT version numbers or use new rating region codes as suggested by ATSC". The Advanced Television Systems Committee (ATSC) A/65 (PSIP) standard allows for up to 256 RRTs to be defined and, at present, just 5 RRTs have been assigned. The Consumer Electronics Association’s (CEA) Recommended Practice (CEB-12) to its member CE manufacturers specifies that ATSC-compliant DTV receivers should be designed to support and respond to programs rated for more than one RRT since a content advisory may contain ratings from up to 8 RRTs for each program. We agree with the Commission, ATSC and CEA in all of these specifications and therefore see no reason to restrict receiver design to just 1 additional RRT.

Should the Commission rule that set manufacturers only need to provide 1 additional RRT for ratings updates, it would force broadcasters to choose between the following options, since there would not be space for all of them.

- Translate the existing ratings into Spanish, but add no new advisories or ratings systems
- Add one new system in English and Spanish, but do not translate the existing system into Spanish or add advisories
- Add advisories and one new system in English, but nothing in Spanish
- Restrict the information available in these new ratings to such an extent that value to consumers would be minimal

The undersigned organizations are concerned with helping families make informed choices about the content their children view. We urge the Commission to not restrict future innovation in these tables to only one very small table. Rather, we encourage you to ensure ample space for future generations to extend the current ratings and develop new ones as they see fit.

Signed,

The Benton Foundation
Common Sense Media
Coalition for Independent Ratings