
**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
Implementation of the) MB 09-26
Child Safe Viewing Act;)
Examination of Parental Control Technologies)
For Video or Audio Programming)

COMMENTS OF DIRECTV, INC.

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TABLE OF CONTENTS

I.	DIRECTV EMPOWERS PARENTS WITH MULTIPLE TOOLS TO GUIDE THEIR CHILDREN’S TELEVISION VIEWING	2
A.	“Locks and Limits” Program	2
1.	Through Its Website and On Its Informational Channel, DIRECTV Informs Subscribers About Its Parental Controls and How to Use Them	3
2.	The “Locks and Limits” Program is Easy to Use	5
B.	Partnership With Common Sense Media.....	10
II.	CONCLUSION.....	12

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DIRECTV, Inc. (“DIRECTV”) submits these comments in response to the above-captioned Notice of Inquiry (“*NOI*”)¹ issued by the Federal Communications Commission (“FCC” or “Commission”) in accordance with the Child Safe Viewing Act of 2007 (the “CSVA”).² The record solicited here will assist the Commission in the development of a report to Congress on the existence and availability of “advanced blocking technologies.”

As discussed in detail below, DIRECTV³ is an industry leader in empowering parents to control the programming their children watch. Through a combination of DIRECTV’s on-screen menu and website, parents have the power to block programs based on TV or MPAA ratings, lock out entire channels, and even restrict viewing hours and establish pay-per-view spending limits. DIRECTV informs customers of the availability of these controls and how to use them,

¹ *Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video or Audio Programming*, Notice of Inquiry, MB Docket No. 09-26 (rel. Mar. 2, 2009) (“*NOI*”).

² *Child Safe Viewing Act of 2007*, S. 602, P.L. 110-452, 122 Stat. 5025 (Dec. 2, 2008).

³ DIRECTV is the nation’s leading satellite television service provider, with more than 17.6 million customers.

providing parents with both the information and tools to guide what their children watch. Beyond helping parents make and effectuate decisions of what *not* to watch, DIRECTV also has partnered with a leading nonpartisan, nonprofit, private ratings organization to provide detailed, age-based information and reviews for all DIRECTV programming. Through this partnership with Common Sense Media, DIRECTV offers parents the power to identify and select desirable programming, which can be recorded for family viewing with the click of a button.

I. DIRECTV EMPOWERS PARENTS WITH MULTIPLE TOOLS TO GUIDE THEIR CHILDREN'S TELEVISION VIEWING

DIRECTV is committed to delivering family-oriented content and helping parents make informed programming choices for their children. We share the goal, expressed by both Congress and the Commission, of empowering parents to shape their children's television viewing. As described below, both DIRECTV's parental control technology and DIRECTV's partnership with Common Sense Media enhance parents' ability to protect children from programming that a parent deems objectionable and to identify programming that is educational and informational for children.⁴

A. "Locks and Limits" Program

DIRECTV allows every customer to utilize, free of charge, a control feature called "Locks and Limits" that enables parents to restrict access to programming that they, personally, find objectionable for their children. As the Commission explicitly noted in the *NOI*, "satellite

⁴ The CSVA defines "advanced blocking technologies" as "technologies that can improve or enhance the ability of a parent to protect his or her child from any indecent or objectionable video or audio programming, as determined by such parent, that is transmitted through the use of wire, wireless, or radio communication." In the *NOI*, the Commission invited comment on advanced blocking technologies available to satellite subscribers, including what tools are available and how easy they are to use. *NOI*, ¶26.

receivers offer the option of blocking entire channels or blocking individual programs.”⁵ On the DIRECTV system (as explained in more detail below), this customizable feature gives parents the power to block programming based on its TV or MPAA ratings,⁶ lock out entire channels, or even establish a spending limit on a single purchase or pay-per-view event. “Locks and Limits” also can be used to set limited viewing hours, with separate settings available for weekday and weekend limits.

1. Through Its Website and On Its Informational Channel, DIRECTV Informs Subscribers About Its Parental Controls and How to Use Them

DIRECTV’s “Basics Show” runs continuously on DIRECTV Channel 201. This hosted, half-hour program provides information regarding use of the DIRECTV system, including a discussion of the “Locks and Limits” parental controls and how to activate them. Specifically, the Basics Show host says:

MENU can help you set up one very popular feature – parental controls. Sometimes, you might want to restrict what your kids are watching. With parental controls, you can cut off access to programming by ratings, content, viewing hours, and more. To set up parental controls, first press MENU,

⁵ *Id.*, ¶26.

⁶ The movie ratings system is a voluntary system operated by the MPAA and the National Association of Theater Owners (“NATO”). See <http://www.mpa.org/FilmRatings>. The ratings are given by a board of parents who comprise the Classification and Rating Administration (“CARA”). CARA’s Board members view each film and, after a group discussion, vote on its rating. The ratings are intended to provide parents with advance information so they can decide for themselves which films are appropriate for viewing by their own children. Movie ratings include G, PG, PG-13, R, and NC-17. In 1996, the television industry created the TV Parental Guidelines, a rating system designed to give parents information about the content of television programs. See <http://www.tvguidelines.org/ratings.htm>. This system provides parents with information about the content and age-appropriateness of television programs. The ratings include “audience” levels (the age-based audience for which a television program is appropriate) of TV-Y, TV-Y7, TV-G, TV-PG, and TV-MA, as well as “content labels” of D (suggestive dialogue), L (coarse or crude language), S (sexual situations), V (violence), and FV (fantasy violence).

highlight and select “Settings,” and then highlight and select “Parental Controls.” You’ll then find on-screen instructions to set up this feature for your family. And if you’d like to find out more, visit DIRECTV.com/parentalcontrols.

In addition, on the DIRECTV.com website, parents can find clear information about parental controls. The parental controls page says:

Let the Kids Watch, Worry-Free

At DIRECTV, we take the well-being of your family seriously. That’s why all DIRECTV® Receivers give you control over what you and your children watch. Our powerful Parental Controls feature allows you to restrict unsupervised TV viewing however you please.

Use Your Remote Control To:

- *Allow viewing based on MPAA ratings or block specific movies.*
- *Lock out entire channels.*
- *Set limited viewing times.*
- *Even establish spending limits on Pay Per View purchases.*

We Make It Easy

1. *Press the “menu” button on your remote and select “Parental”, then “Edit Settings”. Look for the selections that indicate “Ratings”, “Channel Blocks”, “Spending” or “Hours”.*
2. *Follow the easy-to-understand on-screen directions.*
3. *Select “Lock Now” and you will be asked for a personal identification number (PIN).*
4. *After setting up, you will need to enter your PIN to access restricted programming.*

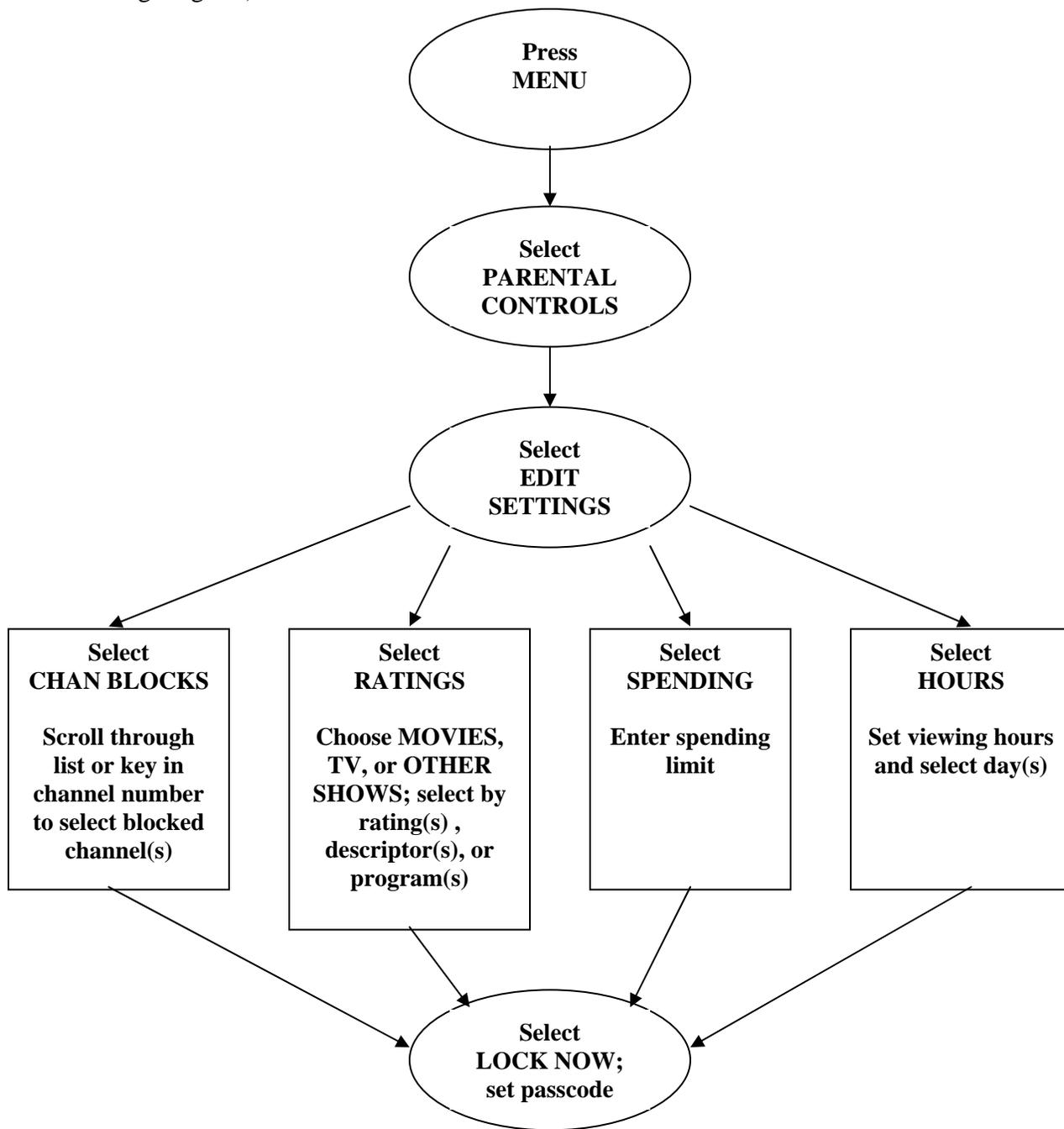
Get More Help with Demos

- *More in-depth step-by-step tutorials are available in our Customer Care Center. You can also consult your system manual for more details.*
- *As a value-added benefit of directv.com, the DIRECTV Video Lounge offers streaming video that shows you how to set up the Parental Controls feature on both Hughes and RCA receiver models. Watch video for Hughes receiver models [[hyperlink to video demo page](#)]. Watch video for RCA receiver models [[hyperlink to video demo page](#)].⁷*
- *Tune in to DIRECTV BASICS on channel 201 and learn how to set up the Parental Controls feature on Hughes and RCA receiver models.*

⁷ The DIRECTV.com/equipment page also refers subscribers to online interactive demos for Hughes, Philips, RCA, and Sony receivers.

2. The “Locks and Limits” Program is Easy to Use

As described above, the controls are accessed in a few quick and easy steps (illustrated in the following diagram):



The main “Locks and Limits” Parental Controls page is easy to access and user-friendly:

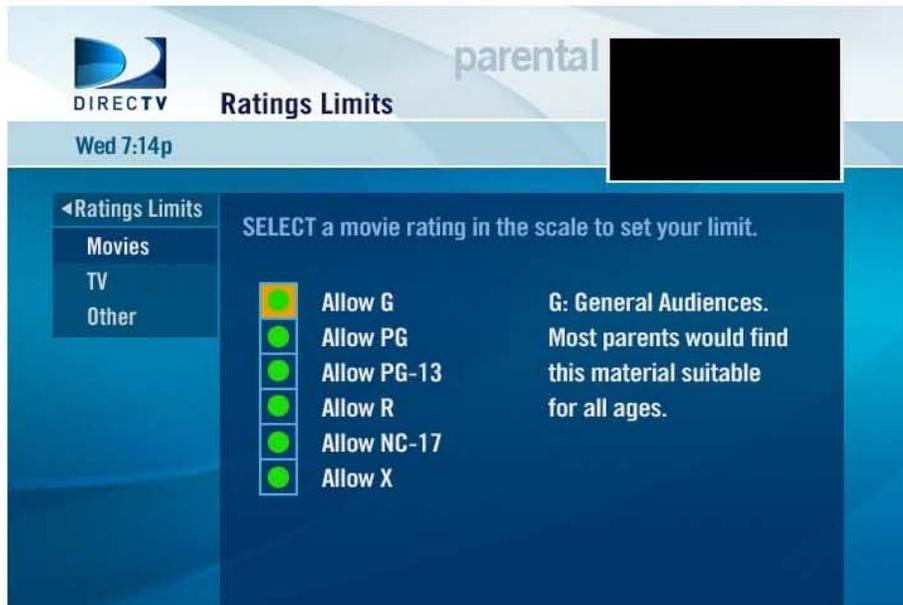


Using “Locks and Limits,” a parent can:

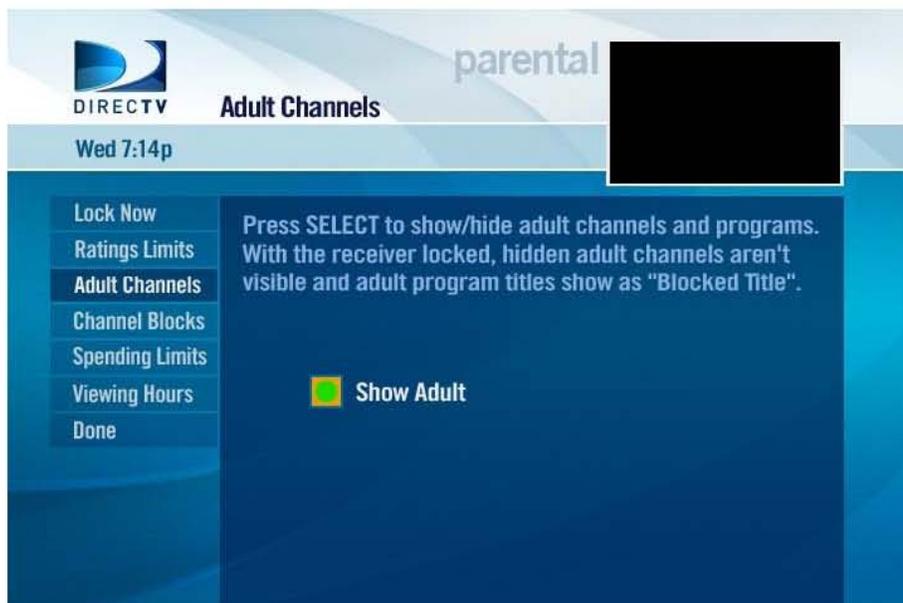
- Block access to all television shows rated TV-PG or above, which would include any television show rated TV-14 or TV-MA (for younger children, a parent may choose to block access to television shows rated TV-Y7 or above), and block access to all television shows within a rating based on one or more content descriptors, i.e., Violence, Fantasy Violence, Sexual Situations, Coarse Language and/or Suggestive Dialogue



- Block access to all movies rated PG-13 or above, which would include any movie rated R or NC-17 (for younger children, a parent may choose to block access to films rated PG or above)



- Hide adult channels (i.e., remove them from a program guide listing) and block adult programs (including listing such programs in the on-screen guide as “Blocked Title” so that no suggestive content is visible)⁸



⁸ The function that allows a parent to “hide” an adult channel listing currently is not available on every model of DIRECTV receiver.

- Block access to all programs on a specific channel at all times



- Establish a spending limit on pay-per-view programming



- Limit viewing hours for all channels (e.g., may be watched for only a certain period of time each day, with the ability to set separate limits for (i) Monday through Thursday, (ii) Friday and Saturday, and (iii) Sunday)



To set any of these parental controls, a parent need only use the DIRECTV remote control and on-screen menu.⁹ Once the restrictions are set, the parent sets a four-digit passcode to lock the controls. An on-screen message, which notes that viewing is restricted and the reason for such restriction, will appear when someone tries to tune a channel or program that is restricted or attempts to spend or watch beyond the limitations set.

⁹ Different models of receivers may vary slightly in the options available under the “Locks and Limits” program.

A “lock” icon appears in the channel information graphic to show whether the system is locked or unlocked, and a parent may enter the four-digit passcode at any time to override the controls and access a restricted program or channel.



B. Partnership With Common Sense Media

DIRECTV also offers parents more detailed programming information on the DIRECTV website, DIRECTV.com. Using the information available online, parents can decide on a program-specific basis which programs to block (by using the “Locks and Limits” program) and even which programs to record for family viewing.

DIRECTV and Common Sense Media recently announced the formation of a partnership to help DIRECTV customers find age-appropriate programming for their families.¹⁰ Through

¹⁰ Press Release, *DIRECTV and Common Sense Media Form Partnership to Help Parents Choose Kid-Friendly Programming* (Mar. 20, 2009) (attached as Exhibit A). Common Sense Media is the nation’s leading nonpartisan, nonprofit organization dedicated to improving the impact of media and entertainment on children and families. Its ratings system helps parents (continued on next page)

this partnership, Common Sense Media’s detailed, age-based programming information and reviews are now available on DIRECTV.com. To access the Common Sense Media ratings information, a parent accesses the programming guide on the website. From there, the parent can click on any television show or movie title in the guide. Once the description for a particular program is open, the parent can use the “Parental Ratings” tab to link directly to Common Sense Media’s information on the program. Common Sense Media provides information not only on the appropriate age for viewing, and the amount and type of violence, sex and language in the program, but also gives suggestions on how parents can discuss the program’s messages with their children. After reviewing the Common Sense Media ratings in the online programming guide, parents can return to the menu to access the “Locks and Limits” program and block a program that is undesirable. Or, for programming that is appealing for family viewing, parents can use DIRECTV’s “DVR Scheduler” function by simply clicking on the “Record to Receiver” tab and scheduling the program to record on their home digital video recorder (“DVR”).

DIRECTV and Common Sense Media also announced that they are working to expand the availability of Common Sense Media content to additional DIRECTV functionalities and programming. For example, DIRECTV anticipates that in the future, the Common Sense Media ratings will be available on information screens accessible through its on-screen programming guide.

make decisions about which movies, video games, TV shows, websites, books, and music are right for their children.

II. CONCLUSION

DIRECTV shares the goal of empowering parents with choices and easy-to-use tools to help shape their children's television viewing, and welcomes the opportunity to discuss any of the DIRECTV tools in more detail at the Commission's request.

Respectfully submitted,

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EXHIBIT A



For immediate release
March 20, 2009

PRESS RELEASE

DIRECTV and Common Sense Media Form Partnership to Help Parents Choose Kid-Friendly Programming

DIRECTV Customers Can Now Find Common Sense Media Content Reviews and Parenting Tips and Schedule Age-Appropriate Programming for Recording on Their DVRs – Only at DIRECTV.com

EL SEGUNDO and SAN FRANCISCO -- DIRECTV (NASDAQ:DTV), the nation's leading satellite television service provider, and Common Sense Media, the nation's leading nonpartisan, nonprofit organization dedicated to improving the impact of media and entertainment on kids and families, have formed a partnership that is helping millions of DIRECTV's customers find age-appropriate programming for their families.

Common Sense Media's detailed, age-based information and reviews for regular, pay-per-view, and DIRECTV on Demand programming are now available at DIRECTV.com. Based on childhood development criteria, Common Sense Media's ratings system helps parents make decisions about which movies, video games, TV shows, Web sites, books, and music are right for their kids.

To access the ratings information, customers click on a TV show or movie title on the DIRECTV.com programming guide and use the "Parental Ratings" tab to link directly to Common Sense Media's helpful information on the program's violence, sexual content, messages, and more, right at the critical point of decision. After reviewing the ratings, parents can use DIRECTV's DVR Scheduler by simply clicking on the "record to receiver" tab and scheduling the program to record on their DVR at home – only at DIRECTV.com.

"Finding age-appropriate TV shows and movies that their kids can really enjoy is a challenge that parents face every day," said Anne Zehren, president of Common Sense Media. "We know that our reviews will be a powerful resource for DIRECTV customers as they meet that challenge to make smart, quality media choices that they can experience together as families.

"Right now, parents can find Common Sense Media reviews online at DIRECTV.com, but we're working to expand that content to on-screen and on-demand programming in the future," Zehren added.

"DIRECTV is committed to delivering the best family-oriented content, and providing our customers with guidance from Common Sense Media is a great way to do this," said Eric Shanks, executive vice president of entertainment for DIRECTV. "Parents are now finding what they need to know on DIRECTV.com to make informed programming choices for their families and then using our DVR Scheduler to set up a recording of that programming on their home DVR. We are looking forward to expanding Common Sense Media's ratings system throughout the DIRECTV experience."

About DIRECTV

DIRECTV, Inc. (NASDAQ:DTV), the nation's leading satellite television service provider, presents the finest TV experience available to more than 17.6 million customers in the United States and is

leading the HD revolution with more than 130 HD channels – more quality HD channels than any other television provider. Each day, DIRECTV subscribers enjoy access to more than 265 channels of 100% digital picture and sound, exclusive programming, industry-leading customer satisfaction (which has surpassed all national cable companies for eight years running), and superior technologies that include advanced DVR and HD-DVR services and the most state-of-the-art interactive sports packages available anywhere. For the most up-to-date information on DIRECTV, please visit DIRECTV.com.

About Common Sense Media

Common Sense Media is the nation's leading nonpartisan, nonprofit organization dedicated to improving the impact of media and entertainment on kids and families. Common Sense Media provides trustworthy ratings and reviews of media and entertainment based on child development criteria created by leading national experts. For more information, visit commonsensemedia.org.

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