

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

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|--|---------------------|
| _____) | |
| In the Matter of) | |
|) | |
| Implementation of the Child Safe Viewing) | MB Docket No. 09-26 |
| Act; Examination of Parental Control) | |
| Technologies for Video or Audio) | |
| Programming) | |
| _____) | |

NOTICE OF INQUIRY

COMMENTS OF DIGITAL MEDIA ASSOCIATION

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Introduction and Summary

The Digital Media Association (DiMA) is an established trade association whose membership has revolutionized consumer media and democratized creative opportunity. DiMA members include Amazon.com, AOL, Apple, Best Buy/Napster, iMeem, Live365, Microsoft, MTV Networks, Nokia, Pandora Media, RealNetworks, Sandisk, Slacker, Spatial Audio Solutions and YouTube. The innovative products and services that DiMA-member companies bring to market have changed – and will continue to change – commerce and politics, as well as how Americans obtain and enjoy news, literature and entertainment.

DiMA members support Congress's goal of empowering parents to control their children's access to content that parents consider indecent or objectionable, while not limiting anyone's access to the widest possible range of appropriate material. In the broadest sense, DiMA members endorse President Obama's goal: to "[g]ive parents the tools and information they need to control what their children see on television and the Internet in ways fully consistent with the First Amendment."¹ The report that Congress has asked the Federal Communications Commission to compile on advanced blocking technologies is a helpful tool to educate parents about the range of tools available to them to help them manage their children's use of the many and ever-changing new media environments.

Moreover, DiMA appreciates that Congress has promoted parental and media industry collaboration and has chosen not to legislate content accessibility rules or mandate particular ratings systems or, with the exception of the v-chip for televisions, technological enforcement tools. DiMA members acknowledge industry's responsibility to participate constructively in the public information and educational process, to develop tools that assist parents make educated

¹ The White House: The Agenda, Technology, <http://www.whitehouse.gov/agenda/technology/>.

choices with their children, and to help parents use tools that are already available.

Although industry's continued development of parental control tools appropriate to different new technologies will not eliminate the need for parents to exercise oversight – and parental responsibility therefore remains critical – industry is doing its part to evolve parental control tools as technology evolves. It is critical, however, to recognize that parental controls – like new media technologies themselves – are still nascent and evolving. It would harm the Internet's innovative environment to mandate parental control solutions as if these technologies and their uses were mature, and not still developing, or to treat all of these new services and applications as if they were the same because they can all be viewed or used on a screen.

In these Comments, DiMA will provide an overview of our member companies' dynamic and evolving services and their business environment, and will detail some of our member companies' steps to assist parents to make educated decisions on behalf of their families, including informational and technological activities. We will also discuss the challenges of developing “advanced blocking technologies,” particularly as they relate to the increasingly complex media delivery ecosystem within which our members operate.

Notwithstanding DiMA's broad-based comments which are provided in a constructive spirit, DiMA and its members are mindful of the First Amendment challenges posed by government-imposed content restrictions, content ratings and technological filters. Additionally, DiMA believes that the Child Safe Viewing Act clearly directs the Commission to focus this inquiry only on audiovisual programming, and that it specifically does not focus on audio-only (e.g., radio) programming or video games. Within the universe of audiovisual programming, DiMA agrees with the suggestion in the NOI that Congress intended the Commission to focus only traditional video programming, which the Communications Act defines as “programming

provided by, or generally considered comparable to programming provided by, a television broadcast station.” 47 U.S.C. § 522(20). User-generated material that is not organized or pre-selected by a programmer or editor is not comparable to broadcast television, nor is non-linear, interactive content featured in many computer and mobile applications. Therefore, the Commission’s inquiry should reflect the Child Safe Viewing Act’s focus on linear television programming rather than on content that is plainly not included in the Act.

Background

DiMA members’ media offerings are remarkably diverse, and are continuously becoming more diverse as global citizens and cultures and markets become increasingly connected. In general terms DiMA members:

- provide digital “new media” entertainment services;
- develop software that powers those services;
- develop related consumer electronics products; and
- market and sell new media products and services to the public.

But this does not convey the complexity and diversity of content delivery platforms and models. Our members offer or otherwise make available musical, spoken word and audiovisual programming. The programming falls within general categories of entertainment, education and research, news, sports, and genres or sub-categories of each. Some of the content that DiMA members make available is linear (i.e., it can be listened to or viewed from end to end), while other content is highly interactive and variable. Some of the content is professionally produced and distributed, and other content is user-generated. DiMA members’ programming and offerings are available for purchase, for passive listening or viewing to content that is streamed,

for interactive participation, and on either (and often both) a subscription or advertiser-supported basis. Moreover, the programming is (or in some cases will soon be) available via a remarkable number of networks and on an extraordinary variety of devices.

Several DiMA members' services are music-oriented, and they have changed the ways that consumers enjoy music and that artists promote their work.

- Apple's iTunes Store revolutionized music purchasing, and along with Amazon.com, Best Buy and several other DiMA members, make finding and acquiring new music easier than ever before.
- Pandora and Slacker offer user-influenced radio that dynamically modifies playlists as consumers inform the service what songs they like or dislike. Pandora and Slacker are available over the Internet, through the iPhone and the Blackberry when the user downloads specialized software (now commonly known as "apps"), through the Sprint Nextel network, and through traditional home consumer electronics systems utilizing specialized media networking equipment sold by, e.g., Sonos, Logitech or Cisco.
- Rhapsody (from RealNetworks), Napster (owned by Best Buy) and Microsoft's Zune service offer music subscriptions that permit users to enjoy all the music they want, streamed from the Internet (including through traditional consumer electronics devices), stored locally on their computer, or stored on mobile phones and specialized portable music devices.
- Live365 and LoudCity aggregate thousands of individually programmed radio stations at www.live365.com and www.loudcity.com, respectively, and make them available over mobile devices also.

Several DiMA members' offerings include audiovisual programming.

- Amazon.com and iTunes sell downloaded movies and television programs that play on consumers' televisions, computers and portable video devices.
- In addition to the Rhapsody music service, RealNetworks offers several subscription services that include news, sports and entertainment-oriented audiovisual programming, which is accessible from a computer or any interoperable device.
- YouTube offers short-form audiovisual programming produced by individual consumers who upload their product to YouTube servers, and also offers professionally produced content from 3rd party licensors including record companies and television producers. Every minute, 15 hours of video is uploaded onto YouTube.

Additionally, several DiMA members offer specialized consumer electronics products that are developed particularly for their own media offerings, but which in some circumstances may also be used to distribute others' programming or services.

- Microsoft's Zune personal media player is integrated with the Zune Marketplace, which offers music and audiovisual programming for sale and for subscription.
- Apple's iPod is seamlessly integrated with the iTunes Store which sells music and audiovisual programming. The iPhone and iPod Touch are also platform devices that render third-party applications which are often oriented toward entertainment media. For example, millions of Pandora and Slacker listeners enjoy those services on their iPhone and/or iPod Touch, rather than through their PC or a single-purpose device.

The complexity and dynamic innovation illustrated by these examples are the basis of DiMA's views as expressed in these comments – that parental education is critical; technological empowerment is important and valuable; but that simple silver-bullet solutions are a virtual impossibility and should not be forced on the market by government.\

DiMA and our Members are Committed to Empowering and Educating Parents About Their Entertainment Choices.

Parental control tools are only useful if parents know about them. To that end, beginning in 2004, DiMA joined with three other entertainment retail associations to promote parental empowerment, education and media choice, through sponsorship of Entertainment Ratings and Labeling Awareness Month. Together, DiMA, the Entertainment Merchants Association, the National Association of Recording Merchandisers, and the National Association of Theatre Owners represent a combined 2,000 companies that operate more than 30,000 theaters, video and video game stores, music stores, online music and media websites, and other retail establishments that offer entertainment products.

Entertainment Ratings and Labeling Awareness Month is scheduled every June as the school year ends, as this is a time when children are likely to be increasing their media activities. The groups develop educational signage in brick-and-mortar stores and movie theatres, public service advertisements on participating websites and in Internet radio programming, and media outreach to promote news stories about entertainment ratings. (See attached Exhibit A which includes examples of local newspaper placements about entertainment ratings; movie theatre signage; screen shots of online public service advertisements about entertainment ratings; an in-store video public service announcement script; and an Internet radio public service announcement script.)

Between June 2007 and February 2008 alone, the Entertainment Ratings and Labeling Awareness Month campaign generated 264 articles in newspapers in 23 states with a readership of more than 10 million people. Additionally, thanks to the widespread participation of our associations' member companies, in the five years of its existence Entertainment Ratings and Labeling Awareness Month activities have resulted in many millions of dollars worth of promotion of entertainment ratings systems.

DiMA Members Inform Parents by Participating in Existing Ratings Systems, and Empower Parents to Manage Their Families' Online Experiences.

In their capacity as retailers or service providers working with pre-recorded professionally-produced content, many DiMA members participate in broad-based industry ratings systems, such as those developed by Recording Industry Association of America and the Motion Picture Association of America. In these contexts DiMA members prominently post ratings information provided by producers in order to inform consumers and specifically to help parents who are engaged with or overseeing their family media experience.

As the Commission is aware, participation in the ratings systems is voluntary. Thus, companies have the flexibility to implement the disclosure of ratings information in the manner best suited to their individual products. For example, in the music context the iTunes Store prominently informs consumers of recordings with explicit lyrics by (a) including a large graphic version of the traditional RIAA-endorsed "Parental Advisory: Explicit Lyrics" label on the dedicated webpage near the album cover or alternative "cover art," and (b) with a red-colored all-capital letters **EXPLICIT** identifier on the playlist listing. Both the traditional graphic and the **EXPLICIT** identifier incorporate hyperlinks to an iTunes page that describes the RIAA labeling policies.

Similarly, other DiMA members post the Parental Advisory graphic on album art and prominently identify in multiple places when albums or individual songs include explicit lyrics. Though digital music and media services utilize different font sizes, different colors and different presentations, the effect is the same – that engaged parents are educated before permitting their children to purchase labeled recordings.

Microsoft has supported ratings and classification bodies for games, music and movies on its Xbox platform and on Zune, its portable music player. For games, parents can use the Entertainment Software Ratings Board (ESRB) ratings to decide what types of game content their children can view and play on the Xbox 360. Similarly, for movies parents can rely on the MPAA ratings to set limits that will apply to movies downloaded through Xbox LIVE Marketplace, physical DVDs inserted into the console's optical drive and movies streamed via a parent's Netflix account. With respect to Microsoft's Zune, parents can restrict access to explicit content (including music lyrics) available through the Zune Marketplace and restrict access to movies or TV programs based on rating.

Thus, DiMA's members have used the extant ratings systems as they have sought to adapt parental controls to their rapidly changing products and marketplace. It should be noted that standardizing ratings and their presentation may not itself help improve parental controls, as different concerns can be raised by different types of applications, as well as needing different processes to develop ratings. To take just one example, the ratings process developed by MPAA for its linear content cannot be the same as the process used to rate interactive games, given the non-linear nature of those products. Our companies maintain interactive relationships with millions of consumers and prospective consumers and are uniformly responsive to consumers' concerns as well as their corporate citizenship responsibilities.

In addition to educating consumers about ratings, several DiMA members are empowering parents with technological tools. For example, Apple's Leopard Operating System lets parents manage, monitor, and control the time their children spend on their Mac computers, the websites they visit, and the people they chat with. Apple's iTunes jukebox application provides parental controls within the iTunes preferences that allow parents to set content restrictions, including by restricting access to explicit content and disabling podcasts. Apple also announced that a new parental control feature for TV shows, movies and apps from the App Store that will be available to iPhone and iPod touch users later this year.

Media Services that Invite Third Party Creators and Applications Present Consumer Information Challenges that DiMA Companies Are Addressing.

In very different ways, YouTube and the iPhone App Store may be the most prominent DiMA member business models that rely in significant part on content that is developed and uploaded by parties not affiliated with the service. Both businesses are quite new, yet both became phenomenally popular virtually overnight due in large part to the ways they invited third party creativity and made it widely available. YouTube and the iPhone App Store show that parental control tools and approaches cannot be based on a backward-looking view of technologies and service models, but must themselves work with the growing number of services that invite third party creative participants. In these environments, creative approaches were needed to accurately, simply, clearly and consistently inform consumers about content that is developed by third parties and made available in vast quantities.

Traditional ratings alternatives simply cannot keep up with the vast quantities of content being developed and marketed through iTunes, YouTube and other open or Web 2.0 platforms. To address parental concerns without squelching the unique and beneficial aspects of these

services, these companies, along with third parties, are developing alternative technologies to meet these new challenges while providing a positive and safe online experience.

The App Store provides simple age-based ratings that allow consumers to quickly identify a game's likelihood of being appropriate for a child. The four ratings categories are for children aged 4+, 9+, 12+ and 17+, and the factors that determine a rating are one click away from each game's "home page" in the App Store. Prominently displayed on each game's home page is the rating and the reasons for the rating, which can include items such as "infrequent/mild cartoon or fantasy violence" for a game rated 9+, or "infrequent/mild mature/suggestive themes" for a game rated 12+.

Every minute, 15 hours of video are uploaded to YouTube. As it is not possible to review in advance this much content, YouTube has developed an innovative, reliable and user-friendly community policing system for users to report potential violations of the "*YouTube Community Guidelines*" by "flagging" the link. Every flagged video is promptly reviewed for compliance with the guidelines by staff who reviews videos 24 hours a day, seven days a week. Users can also contact YouTube directly with privacy or harassment complaints and other policy violations through YouTube's *Help & Safety Tool*.

In addition to the community flagging, all users of YouTube must abide by the terms of use in the *YouTube Community Guidelines* before uploading videos. The *YouTube Community Guidelines* are written in easy-to-understand language and are designed to provide users with clear advice on what content is acceptable and what is not. YouTube is also working to ensure that content is age-appropriate for the intended audience. YouTube users must be signed in to see content that does not breach the YouTube guidelines, but may be inappropriate for users under the age of 18. Further, a warning remains on all such videos stating, "This video might not be

suitable for minors.” To make it less likely for users to stumble upon “age-restricted” content, this content is excluded from commonly-viewed areas of the site such as the “most viewed” page and is algorithmically demoted in browse pages.

In both the App Store and YouTube context, DiMA members are voluntarily experimenting with new consumer education and user notice and choice models to effectively communicate important information to an audience that is also experimenting with the new platform and tools. The explosive adoption of these technologies and platforms by millions of consumers has sparked creative and entrepreneurial energy, investment capital, and opportunity. The Commission should embrace these successes and not propose regulatory or one-size-fits-all industry standards that could inhibit their growth or continuing innovation. Parental controls themselves will continue to evolve and innovate like the underlying products and services.

The Commission should also be mindful throughout this proceeding that government restricting content or restricting innovation that promotes content dissemination may solve a social concern, but the cost will be enormous. Restraining platform innovation will limit access to content that some may deem inappropriate but others consider vital. Government action of this sort will reduce innovation and economic growth, will diminish the First Amendment, creativity and cultural advances.

Attempts to Develop Multi-Party, Multi-Platform, Cross Industry Solutions Have Failed in Other Contexts.

While it is positive and constructive for the FCC to collect and catalog the various parental empower tools available, including advanced blocking technologies, experience in other settings with attempts to develop multi-party, multi-platform cross industry solutions suggests that trying to mandate the development of a one size-fits-all solution will fail. The current

complexity of DiMA members' services, and the rapid pace of technological and business model innovation, creates enormous challenges to the development of "all purpose" services, devices and software applications of any kind. The digital media ecosystem is very different from the relatively static television technology environment that awaited the V-Chip, which was focused on one-way, linear content, transmitted by a broadcaster or a cablecaster to the user for display on the television screen. The development of multi-platform, multi-media advanced blocking technologies that will integrate with multiple ratings systems is an extraordinary undertaking and one which is unlikely to succeed.

DiMA and its members have participated in analogous efforts with respect to digital rights management. Efforts to develop advanced blocking technologies are not unlike historical efforts to develop digital rights management solutions, and the challenges will be at least as difficult.

A multi-party, multi-platform, multi-industry "advanced blocking technology" effort would seem similar to the recording industry's 1998-2001 project to develop cross-platform anti-piracy DRM software for music, known as the Secure Digital Music Initiative. For three years more than 200 companies, associations and consumer groups met in person and collaborated in small groups with a common goal – to prevent copyrighted music from being pirated while permitting it to be enjoyed in ways that consumers expected and on platforms that were then known or being developed. But SDMI was an expensive failure and seems to have marked the beginning and the end of multi-party, multi-industry cross-platform DRM standardization efforts.

The Secure Digital Music Initiative was much narrower than an advanced blocking technology effort that seems to be suggested by the Commission. SDMI addressed only music; the universe of devices and applications was much smaller; and the variations in consumer

choice associated with music were certainly fewer than the variations associated with parental definitions of content that is appropriate for 80+ million families.

What has turned out to be more successful in the area of digital rights management has been the development of single company DRM initiatives, supporting a single music or media subscription service or a specific family of approved devices. Similarly, single company “marketplace” DRM development has also succeeded, as evidenced by Macrovision, Microsoft and others that develop and license DRM solutions to third parties. Additionally, the DVD protection software known as CSS represents perhaps the most successful multi-party DRM standardization effort, but it was limited to a single product (motion picture DVDs) and a single set of non-networked devices – DVD players.

This history suggests that the most likely successful models for parental controls will continue to be those developed in the marketplace to suit specific applications and services. Given the wide diversity of media technologies and consumer services, ranging from passive to interactive, from commercially produced to user generated, from news to literature to art to movies to music, including user-paid and advertiser supported, now is not the time to force single solutions or government mandates.

Conclusion

DiMA and its members fully support empowering parents to exercise the level of control they deem appropriate over the video material viewed by their children. Our companies are already both using existing tools and innovating to create new parental control capabilities to do so. But given the incredible diversity of these technologies and services – which will only continue to grow – parental control cannot be effectively achieved through a governmental

technological mandate. Doing so would both squelch continued innovation in the Internet sector and would lead to less effective parental control tools. The most effective and usable controls will be those that service and equipment providers tailor for their particular user environment.

Respectfully submitted,

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Exhibit A

Ratings education and enforcement

It's time to reinforce our efforts

Each year NATO and our members use the month of June to redouble our ratings education and enforcement efforts. We selected June as the month when children begin their summer vacations. It's the perfect time to remind employees and parents about the movie rating system. Preparation for Ratings Awareness Month 2009 comes at an important time for another reason. NATO learned earlier that the Federal Trade Commission (FTC) intends to undertake another "mystery shopper survey" in the spring or summer of this year. The FTC will employ hundreds of teens aged 13-16 who will attempt to buy tickets to "R" rated movies, and similarly restricted DVDs, video games and music. Indeed, FTC's mystery shoppers could be in your theaters as you read this column. The mystery shoppers will also check theater lobbies and box offices to see whether information about the ratings system is posted where patrons can see it. FTC staff will also examine exhibitor and ticketing web sites.

The FTC's last report in 2008 found that the rate of rating enforcement at theater box offices improved slightly, to 65%, though the Commission described the four-point increase as not a "statistically significant improvement." The report also disclosed that the video game retail industry, at 80% compliance, now has the best ratings enforcement record among entertainment retailers – a distinction previously held by exhibitors.

I strongly encourage all exhibitors to prioritize ratings education and enforcement. NATO members have appointed "ratings compliance officers" within their companies to take responsibility for these efforts. The ratings compliance officers met in Las Vegas during ShoWest to discuss these issues, to compare best practices, and to prepare for Ratings Awareness Month. Ratings compliance officers, and their exhibitor executive colleagues, are urged to undertake steps outlined on these pages.

NATO encourages exhibitors to share your experiences during Ratings Compliance Month with us. And thank you for all your efforts.

INCLUDE RATINGS INFORMATION ON WEB SITES

Ratings compliance officers should work with their company information technology providers to ensure that ratings information is included on your company's web site. Specifically, all movie theater company web sites, all movie ticketing web sites, all ticketing kiosks and all other sites displaying information about movies to which theater company sites are linked should include the following:

- 1 Ratings should be prominently displayed in conjunction with all movies referenced on the site;
- 2 Ratings reasons should be prominently displayed in conjunction with the rating for all movies referenced on the site;
- 3 The site should provide detailed general descriptive information about the MPA/ NATO movie ratings system;
- 4 The site should link to rating information available on other sites, such as parentalguide.org, filmratings.com, or MPAA.org; and
- 5 The site should include additional warnings related to the admittance of people under age 17 to "R"-rated movies, or people under the age 18 to "NC-17"-rated movies.

EMPLOYEE NOTIFICATION REGARDING RATINGS AWARENESS MONTH

Member company executives should notify ALL employees that June 2009 is Ratings Awareness Month, and should describe the company's activities planned for the month. Theater personnel responsible for press inquiries should be made fully aware of all activities undertaken by the company.



ID-CHECK POLICY REMINDER

Member company executives should remind all company employees of your ID-Check policy for "R" and "NC-17" rated films, via company-wide memo, staff meetings, and other appropriate communication channels.



INCLUDE RATINGS INFORMATION AND PROTOCOLS ON ONLINE TICKETING SYSTEMS AND KIOSKS

Ratings compliance officers should review the online ticketing system and ticketing kiosks utilized by your company to make sure that ratings information is included in the system. You should also review the prompts utilized when tickets for "R" and "NC-17" rated movies are ordered to ensure proper age requirement notification.



REACH OUT TO LOCAL NEWSPAPERS

Ratings compliance officers and company marketing executives should contact newspapers with whom you do business to encourage them to include reasons for the ratings in their movie reviews.



PERSONNEL POLICY REVIEW

Ratings compliance officers should review their personnel policies to ensure proper emphasis on ratings education and enforcement. Any updates or enhancements in those policies should be promptly communicated to all employees.



MONITOR ONE-SHEETS TO ENSURE RATINGS INFORMATION IS INCLUDED ONCE THE MOVIE IS RATED

Studio marketing departments should distribute movie posters with ratings information once a movie is rated. Theater personnel must ensure that unrated posters are replaced with rated posters once they become available. If rated posters are not made available after a movie is rated, theater personnel should inform NATO.



REACH OUT TO COMMUNITY, PARENT AND RELIGIOUS ORGANIZATIONS

Company executives and ratings compliance officers should consider using the NATO ratings power point to provide tutorials to local groups on the rating system. Electronic copies of the tutorial can be obtained by going to www.natoonline.org and clicking on the link.



DISPLAY RATINGS POSTERS

Ratings compliance officers should take steps to ensure that posters explaining the ratings system are displayed in every theater complex. NATO distributes these posters to members free of charge upon request.



ENSURE THE COMPATIBILITY OF TRAILERS

Ratings compliance officers and theater marketing personnel should always take steps to ensure that trailers are compatible with the feature film that follows. All trailers should be viewed prior to exhibition, with feature film audience compatibility in mind. Trailers for "R" rated movies should never be shown before films rated "G" or "PG", and should be viewed and assessed before being shown in conjunction with a "PG-13" feature. Exhibitors receiving patron complaints regarding trailer compatibility should inform NATO.

GENERAL PATRON EDUCATION

Company executives and ratings compliance officers should investigate additional ways to use this month to educate patrons about the ratings system. Post your company's ratings policy where all patrons can see. Encourage box office attendants to mention the ratings in their conversations with patrons. Conduct theater open houses and disseminate ratings information. Reach out to local schools. Create employee contests with ratings themes. Be creative and have fun!

ERLAM 2007 PSA
RADIO VERSION

We HEAR coffee being poured and a male voice muttering/humming.

ANNOUNCER

Hello Steve, up all night monitoring your kids' music and video games online?

DAD

Yeah, how'd ya know?

ANNOUNCER

You're drinking coffee by the bucket - and you're muttering something about your "humps."

DAD

Well, the Internet is just so big and scary for parents.

ANNOUNCER

Relax, Steve. There's a better way.

DAD

Get rid of our computer?

ANNOUNCER

Steve, I'm talking about labels. Every movie, CD, online song, video game and DVD has ratings, labels and content descriptors. Finding the right entertainment for your family is simple. Just read the labels.

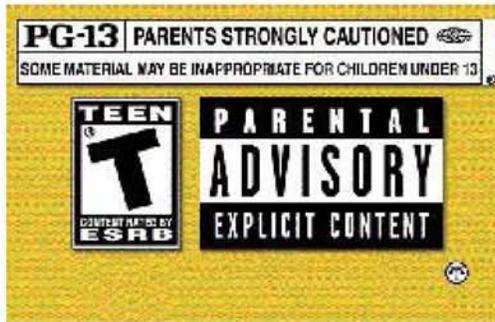
DAD

But what if I like...?

ANNOUNCER (interrupting)

That's up to you and your humps, Steve. Just read the labels next time. And take it easy on the coffee.

PSA Online Advertisements



Ratings Posters



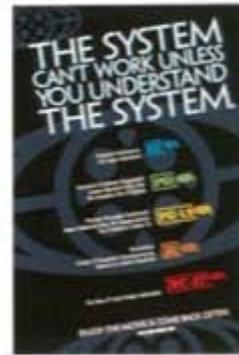
A. The Truth About



B. Attention Parents



C. It Came From...



D. The System



E. Classic



F. Box Office Placard

"ERLAM PSA 2007"

FADE IN:

INT. LIVING ROOM - EARLY EVENING

01 - (:03) Steadicam shot as we walk through a middle class home. We see a couch, TV, coffee table. We see that the TV is off, but we hear the UNIDENTIFIED NOISES sounding like a compilation of movies, video games and music playing from behind a closed door. We move in towards a door and see light coming from underneath it.

02 - (:02) CU on the light under the door. After a BEAT, a pair of feet step into the FRAME.

03 - (:01) CU of a MOTHER's hand as she knocks on the door.

04 - (:01) LS - We see the Mother has walked into the living room and is standing at the door. Mother is early to mid 30's, middle class working mom. Modern but with traditional values.

05 - (:01) MCU - She is carrying a tray with dinner on it. Spaghetti and meatballs (3) with garlic bread and a side salad.

06 - (:08) MS of Mother leaning in towards the door to listen before she speaks. The tray awkwardly held.

MOTHER

(To closed door)

Are you still listening to all those CDs, while playing the video games and watching movies?

DAD (OS)

Yes. I want to make sure they're okay for the kids.

MOTHER

You don't have to do that. Why don't you just look for the ratings or labels? They should tell us all we need to know.

DAD (OS)

No, I need to be involved.

07 - (:02)LS - Mother standing outside of door.

MOTHER

That's nice dear, but you can use some help, you know.

08 - (:04)MS - of door and Mother.

DAD (OS)
No, that's okay.

MOTHER
Your dinner's ready.

DAD (OS)
Just put it by the door. Thanks.

MOTHER
Okay.

09 - (:01) LS - Mother puts the tray down and looks back at the door.

10 - (:01) MS - With a look indicating 'Oh well, I tried to tell him' she walks out of FRAME.

11 - (:01) LS - We see the door and the tray and hold for a bit.

12 - (:01) XCU - The top meatball rolls off the pile of spaghetti noodles with a slow PLOP.

13 - (:01) CU - We SEE a clock's hands SPINNING WILDLY.

INT. LIVING ROOM - NIGHT

14 - (:01) LS - The Room is dark because it is late.

15 - (:01) CU we see the light flickering under the door as the NOISE GET LOUDER and CRAZIER

EXT. CITY - MORNING

16 - (:02) LS - TIME LAPSE of the sun rising. SOUND of ROOSTER CROWING

INT. LIVING ROOM - MORNING

17 - (:01) CU of Mother's hand knocking on door.

18 - (:02) LS - Mother is standing in front of the door and looks down at uneaten food.

MOTHER
Honey, breakfast is ready.

19 - (:03) CU of the flickering light coming from under the door along with the MIX OF SOUNDS. After a BEAT, it goes dark and the NOISE STOPS ABRUPTLY.

20 - (:01) MS of Mother reacting

21 - (:01) CU of the doorknob turning.

22 - (:01)LS - DAD opens the door. Dad is in his mid to late 30s and friendly looking. He comes out of the den.

23 - (:01)MCU of Dad. His eyes are spinning; his hair is sticking straight up. He looks overloaded and exhausted.

24 - (:03)MS as Dad stumbles into the doorway with a stack of games, CD's and DVD's. His clothes are rumpled.

DAD

I should have read the ratings
and labels...

25 - (:02)LS as Dad staggers out of the doorway and down the hall MUTTERING ABOUT READING LABELS AND RATINGS. Mother picks up the tray.

*Mutterings: It's all there, the ratings, what to expect, age range, music lyric labels, content descriptors. It was there all the time, all the time. Why didn't I listen? I'm still involved if I look at ratings and labels to guide me, right? I'm still involved, I'm still involved, I'm still involved... I'm still... hungry.

26 - (:06)*****Motion graphics of various rating systems, logos and graphics can fly about for the Announcer. A type treatment of 'Read the Label' to give it punch.

ANNOUNCER

Every movie, CD, video game, and
DVD has ratings, labels and
content descriptors. Finding the
right entertainment for your
family is simple. Read the label.

FADE OUT.

Pointers For Parents

Making The Right Entertainment Choices

(NAPS)—America's children are avid consumers of movies, music and video games. But sometimes their entertainment choices may not be appropriate for them. How is a parent to make sure that the latest hit movie, hot video game or chart-busting album is right for their child?

The Coalition of Entertainment Retail Trade Associations (CERTA), an umbrella group for movie theatres, video and video game stores and music retailers, encourages parents to take a few simple steps to ensure that entertainment is appropriate for their family:

- First, look for the advisory. All video games and most motion pictures carry a rating. Complementing the rating is a "content descriptor" that explains why the game or movie got the rating that it did. Music that contains explicit content displays a "parental advisory" sticker on the album cover or an "explicit" warning in the online download catalogue. Use these advisories to make sure the video game, movie or music is appropriate for your child.

- Second, watch movies, listen to music, and play video games with your children. (Sure, it may not always be easy or even welcomed, but it is important to make the effort.) Talk to your children. Make sure they understand what the ratings and labeling are about, and what they can learn from them.

PG-13 PARENTS STRONGLY CAUTIONED
SOME MATERIAL MAY BE INAPPROPRIATE FOR CHILDREN UNDER 13



Industry advisories can help parents decide which forms of entertainment are suitable for their children.

- Third, set appropriate limits. Like any form of entertainment, music, movies and video games should not be permitted to interfere with school work, exercise and other important activities.

- Finally, for those lucky enough to have an Xbox 360 video game console, check out the parental controls. You can set the console so that Mature- and Adult Only-rated video games will not play on the system. (The soon-to-be-released PlayStation 3 and Nintendo Revolution will also contain parental-control mechanisms.)

Entertainment can educate, amuse, inspire and challenge. There are movies, video games and music for every age group and interest, but not every choice is right for every audience. Using these guidelines, parents can make sure that their choices are the right ones for their family.

For more information, go to www.erlam.org.

Did You Know?

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