

COALITION FOR INDEPENDENT RATINGS



www.independentratings.org

June 2, 2009

Ex Parte

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

Re: *Ex Parte Presentation, MB Docket No. 03-15*

Dear Ms. Dortch:

On June 1, 2009, Dominic Perri, Executive Director of the Coalition for Independent Rating Services (“Coalition”) met Rosemary Harold, Legal Advisor to Commissioner Robert M. McDowell. The Coalition represents independent ratings providers whose mission is to educate the public on the benefit of content advisories that are developed independent of content producers.

The Coalition presented three issues relating to the recent FCC NOI process:

- Local broadcaster capacity to transmit additional ratings systems: The Coalition expressed concern that the capacity to provide additional ratings for broadcast television has never been tested in an over-the-air setting. It is not clear that broadcasters have the necessary software and therefore the ability to include new or revised ratings information in their transmission stream. This despite the broadcaster PSIP requirements outlined in the *Second Periodic Review of the Commission’s Rules and Policies affecting the Conversion to Digital Television* that Rating Region Table transmission was that “broadcasters would have to transmit a new RRT in order to transmit the new or additional ratings information¹” It is crucial that this functionality be tested; otherwise the Commission could face an insurmountable legacy problem in the coming years. To date we do not have information that any broadcast station has the capability required for an RRT 0x05 table download.

¹ *Report and Order, In the Matter of Second Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 03-15, FCC 04-192, page 67, footnote 354

- Development of a Ratings Standard: The Coalition believes the only way to truly have collaboration across platforms is to develop a common standard. Many industries (hardware and software) have standards bodies that create and maintain agreed-upon standards. These standards provide a common baseline that fosters and enables collaboration. Such a common baseline is missing for rating, filtering, and blocking media content, with many negative effects. Each type of media has its own rating, filtering, and blocking services that often have little in common. Consumers find it difficult to learn the many different systems and also have no way to compare them. A common standard would provide a baseline that would allow consumers move more easily from one system to the next and to make comparisons. The Commission could play an important leadership role by stating the need for such a standard and convening a group to work on its development.
- Consumer Access to Ratings: We believe that the Commission must also examine the degree of access that Americans have to the many rating, blocking and filtering services currently in existence. More importantly, the Commission should look for remedies in the many areas where these services are not available. It is too simple to say that there are many systems and Americans can choose from among them.
- Parents not only need choices but they also should have access to those choices at key decision-making moments. This is currently a major problem. While there are a dozen TV ratings systems, broadcast TV viewers only have the option of using the TV Parental Guidelines and MPAA ratings for blocking programming with the V-Chip. The other ratings systems are not available to viewers for use with the V-Chip. The usefulness of these ratings systems to parents is greatly diminished if they are not able to access them when they are making their decision regarding what programs to block with the V-Chip.

The Coalition encourages the Commission to address these three issues in its report to Congress as part of the requirements of the Child Safe Viewing Act of 2007.

Sincerely,

A handwritten signature in black ink that reads "Dominic J. Perri". The signature is written in a cursive style with a large, stylized 'D' and 'P'.

Dominic J. Perri
Executive Director
Coalition for Independent Ratings Services

cc: Rosemary Harold