

COALITION FOR INDEPENDENT RATINGS



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June 4, 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 3, 2009, Dominic Perri, Executive Director of the Coalition for Independent Rating Services (“Coalition”) had a conversation with Rudy Briocche, Legislative Advisor to Commissioner Jonathan S. Adelstein. 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 focused its presentation on the following issue 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

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*

date we do not have information that any broadcast station has the capability required for an RRT 0x05 table download.

The Coalition encourages the Commission to address this issue 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, prominent "D" at the beginning.

Dominic J. Perri
Executive Director
Coalition for Independent Ratings Services

cc: Rudy Brioche