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Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: A National Broadband Plan for Our Future – GN Docket No. 09-51

Dear Acting Chairman and Commissioners:

Common Sense Media (“Common Sense”) hereby submits its comments in response to the Commission’s Notice of Inquiry (“NOI”) concerning a national broadband plan, GN Docket No. 09-51. Common Sense is one of the nation’s leading non-profit organizations dedicated to improving the media lives of kids and families. Its mission includes educating and empowering parents on how to understand and manage what their children see, hear and surf. Common Sense provides information about Internet smarts and safety in schools and community settings as well as trust worthy ratings and reviews of various media (i.e., movies, television, video games) via its web site to help parents determine whether media is appropriate for their children.

Introduction: Why Broadband is so Critical to Improving Education and the Lives of America’s Children

The Internet and digital media bring many opportunities for economic and educational development, but as many parents and educators have realized, they can also pose potential negatives. A national broadband plan is essential not only to bring ubiquitous high-speed access, but to ensure that our nation makes the most of the chance to create new educational and social development opportunities for America’s children.

It is worth noting that in its early years, television was hailed for its potential to deliver educational content. The 1950's are often referred to as "the golden age" for children's television because of the quantity and quality of educational programming. Just a few years later, however, then-FCC Chairman Newton Minow famously called most TV programming a "vast wasteland."¹

Today we stand at a similar pivotal moment for broadband. The Internet is no longer in its infancy, but digital media is growing rapidly and becoming increasingly important in so many facets of the lives of children. Tens of millions of young children are online every week, and they can use the Internet to access vast quantities of educational and informational material, or to find content that makes TV's vast wasteland look like the Promised Land. Broadband will make digital content even more accessible, whether the content is good or bad, so we need to view the expansion of broadband through the lens of our children.

Broadband "can help to restore America's economic well-being and open the doors of opportunity for more Americans, no matter who they are, where they live, or the particular circumstances of their lives,"² or it can be a largely wasted opportunity. The key to the difference will be preparing our children – and their parents and teachers – to make smart and safe choices about what children find, do, share and create in the broadband world, and thereby to help transform schools and communities across the country.

How do we ensure that America's kids have the knowledge, ethics, and skills they need to harness the educational and economic power of the digital world, and to avoid its potential dangers? This critical question requires urgent attention from policy makers, parents, educators, and the media industry, and it should be a centerpiece of our national broadband plan. Working together, we must create the teaching and parenting tools that will enable us to educate, empower, and protect our children, and bring teachers and parents up to speed as well. A national broadband plan must

¹ Newton Minow, "Television and the Public Interest" speech to the National Association of Broadcasters, May 9, 1961.

² NOI at 1.

- Help families and schools learn how to find quality educational content online and on other digital platforms;
- Encourage the creation and dissemination of more and better quality educational content;
- Ensure that all Americans have access to easy-to-use tools, information and technology they need to make the most of the educational, economic and social opportunities online; and
- Promote basic Digital Literacy and Citizenship skills among all Americans as we move into this new digital era.

Education is Key: The Need for Digital Literacy and Citizenship

A national broadband plan will help close the digital divide in education and economics, and bring valuable resources and opportunities to all children and families, in every community. But successful broadband implementation can't be just about wiring and hardware. Broadband investment won't really bring the rewards we need unless we ensure that America's youth have the knowledge, skills, and ethics they need to harness the power and the potential of this increasingly digital world.

In the Notice of Inquiry, the Commission notes that "education is the key to our future economic success."³ And while science, technology, engineering and mathematics (STEM) have received considerable attention in recent years, we must also recognize the importance of 21st century skills such as critical thinking, innovation, collaboration, digital literacy and digital citizenship.

These 21st Century skills will improve our children's educational opportunities and achievement levels. And they will enable them to build their – and our nation's – economic future. Equally as important, these skills will help children (and their parents) use digital media and technology responsibly, ethically, and effectively.

To prepare children to live, learn and thrive in this digital media world, we need Digital Literacy and Citizenship programs that will help children understand how digital media impacts the way

³ NOI at 89.

they socialize, communicate, gather and process information, participate in political and economic life, and form opinions and values. Families and educators need to help children learn how to be media savvy and safe, to search for age appropriate content, and to be careful and ethical with regard to their own digital conduct. And to do this, parents and teachers need guidance and training as well.

Digital Literacy is essential for online learning, and it is also the best way to keep kids safe online. When children are younger, parents can use filters and blocking technologies to protect them from content that may be negative or dangerous – though many parents need to be educated about these tools and how to use them. However, as children reach their “tween” and teen years, many become more technically savvy than their parents and teachers, and can often defeat filters and access content from many different devices outside of the home. This makes it even more important to teach kids (and adults) how to stay safe, and how to behave responsibly and ethically in a digital world.

Essential components of comprehensive Digital Literacy and Citizenship programs include:

- **Basic media and technology skills** – using computers and other tech and media tools as part of core curriculum in every American school.
- Understanding how to use the Internet and other digital tools to **research, evaluate and apply information** appropriately.
- Learning to **communicate and collaborate** through digital and online environments.
- **Creating** new digital media content in ways that enhance learning.
- Helping students **think critically** about media they consume and create.
- **Digital citizenship** – learning not only about digital content, but also about proper digital *conduct*, and developing safe, legal and ethical behaviors for the digital world.

Developing Digital Literacy and Citizenship Programs in Every School and Community

There are several steps to developing comprehensive Digital Literacy and Citizenship programs

for every school and community in America as part of this broadband plan⁴:

1. Fund professional development for educators

- Create a national Digital Teacher Corps for on-site training, to improve educators' facility with technology and media, and with basic tenets of digital learning.
- Provide professional development and support through existing structures, including state Departments of Education and community college and university systems.

2. Create basic resources for educating teachers, parents, and kids

- Resources that reflect the constant changes of the media world, presented through the Internet and other digital media, on flexible platforms that can be regularly redefined with new information and experiences.
- Programs must be modular and scalable – lessons and ideas that can be incorporated into existing curricula at each age and grade level.
- Curriculum and educational resources should be disseminated through the schools, as well as community programs, after-school activities, and parent engagement networks.

3. Deliver education/technology resources in under-served schools and communities

- Provide technology support and staff development for under-served districts to ensure that digital media and technology are fully integrated into the neediest schools.
- Fund and hire a national corps of technology support specialists.
- Continue to upgrade and retool school facilities and equipment.
- Coordinate efforts with other related legislation and funding.

4. Make Digital Literacy and Citizenship essential parts of every school's basic curriculum

- Incorporated into existing courses – including English, math, science, and history – at each age and grade level in all K-12 schools in the United States.

5. Ensure strong interagency coordination

⁴ See Appendix A for a detailed explanation – Digital Literacy and Citizenship in the 21st Century, a Common Sense Media White Paper.

Digital Literacy and Citizenship are educational issues, but their development should involve many different agencies and programs, and must be well coordinated at the government level. The Federal Communications Commission (FCC) recognized in the recent Report on a Rural Broadband Strategy that a broad cross-section of federal agencies are needed to implement the nation's broadband agenda,⁵ and digital literacy programs should involve similar coordination, with the Department of Education, National Telecommunications Information Administration, Federal Trade Commission, FCC, Department of Health and Human Services, Department of Justice, and the Rural Utilities Service.

Digital Literacy Programs Will Encourage Increased Demand for Broadband

Investing wisely in education and Digital Literacy efforts will also increase demand for broadband. These Digital Literacy programs will build awareness of the benefits of broadband, the Internet and digital technology, while also addressing parent and teacher concerns about the potential dangers of the digital media world.

One of the primary reasons why some consumers have not adopted broadband is related to perceived value and relevance. According to the Pew Internet & American Life Project's *Home Broadband Adoption 2008* study, nearly fifty percent of adult non-users cite relevance (or irrelevance) as a reason why they do not go online:

- 33% of non-users say they are not interested,
- 9% say it is too difficult or frustrating,
- 7% say it is a waste of time.⁶

Home Broadband Adoption 2008 found that “even when controlling for the number of information devices a person may have and other factors, there is a significant correlation between attitudes about information technology and people's choice of connection speed. How people view the productive potential of information technology is important – and not everyone

⁵ Report on a Rural Broadband Strategy at 5 and 57.

⁶ John B. Horrigan. *Home Broadband Adoption 2008*. Pew Internet & American Life Project, July 2008.

sees this potential in the same way.”⁷

Along the same lines, a 2008 Connected Nation survey asked consumers why they don't own a computer, and nearly two-thirds (62%) of respondents answered “I don't need or don't know if I need a computer,” compared to one-quarter (24%) who answered “too expensive.” Similarly, when respondents were asked why they do not have broadband at their home, 44% answered “I don't need broadband,” compared with 23% who said it was “too expensive,” and 14% who said “broadband is not available in my area.”⁸

Especially in underserved communities, parents and teachers may not recognize the educational and economic potential of broadband access and digital technology for themselves and their children – and may be even more concerned about the potential dangers of the digital media world. A national broadband plan must address this head on.

Conclusion

The nation whose children best harness the educational and creative powers of digital media will write the economic and educational success story of the 21st century. Digital media is bringing significant changes to the ways that kids live and learn – and those changes can create opportunities or pose potential dangers. We need to fund teachers, curricula, and parenting tools that prepare kids and adults to better understand and manage media's role in their lives. The emerging fields of Digital Literacy and Citizenship are the keys to that preparation. They deserve America's investment and leadership today, and should be at the heart of the national broadband plan.

Digital media literacy programs will spur broadband adoption by helping educators, parents and community leaders see how broadband and digital technology help children learn and prepare them for the high tech jobs of the future. Equally as important, digital media literacy programs will teach adults how to keep children safe and smart in the digital world. By building awareness

⁷ Id.

⁸ “Consumer Insights into America's Broadband Challenge,” *Connected Nation Policy Brief* (Oct. 13, 2008). (Available at: http://www.connectednation.org/documents/ConsumerInsightsBroadbandChallenge_20081013.pdf).

of the positives of broadband – and addressing the potential negatives – digital media education efforts will encourage broadband adoption and ensure that our broadband investment brings the rewards our nation requires.

Speaking before the National Association of Broadcasters 48 years ago, FCC Chairman Minow closed with a plea and a promise – “I urge you to put the people’s airwaves to the service of the people and the cause of freedom. You must help prepare a generation for great decisions. You must help a great nation fulfill its future. Do this! I pledge you our help.” As parents and educators who embrace the potential of technology, we urge the current FCC to help prepare a new generation for great decisions that lie ahead of them...decisions that will help shape our nation’s – and our children’s – future.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim", with a horizontal line above the first part of the name.

James P. Steyer
Founder and CEO



A Common Sense Media White Paper

To adults it looks like a brave new world – but to kids, it’s “just life.” Welcome to their world.

- 93% of kids 12 to 17 are online ¹
- More than 13 hours of videos are uploaded to YouTube every minute ²
- A majority of teens view their cell phone as the key to their social life ³
- If Facebook were a country, it would be the 5th most populous in the world ⁴
- The average 2- to 11-year-old streams more online video than their parents – nearly two hours per month ⁵

¹ Pew Internet and American Life Project, “Generations Online in 2009”

² Googleblog, “The Future of Online Video,” September 16, 2008 - <http://googleblog.blogspot.com/2008/09/future-of-online-video.html>

³ CTIA – The Wireless Association and Harris Interactive, “Teenagers: A Generation Unplugged,” September 12, 2008

⁴ Business Insider, April 8, 2009

⁵ Nielsen Online, June 2008

What is Digital Life? Digital life describes the media world our kids inhabit 24/7 – online, on cell phones and mobile devices, and anywhere media is displayed. By definition, digital media is participatory. The users create the content, and anything created in this digital life becomes instantly viral, scalable, replicable, and viewable by vast, invisible audiences. Kids use digital media to socialize, do their homework, express themselves, and connect to the world. New technologies give our kids unprecedented powers of creation and communication, making the world more accessible and comprehensible at earlier and earlier ages.

The Need for Digital Literacy and Citizenship. This dynamic new world requires new comprehension and communication skills, as well as new codes of conduct, to ensure that these powerful media and technologies are used responsibly and ethically. Much of the interaction in this digital world happens at a distance, which can diminish the rules of cause and effect, action and consequence. Additionally, much of digital life takes place under the cloak of anonymity, making it easier to participate in unethical and even illegal behaviors.



Digital Literacy means the ability to:

- > use technology competently
- > interpret and understand digital content and assess its credibility
- > create, research, and communicate with appropriate tools

Digital Literacy programs are an essential element of media education and involve basic learning tools and a curriculum in critical thinking and creativity.

Digital Citizenship means that kids appreciate their responsibility for their content as well as their actions when using the Internet, cell phones, and other digital media. All of us need to develop and practice safe, legal, and ethical behaviors in the digital media age. Digital Citizenship programs involve educational tools and a basic curriculum for kids, parents, and teachers.

What's at stake. America's children are growing up in the center of a technological revolution. Digital media defines their lives in unprecedented ways; they spend more time online, texting, watching TV and movies, and playing video games than they do in school or with their parents. The convergence of portable personal technologies, unfiltered access to information, and user-generated content profoundly impacts how children grow and learn. The line between digital life's perils and possibilities is thin. The stakes are high. Our kids know more about this world than most of the adults in their lives do.



What do we, our kids' stewards, need to do to ensure that America's youth will have the knowledge, ethics, and skills they need to harness the power and the potential of this digital world?

This is the central question that requires urgent attention from policy makers, parents, educators, and the media industry. In partnership, we must create the teaching and parenting tools that will enable us to educate, empower, and yes – protect – our children.

The ease with which content and communications are created or retrieved, the instantaneous and often anonymous nature of digital communications and content creation, the definition of privacy as we knew it – all these issues are now an essential part of a child's education. But even the nature, location, and responsibility for this education now occurs largely outside the classroom – indeed, the walls have come down between school and home altogether. Thus teachers and parents face new and unprecedented challenges and opportunities.

Literacy and Citizenship Goals for the 21st Century:

Educate.

Create tools and curricula that teach digital media literacy and citizenship.

Empower.

Give parents and teachers the tools and information they need to raise kids to be informed digital citizens.

Protect.

Define a healthy balance between safe and smart digital media practices for kids and families and other important societal rights.

We have a president in the White House who understands what's at stake. "We're preparing our kids for 21st-century jobs by sending them through the doors of 20th-century schools," he has said on more than one occasion. President Obama is committed to education, and, to him, education and technology are inseparable. He understands that our future leaders must have strong digital technology skills and an unshakable ethical foundation underpinning their behavior in the digital world.

This White Paper is an effort to outline essential components of Digital Literacy and Citizenship and to frame the ways that they prepare children to learn and grow in the 21st century. Like the digital world itself, the concepts of Digital Literacy and Citizenship are complex and changing, and this paper is intended for constant updates and revisions, which can be found at www.common sensemedia.org/digitalliteracy.

Strategies for Teaching Digital Literacy and Citizenship:

- 1 Redesign education to include Digital Literacy and Citizenship in every school in America.
- 2 Disseminate a basic curriculum that defines the standards of ethical behavior on digital platforms – for students, parents, and educators.
- 3 Educate and empower teachers so that they can understand and teach Digital Literacy and Citizenship.
- 4 Educate and empower parents about technology and important behavioral guidelines involving the use of digital media.



To survive and thrive, today's students must be digitally literate, which means being able to use and understand digital technologies and messages. **These new media literacies must become integral parts of their education, both for traditional studies (reading, writing, math, science) as well as for the 21st-century skills they will need to succeed (creativity, innovation, communication, critical thinking, civic participation). Ensuring that our kids are prepared for the future requires the following essential initiatives:**

1

Redesign education to include Digital Literacy and Citizenship in every school in America

Incorporate new media literacy into existing curricula. Media education should be integrated into the curriculum of every school in America. Because of the nature of content creation in digital media, kids must be able to use digital tools to gather, evaluate, and apply information; to evaluate that information intelligently; and to create content ethically.

Teach basic media education and technology skills in schools. Media and technological literacy is essential for our kids to succeed – in school and in the 21st-century workplace. They must understand computers, technology applications, and media production tools that have an increasingly influential role in their lives. Just as importantly, when kids know how to use these tools, the best elements of technology and media can be integrated into their core curriculum and used to improve their schools and other learning environments.

Deepen young people's communication and collaboration skills. The increasingly mobile digital media world offers an explosion of ways for kids to connect, communicate, and work together. They have opportunities to engage with others in their schools, communities, and around the world. Kids must learn new rules of proper communication and collaboration if they are to convey and absorb ideas in a responsible, effective, and pro-social manner.

Encourage creativity and innovation. Digital media and technology tools offer powerful ways to design and create media and user-generated content. In our rapidly changing world, all kids must be able to understand and employ ever more powerful tools – and apply them in creative new ways. This creativity should be encouraged, along with a clear understanding of the differences between creating, altering, and borrowing.

2

Disseminate a basic Digital Literacy and Citizenship curriculum to all schools

In addition to teaching kids the 21st-century skills of creation, communication, connection, and collaboration, we must instruct them in the essentials of Digital Literacy and Citizenship so that they will conduct themselves in ways that protect privacy, recognize authorship, and maintain high ethical standards.

Curriculum tools and resources – not a mandated national curriculum – will help schools teach kids to appreciate their responsibility for their content and their actions and to develop and practice safe, legal, and responsible behaviors for the digital world.

3

Provide teacher training in the basics of Digital Literacy and Citizenship

Teachers across the country need training and preparation in the fundamentals of Digital Literacy and Citizenship. Many of today's teachers and administrators lag behind their students in understanding and using technology and digital media. Teachers must understand the basic technologies and applications, as well as what their students are doing with them, if they are to teach 21st-century skills and ethics successfully.

Teachers also need professional development and guidance about how to connect formal learning environments (schools) with informal learning environments (after-school programs, libraries, homes) as digital media and technology continue to break down the walls between the two.

4

Educate parents about digital technologies, use, and ethics

A parent's job is to protect and guide. Parents desperately need to understand not only the technologies that inform their children's lives, but also the issues around behavior and responsible use. Rather than seek only legislative protections in a world that is constantly developing, the first course of action should be to give parents the information and tools they need to teach their children about responsible, safe, and ethical behavior in the digital world.

Developing Digital Literacy and Citizenship Programs. **There are several necessary steps to develop Digital Literacy and Citizenship programs for every child in America:**

1

Fund professional development for educators

- Create a national Digital Teacher Corps – along the lines of AmeriCorps and Teach for America – for on-site educator training. This organization would provide professional development and in-service training for educators to improve their facility with technology and media, and with basic tenets of digital learning.
- Provide professional development and support through existing structures, including state Departments of Education and community college and university systems.

2

Create basic resources for educating teachers, parents, and kids

Curriculum resources and tools for Digital Literacy and Citizenship are being developed by Common Sense Media and other education groups. These tools must reflect the constant changes of the media world. Digital Literacy and Citizenship cannot be taught with textbooks that are outdated before they are published. These issues must be presented through the Internet and other digital media, on flexible platforms that can be regularly redefined with new information and experiences. In addition, Digital Literacy and Citizenship programs must be modular and scalable – not entirely new subjects, but lessons and ideas that can be incorporated into existing curricula at each age and grade level.

Finally, curriculum and educational resources for teachers, students, and parents should be disseminated through the schools, as well as community programs (e.g. Boys and Girls Clubs), after-school activities, and parent engagement networks (e.g. PTAs).

3

Fund and deliver education / technology resources in under-served schools and communities

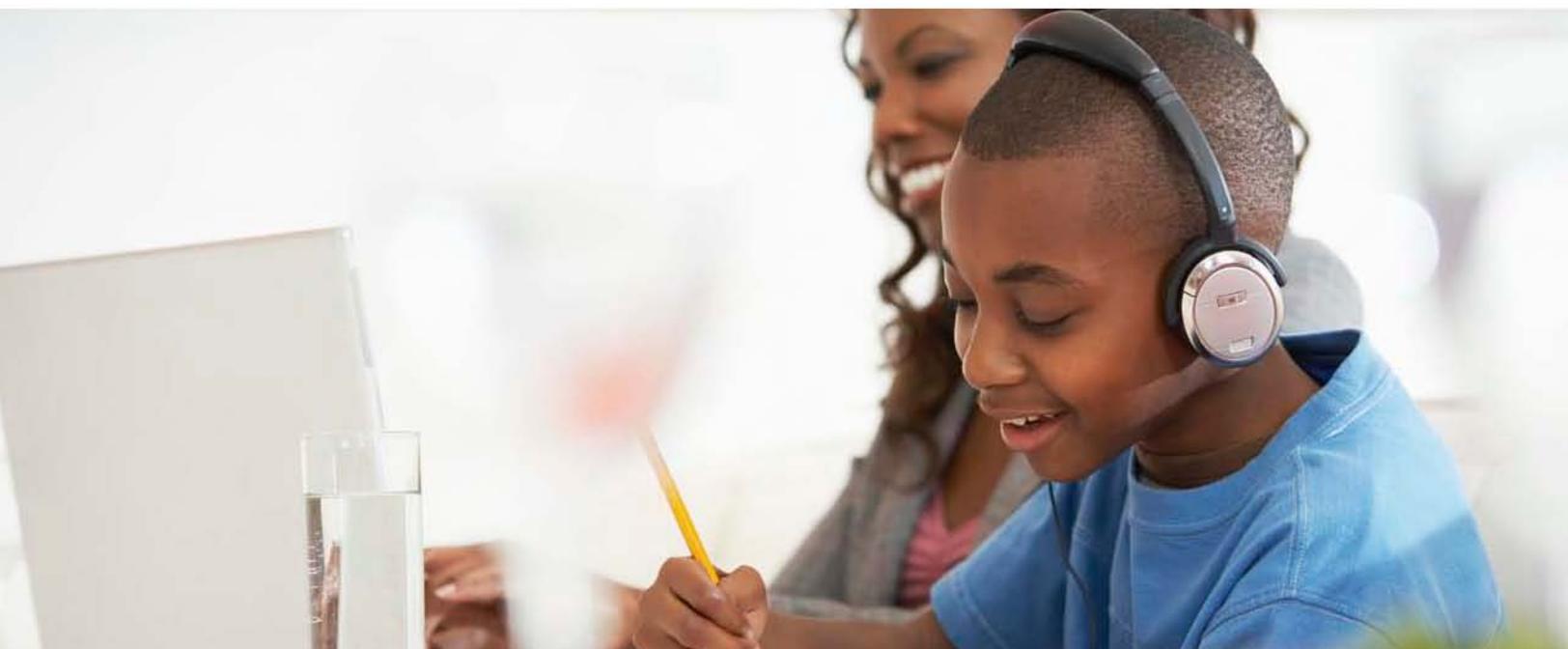
- Fund and train technology support and staff development for under-served districts to ensure that digital media and technology are fully integrated into the neediest schools.
- Fund and hire a national corps of technology support specialists.
- Continue to upgrade and / or retool school facilities and equipment.
- Coordinate efforts with other related legislation and funding.

4

Make media education and Digital Literacy an essential part of every school's basic curriculum

Digital Literacy and Citizenship are ideas and concepts that should be incorporated into existing courses – including English, math, science, and history – at each age and grade level in all K-12 schools in the United States. We must ensure that kids learn rules for safe and smart use of digital media in order to make the most of the educational opportunities that digital media creates.

What do we get if we do this? It is perfectly clear: The nation whose children best harness the educational and creative powers of digital media will write the economic and educational success story of the 21st century. Digital media is bringing significant changes to the ways that kids live and learn – and those changes can create opportunities or pose potential dangers. We need to fund teachers, curricula, and parenting tools that teach kids to understand and manage media’s role in their lives. The emerging fields of Digital Literacy and Citizenship are the keys to that preparation. They deserve America’s investment and leadership today.



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Common Sense Media is the nation's leading nonpartisan organization dedicated to improving the media and entertainment lives of kids and families. Go to www.commonsensemedia.org for thousands of reviews and expert advice.

