

COALITION FOR INDEPENDENT RATINGS



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www.independentratings.org

July 10, 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 and MB Docket No. 09-26

Dear Ms. Dortch:

On July 9, 2009, Dominic Perri, Executive Director of the Coalition for Independent Rating Services (“Coalition”) met with Robert Radcliffe, Eloise Gore, Mary Beth Murphy, Holly Saurer, Alison Greenwald Neplokh, Kim Matthews, Jeffrey Neumann, Stacy Katz, Delara Derakhshani and Kiersten Kamman of the Media Bureau. The Coalition represents independent ratings providers whose mission is to educate the public on the benefit of media content advisories that are developed independent of content producers.

The Coalition believes in the creation of a marketplace of ratings systems in which consumers can choose the system that best suits their needs. The challenge is to provide access to the many TV ratings now in existence. Parents not only need choices but they also should have access to those choices at key decision-making moments.

While there are a dozen TV ratings systems, broadcast TV viewers only have the option of using the often maligned 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. In fact, the current situation in which broadcast TV viewers can only use

the TV Parental Guidelines system to block programming with their V-Chip actually functions as a de facto mandated system.

Need for test of Broadcaster's ability to transmit new ratings

The Coalition noted that, in light of the Commission's report due to Congress on August 29 regarding available technologies for rating, blocking and filtering media content¹, it is concerned 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 stream². If such a test is not conducted, the Commission could face an insurmountable legacy problem in the coming years

The Coalition requested the Commission make a public statement encouraging broadcasters to test their capacity to provide additional ratings for broadcast television. A public statement by the Commission would communicate to broadcasters the importance of such a test and the value of the test results for the Commission's August 29 report to Congress.

The results should provide the Commission with verifiable data for their upcoming report to Congress, and enable those interested in improvements to the parental control network by providing solid evidence the improvements anticipated by the Commission can be accomplished without major disruption. The Coalition stands ready to work with the Commission and interested broadcasters to facilitate this important first step.

Sincerely,



Dominic J. Perri
Executive Director
Coalition for Independent Ratings Services

¹ As required in the Children's Safe Viewing Act.

² 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 information (*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)

cc: Robert Radcliffe
Mary Beth Murphy
Eloise Gore
Holly Saurer
Alison Greenwald Neplokh
Kim Matthews
Jeffrey Neumann
Stacy Katz
Delara Derakhshani
Kiersten Kamman

Rating Region Table (0x05) Values

- Notes:** 1) The Content Advisory Descriptor (CAD) may include rating_values from RRT 0x01 (per CEA-766) as well as RRT 0x05 and any additional RRTs as required.
 2) All text strings should be identified as English (ISO_639_language_code= 0x656E67)

<u>Parameter</u>	<u>Value</u>
rating_region:	0x05
version_number:	0
rating_region_name_text:	"Additional US Ratings"
dimensions_defined:	0x04

Dimension:		0	1	2	3
dimension_name_text:		"E/I Ratings"	"Substance Abuse"	"Tobacco Use"	"Spanish Ratings"
graduated_scale:		(graduated = "0")	(graduated = "1")	(graduated = "0")	(graduated = "1")
L E V E L	[0] abbrev_text:	null	null	null	null
	value_text:	null	null	null	null
	[1] abbrev_text:	"E/I"	"AA"	"TU"	"AA"
	value_text:	"E/I"	"Alcohol Abuse"	"Tobacco Use"	"Under 7"
	[2] abbrev_text:	"non-E/I"	"DA"		"A"
	value_text:	"non-E/I"	"Drug Abuse"		"Appropriate"
	[3] abbrev_text:				"B"
	value_text:				"Over 12"
[4] abbrev_text:				"B-15"	
value_text:				"Over 15"	
[5] abbrev_text:				"C"	
value_text:				"Over 18"	
[6] abbrev_text:				"D"	
value_text:				"Adult Only"	