

December 3, 2009

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12 St., SW  
Washington, DC 20554

Re: In the Matter of Empowering Parents and Protecting Children in an Evolving Media Landscape, MB Docket No. 09-194, October 23, 2009

Dear Ms. Dortch:

This comment is in response to the Federal Communications Commission's (FCC) request for input on Empowering Parents and Protecting Children in an Evolving Media Landscape. We are graduate students of Northwestern University in Evanston, Illinois, pursuing a Master of Science in Communication. As part of our coursework in E-Business Law and Strategy this quarter, our class examined this all-important issue and we are pleased to have an opportunity to present our perspective and recommendations to the FCC for consideration.

Media, particularly the Internet, has made the world borderless. Individuals can obtain on-demand information and education by instantaneously connecting with other individuals around the globe. Adults who have not grown up with such technologically savvy tools should, understandably, feel compelled to fully realize the benefits and repercussions when providing their children with access to these new tools.

In 1899, Charles Duell, Commissioner of the United States Patent Office, remarked: "Everything that can be invented - has already been invented." It is hard not to find the humor in this statement more than 100 years later. Ten years ago the iPod was only a vision by Apple. What will the next "big thing" be in 2020? More importantly, how will this shape our children's world and what should we be doing today to promote safe use and equal access to our nation's children?

With technology molding and reshaping our world each day, we urge the FCC to thoughtfully consider the studies, research, and personal insight we outline in this comment.

## **WHAT WE KNOW**

### **A Fundamental First Amendment Right**

The First Amendment's Free Speech Clauses serve several interests, among them encouraging the free flow of information within what is frequently referred to as the "marketplace of ideas."<sup>1</sup> But while information is available, the marketplace of ideas is not open to individuals who do not have access to advanced (though increasingly becoming commonplace) educational tools like the Internet and interactive media. As the world around us becomes more computerized and technologically advanced, individuals without access will be denied the ability to fully realize their First Amendment right to participate in the availability and exchange of ideas through ever-evolving media forms. The impacts are

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<sup>1</sup> Internet Commerce – The Emerging Legal Framework, Second Edition, Margaret Jane Radin, John A. Rothchild, R. Anthony Reese, Gregory M. Silverman

far-reaching as policy, culture, and more will be shaped by those who have access to these media forms while leaving the voices and ideas of those without access silenced.

### **Television and Internet Regulations Designed to Protect Children**

We commend the regulations put forth through the years to protect children in an evolving media landscape. The Children's Television Act of 1990 was a pivotal policy that shaped television viewership potential for children to ensure access to educational content for this population. The enactment of the Children's Online Privacy Protection Act (COPPA) in 1998 sent a strong message as the Internet began to rise in popularity by implementing standards when procuring children's personal information online. More recently in 2004 and 2005 the Commission has continued to strengthen and secure a pathway to safe, educational television by requiring an "E/I" (educational and informative) symbol to simplify a parent's role to identify appropriate material for their children to watch.

### **BENEFITS OF EMBRACING THE EVOLVING THE MEDIA LANDSCAPE**

#### **Enhances Educational Achievement (Especially Providing an Early Start)**

There are numerous educational benefits and potential gains to children who are technology- and new-media literate; benefits which are more evident when children are introduced to media and technology at an early age. This was re-affirmed by one of our colleagues who has a five-year-old who watches educational children's programs on Noggin, PBS Sprout and Playhouse Disney channels: "I can't tell you the number of times that my daughter has expressed something that I thought was advanced for her age and when I asked where she learned it, her reply has often been: 'On my TV program'."<sup>2</sup>

Children Now, a children advocacy organization that provides literature on the positive effects of media on preschoolers points to studies that show that pre-school age children who regularly view educational programming increase their readiness for kindergarten and have superior high school grades in English, science and math. Another study showed that children ages two to four from low- and moderate-income families, who watched Sesame Street and other educational programs, performed better on vocabulary, school readiness, pre-reading and math tests than non-viewers as long as three years later.<sup>3</sup>

#### **Encourages Cultural Sensitivity and Foreign Language Learning**

Media that incorporates foreign languages exposes children to diverse cultures and encourages English-speaking children to learn a new language earlier than when traditional public education institutions' foreign language programs kick in (grades 6-8 or later in high school). Studies show that a relationship exists between age and the rate of learning a new language.<sup>4</sup> Some television programs for pre-kindergarten through the first grade students provide non-English learning opportunities; these programs include: Dora the Explorer (Spanish), and Handy Manny (Spanish) and Ni Hao, Kai-lan (Chinese). Language teachers can integrate these programs in classrooms to boost young students' interest in learning a foreign language. As the parent of a five-year-old, one of our colleagues reports that she has observed how watching these programs serve to reinforce new languages with her own child as well as her child's friends of the same age.<sup>5</sup>

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<sup>2</sup> Yvonne Turnbull, Master of Science in Communication candidate, Northwestern University, and parent of a five-year-old, 2009

<sup>3</sup> Children Now: Children & the Media, Winter 2006

<sup>4</sup> Children Now: Children & the Media, Winter 2006

<sup>5</sup> Yvonne Turnbull, Master of Science in Communication candidate, Northwestern University, and parent of a five-year-old

In the United States today, one-in-five children grows up in an immigrant, non-English-speaking family.<sup>6</sup> Programs that promote foreign language skills as well as provide English translations to help English learners improve their language skills will aid in the removal of language barriers for a large portion of our population.

Additionally, as children's experiences are undoubtedly shaped by their immediate community, many are consequently uninformed of racial and ethnic groups outside of their communities. Educational media that show diverse groups naturally interacting amicably can be used as a tool to teach diversity and tolerance.

### **Promotes Pro-Social Behavior, Augments Collaboration and Provides New Learning Platforms**

"Pro-social" programming has been broadly defined as shows that yield positive social outcomes, such as friendly interactions, imagination and library use, or episodes that explore themes such as altruism, empathy and feelings. Other researchers prefer to categorize pro-social lessons as teaching intra-personal skills (self-esteem, self-acceptance and adjusting to life change) and inter-personal skills (cooperation, friendship and competition). Educational and informational (E/I) programming has been found to have positive effects on children's social development. A recent meta-analysis of studies on the effects of E/I programming found a positive relationship between children who watched pro-social programming and children who exhibited pro-social behavior. The analysis suggested that the addition of guided lessons, games and discussion materials "significantly strengthened" pro-social behaviors, such as a cooperation and honesty, among child viewers.<sup>7</sup>

For some children, positive lessons come from home. For many at-risk children, in the absence of supportive parental figures, positive lessons can come from positive media. Exposing children to a world outside of their current state expands their imaginations and opens their minds to possibilities, alternatives, and hope.

Furthermore, first and second graders who watched Sesame Street before starting school were more capable of reading on their own and "less likely" to be receiving "special help" for reading problems than children who did not watch such educational programming. Children who viewed these educational programs were also found to devote more time to reading and other educational activities when away from television and participated more in the classroom than less frequent viewers.<sup>8</sup>

With features such as interactive program guides, Internet services and enhanced audio and visual quality, digital television offers viewers a richer television experience than ever before. This new technology comes at a time when children of all ages are heavy media consumers. Research has found that interactive components in technology have the potential to increase children's ability to learn collaboratively by communicating with peers to solve a problem. Interactive games have been found to be effective learning tools, helping to increase cognitive skills such as spatial imagery and multi-tasking. Digital programming has been shown to enhance reading, writing, creativity and problem-solving.<sup>9</sup>

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<sup>6</sup> Children Now: Children & the Media, Winter 2006

<sup>7</sup> Children Now: Children & the Media, Winter 2006

<sup>8</sup> Children Now: Children & the Media, Winter 2006

<sup>9</sup> Children Now: Digital Television: Sharpening the Focus on Children, Spring 2004

Children Now reports that, WGH-TV a PBS affiliate in Boston, produced an interactive prototype episode of *Arthur*, the Emmy Award-winning children's program that promotes reading, writing, creativity and problem-solving to show teachers and broadcasters what is possible with digital technology. Using digital technology, children with disabilities can also participate in the program as it offers sign language for deaf children and audio descriptions for blind and visually impaired children. Partnering with Intel, PBS also created an interactive digital version of *Zoboomafoo* (PBS), a children's wildlife show.

While they are often regarded as mind-numbing toys, studies have emerged that point to the benefits video games provide children in learning 21<sup>st</sup> century skills in literacy as well as problem-solving. A recent study found that video games allow teachers to tap into their students' existing enthusiasm for digital games to engage, expand, and empower them as learners (Thai, Lowenstein, Ching & Rejeski, 2009).<sup>10</sup>

According to one of our colleagues<sup>11</sup>, in preparing their then four-year-old daughter for testing into the Chicago Public Schools (CPS) gifted program, her husband used online tools, such as the UpToTen.com Web site. Their daughter scored high on the test and is now in kindergarten in the CPS gifted program. UpToTen.com offers over 1,000 age-appropriate educational games for children up to age ten that promote early learning and building independence.<sup>12</sup> The site has a security feature that prevents children from going to additional sites once a parent logs them in.

Schools today also have the opportunity to take advantage of mobile devices to facilitate learning. In a recent report on innovative projects that are encouraging the use of mobile learning in the United States and around the globe entitled, "Pockets of Potential," Carly Shuler (2009) explains that research in learning sciences suggests that situated learning is especially effective when information is available "just in time (when learners are able to apply it) and on demand (when learners know they need it and want it)." A field trip to the park becomes a more valuable learning experience if students can access information about an unusually patterned butterfly on their handheld devices, compare it with other familiar butterflies, track the location of the other butterfly types through software programs such as Google Earth, decide if they have discovered something new, and share their discoveries with other networked users. If contemporary children must wait a day or even an hour for information, they will likely lose interest and fail to incorporate new information into existing cognitive structures. The immediacy of networked technologies allows teachers to respond to the needs of learners when they are ready to learn (Shuler, 2009).<sup>13</sup>

### **Protects Children from Falling Victim to the Digital Divide**

In an address to Joint Session of Congress, February 24, 2009, President Barack Obama remarked, "Our nation's economic competitiveness depends on providing every child with an education that will enable them to compete in a global economy that is predicated on knowledge and innovation."<sup>14</sup>

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<sup>10</sup> The Digital Promise: Transforming Learning with Innovative Uses of Technology, Jeanne Wellings and Michael H. Levine, Joan Ganz Cooney Center at Sesame Workshop

<sup>11</sup> Yvonne Turnbull, Master of Science in Communication candidate, Northwestern University, and parent of a five-year-old, 2009

<sup>12</sup> www.UptoTen.com

<sup>13</sup> The Digital Promise: Transforming Learning with Innovative Uses of Technology, Jeanne Wellings and Michael H. Levine, Joan Ganz Cooney Center at Sesame Workshop

<sup>14</sup> President Barack Obama. Address to Joint Session of Congress. February 24, 2009.

Between 1967 and 1997 the United States has realized a substantial shift in the job market with manufacturing jobs dominating the workforce in 1967 and information services taking over in 1997.<sup>15</sup> Today, more than 80% of jobs are found in the information services sector.<sup>16</sup> While core knowledge in math, science, and reading among other subjects will remain essential to a child's development, to be marketable for 21<sup>st</sup> century jobs, children must have access to the media conduits that are shaping the world around them.

As computers continue to serve as the hardware shaping a participatory culture and delivering on-demand entertainment and education, many children are being left behind. Of children living in low-income households, only 54% have a computer in the home compared with the 95% of children who have a computer in households with an income of \$75,000 or more.<sup>17</sup> Further, 63% of high-income families with children have broadband access while only 33% of low-income families with children have broadband access.<sup>18</sup> Students invariably have a difficult time bridging the digital divide because of their socioeconomic status and lack of access to technology. As technology continues to shape the world around them and as tasks become more and more computerized, a lack of access furthers this divide and impairs the ability of these students to compete in education, in the job market, and generally reduces their outlook for success in the world.

Between our collective experiences in various jobs, we can confirm that our media literacy skills provided a foundation for all the post-collegiate roles we have assumed. From our experience, basic technology literacy skills are not skills that employers today teach you; applicants who hope to land a job in this competitive environment are expected to be able to navigate basic computing tools, software, programs, and the Internet on day one. However, an even more immediate need for children is the relevance of these skills in college. Today, a computer laptop in the classroom is as essential as a textbook was ten years ago. It is commonplace to use your computer in class to do Internet searches to supplement discussions and to use as a research tool.

By moving forward with a laissez-faire approach to integrating technology into children's lives, we risk children unnecessarily falling behind in acquiring 21<sup>st</sup> century skills. To combat this, the Chicago Public Schools have put forward a number of initiatives including establishing the Chicago Virtual Charter School (CVCS). Students are provided an integrated approach to learning including a traditional classroom-style education with individualized, virtual learning that they move through at their own pace. Students are able to master core concepts for their grade level while advancing their learning in technological concepts needed for success in the 21<sup>st</sup> century and their futures.<sup>19</sup> As students harbor their own unique learning style that traditional classroom learning can frequently ignore, the CVCS curriculum can tend to each child's needs in a non-judgmental, safe environment. Students need not worry about the emotional stakes of raising their hands to ask a question or needlessly worry about whether they will be judged by the other 30 students in the classroom; they simply need to send an instant message to their teach to ask a question.

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<sup>15</sup> Partnership for 21<sup>st</sup> Century Skills, 21st Century Skills, Education & Competitiveness, A Resource and Policy Guide (Tucson, AZ., Partnership for 21<sup>st</sup> Century Skills, 2008), p. 2.

<sup>16</sup> Partnership for 21<sup>st</sup> Century Skills, Transition Brief Policy Recommendations on Preparing Americans for the Global Skills Race (Tucson, AZ., Partnership for 21<sup>st</sup> Century Skills, 2008), p. 2.

<sup>17</sup> Kaiser Family Foundation, *Electronic Media in the Lives of infants, Toddlers, Preschoolers and their Parents* (Menlo Park, CA., Kaiser Family Foundation, 2006) p. 29.

<sup>18</sup> Connected Nation, Consumer Insights to America's Broadband Challenge: A Research Series from Connected Nation, Inc. (Washington, D.C., Connected Nation, October 13, 2008), p. 6.

<sup>19</sup> Chicago Virtual Charter School, [www.k12.com/cvcs](http://www.k12.com/cvcs).

The CVCS curriculum is tailored to individuals so children can also learn at their own pace moving more slowly or quickly through lessons and even grade levels. For example, students can work on two unique subjects at different grade levels depending on their ability and areas where they need improvement.

Parents whose children participate in the program have provided positive feedback. Here is an example:

*This is Sarah Koss' first year at the school, and the 3rd grader's mother is already pleased. Teachers at Sarah's former school passed her without making sure she was learning, said Michelle Koss, 36, who said Sarah has a learning disability.*

*"I love it," said Michelle Koss, who lives on the southwest side [one of Chicago's lower-income neighborhoods]. "Here she can work slower. It takes her two days to learn something that it would take a traditional student one day. She can finally learn at her own pace."<sup>20</sup>*

A recent paper on digital media and learning by the MacArthur Foundation charges that the "participatory culture is reworking the rules by which school, cultural expression, civic life, and work operate."<sup>21</sup> Our future workforce will inevitably be molded by the evolving media landscape. It will serve the commission, parents, teachers, and employers alike to take action against a growing participation gap amongst students' technological literacy to help position our children as tomorrow's leaders.

While the benefits of the evolving media are evident from the discussion provided above, there are also inherent risks. Below, we examine some of the more prevalent risks and how they can be addressed.

## **RISKS OF THE EVOLVING MEDIA LANDSCAPE**

### **Potential Risks to Children Resulting from Online Exposure**

The generation born today will not know a world without computers, electronic media and the Internet. While abundant benefits of providing children with an online experience are well-documented, there are also several risks associated with exposing children to an online environment. How do we ensure children are technologically adept without exposing them to the dangers lurking behind the computer screen?<sup>22</sup> Society is still attempting to address this issue.

### **Behavioral Risks**

Soledad Liliana Escobar-Chaves and Craig A. Anderson state the following, in their article, "Media and Risky Behaviors:

"As children enter adolescence, many begin to engage in risky health behaviors. The U.S. Centers for Disease Control and Prevention (CDC) has identified six critical types of adolescent health risk behaviors - physical inactivity, poor eating habits,

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<sup>20</sup> Ahmedullah, N. *Online charter school rings bell with parents, students*. Chicago Tribune. April 8, 2009.

<sup>21</sup> MacArthur Foundation, *Confronting the Challenges of Participatory Culture: Media Education for the 21st Century* (Chicago, IL., The John D. and Catherine T. MacArthur Foundation) p. 9.

<sup>22</sup> Ilene R. Berson, Michael J. Berson, and John M. Ferron, *Emerging Risks of Violence in the Digital Age. Lessons for Educators from an Outline Study of Adolescent Girls in the United States*. Meridian.

smoking, alcohol use, sexual behaviors, and violence - that contribute to the leading causes of death and disability in the United States among adults and youth.”<sup>23</sup>

Today’s evolving electronic media have become conduits that not only expose children to these risky behaviors, but particularly in the case of the Internet, provides a venue where they can easily conduct such behavior without the knowledge of their parents.

### **An Increased Risk for Smoking and Obesity**

The majority of new smokers are children and adolescents; next to the influence of peers, advertising is probably among the main external factors that can influence the initiation of smoking in adolescents. As a result, children and adolescents who are avid viewers or users of electronic media are increasingly exposed to promotional messages for tobacco products.<sup>24</sup>

According the Centers for Disease Control and Prevention, sedentary behavior is among the leading causes for overweight and obese children.

“Children spend a considerable amount of time with media. One study found that time spent watching TV, videos, DVDs, and movies averaged slightly over 3 hours per day among children aged 8–18 years. Several studies have found a positive association between the time spent viewing television and increased prevalence of obesity in children. Media use, and specifically television viewing, may:

- Displace time children spent in physical activities,
- Contribute to increased energy consumption through excessive snacking and eating meals in front of the TV,
- Influence children to make unhealthy food choices through exposure to food advertisements, and
- Lower children's metabolic rate.”<sup>25</sup>

Based on the content of certain television and Internet advertisements, it is clear that children are the target audience. We believe further research is required to determine whether there is a direct correlation between the rise in electronic media and the rise in obesity.

The recent appearance of Advergames on the electronic media scene may be a contributing factor to the food choices children make. These Internet-based games include a commercial message, either subtle or overt, that can be found on product or brand Web sites.<sup>26</sup> Now Advergames are cropping up on Web sites for popular children's TV channels advertising foods marketed almost exclusively to children and adolescents.<sup>27</sup>

### **An Increased Risk for Promiscuous, Violent and Aggressive Behavior**

The link between exposure to sex in the media and earlier onset of sexual intercourse has been supported by several studies conducted in this area.<sup>28</sup> According to Victor C. Strasburger:

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<sup>23</sup> Media and Risky Behaviors. Soledad Liliana Escobar-Chaves and Craig A. Anderson [www.futureofchildren.org](http://www.futureofchildren.org)

<sup>24</sup> Media and Risky Behaviors. Soledad Liliana Escobar-Chaves and Craig A. Anderson [www.futureofchildren.org](http://www.futureofchildren.org)

<sup>25</sup> [www.cdc.gov](http://www.cdc.gov)

<sup>26</sup> Media and Risky Behaviors. Soledad Liliana Escobar-Chaves and Craig A. Anderson [www.futureofchildren.org](http://www.futureofchildren.org)

<sup>27</sup> Media and Risky Behaviors. Soledad Liliana Escobar-Chaves and Craig A. Anderson [www.futureofchildren.org](http://www.futureofchildren.org)

<sup>28</sup> Brown JD, Strasburger VC. From Calvin Klein to Paris Hilton and MySpace: adolescents, sex & the media. *Adolesc Med State Art Rev.* 2007; 18(3): 484-507.

"The media represent an important access point for birth control information for youth; however, the major networks continue to balk at airing contraception advertisements at the same time they are airing unprecedented amounts of sexual situations and innuendoes in their prime-time programs."<sup>29</sup>

Exposure to violent media has been acknowledged as a risk factor for aggressive and violent behavior for decades.<sup>30</sup> More recent studies have supported the link between violent media and violent and aggressive behavior, but there are still gaps in the documentation. The specific role exposure to violent media plays in influencing violent and other serious anti-social behavior has not been as thoroughly researched as necessary to implement change to prevent such adverse effects of electronic media. A study published in the *Journal of Youth Adolescence* cited the following among the potential negative results of violent media exposure: delinquent behavior and conduct problems, serious physical aggression, trait aggressiveness and general aggressiveness, callous-unemotional traits, poor academic skills, and psychopathology.<sup>31</sup> Through analysis of the results of recent studies in this area, it is apparent that media violence exposure has a larger effect on later violent behavior than other contributing factors including: substance use, abusive parents, poverty, living in a broken home, or having low IQ.<sup>32</sup> Given these findings, we believe it is important to focus further research in this area in an effort to address how to prevent these negative outcomes.

In spite of the foregoing, Soledad Liliana Escobar-Chaves and Craig A. Anderson also point to how electronic media can be used to counteract risks, in their article, *Media and Risky Behaviors*:

"What may be part of the problem could instead become part of the solution. As noted by Douglas Evans in his article in this volume, electronic media have been used in positive ways, leading to positive health behavior outcomes. Therefore, channeling creative energy into positive mass media content could well help to reduce the health risk behavior rates, particularly among adolescents. A thorough understanding of the nature of the media impact on health and well-being is a vital component of the public health agenda in the United States."<sup>33</sup>

### **Privacy, Predators and Protection**

A number of protective measures have been put in place in order to limit the amount of data collected on/from minors. One of the first attempts at self-regulation to ensure a child's online privacy was implemented in 1997. The Council of Better Business Bureaus' Children's Advertising Review Unit ("CARU") amended its online marketing guidelines on

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<sup>29</sup> Strasburger, Victor C., Media and Children: What Needs to Happen Now? *JAMA*. 2009;301(21):2265-2266 (doi:10.1001/jama.2009.572) <http://jama.ama-assn.org/cgi/content/full/301/21/2265>

<sup>30</sup> *Journal of Youth and Adolescence* Springer Netherlands ISSN0047-2891 (Print) 1573-6601 (Online) [Volume 38, Number 3 / March, 2009](#) Empirical Research DOI10.1007/s10964-008-9335-2 Pages 417-428 [Behavioral Science](#) Tuesday, September 09, 2008

<sup>31</sup> *Journal of Youth and Adolescence* Springer Netherlands ISSN0047-2891 (Print) 1573-6601 (Online) [Volume 38, Number 3 / March, 2009](#) Empirical Research DOI10.1007/s10964-008-9335-2 Pages 417-428 [Behavioral Science](#) Tuesday, September 09, 2008

<sup>32</sup> Huesmann and others, "Longitudinal Relations between Children's Exposure to TV Violence and Their Aggressive and Violent Behavior in Young Adulthood: 1977-1992," *Developmental Psychology* 39, no. 2 (2003): 201-21; Anderson, Gentile, and Buckley, *Violent Video Game Effects on Children and Adolescents: Theory, Research, and Public Policy* (New York: Oxford University Press, 2007). See chapter 2 for more detailed discussions of these methodological issues. Office of the Surgeon General, "Youth Violence: A Report of the Surgeon General," 2004. Available from [www.surgeongeneral.gov/library/youthviolence/toc.html](http://www.surgeongeneral.gov/library/youthviolence/toc.html)

<sup>33</sup> *Media and Risky Behaviors*. Soledad Liliana Escobar-Chaves and Craig A. Anderson [www.futureofchildren.org](http://www.futureofchildren.org)

data collection and parental consent.<sup>34</sup> The results were deemed not adequate and in response, the government enacted COPPA.<sup>35</sup> However, despite governmental and self-regulatory efforts, there has been an explosion of threats to children who are Internet users, and as they become ever more technologically proficient, they sometimes venture into dangerous online territory.

In the past decade, concerns have shifted from focusing on content (pornography, etc) to more interactive dangers including cyber-bullying, harassment and data privacy.<sup>36</sup> Calls for regulatory rules and data requirements for businesses operating online have never been louder.<sup>37</sup> Will these be enough, or are there other ways to address these concerns?<sup>38</sup> Adam Thierer, President of the Progress and Freedom Foundation, argues that real-world involvement by parents and others closer to the child will be more effective than government regulations alone.

One of the biggest concerns about online exposure is the threat of predators. While a few highly publicized cases can strike fear into many a parent's heart, the reality is much different.<sup>39</sup> No predator can "jump through" a screen and grab a child using the computer.<sup>40</sup> According to Internet safety expert Larry Magid:

"Contrary to what some people might imply, most kids who become victims of online sex predators are not abducted. They are lured after being groomed by their predators. And, though any case is tragic, the fact is that such crimes are relatively rare considering the millions of children and teens that go online every day. Despite thousands of arrests of would-be predators caught up in sting operations, tragic cases like this don't appear to occur very often."<sup>41</sup>

The problems associated with child abuse in an online environment need real world action. The vast majority of child predators are acquaintances, not strangers lurking in dark corners. Thierer argues that while possibly effective against stranger harassment, government protections such as age verification would be ineffective against the larger problem of acquaintance abuse.<sup>42</sup>

### **Professional Awareness and Response on Risks to Children**

Teachers, parents and other adults are finding themselves in a new position. Teaching technology, while ensuring proper use, requires skills that are new to many adults.<sup>43</sup>

FCC Commissioner Jonathan Adelstein argued in 2007 that:

"Parents across the country are locked in a near constant struggle to protect our children from a barrage of media programming filled with content they consider

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<sup>34</sup> Internet Commerce – The Emerging Legal Framework, Second Edition, Margaret Jane Radin, John A. Rothchild, R. Anthony Reese, Gregory M. Silverman

<sup>35</sup> Margaret Jane Radin, John A. Rothchild, R. Anthony Reese, and Gregory M. Silverman, Internet Commerce: The Emerging Legal Framework, Second Edition.

<sup>36</sup> Adam Thierer, *Five Online Safety Task Forces Agree: Education, Empowerment & Self-Regulation Are the Answer*, [www.pff.org](http://www.pff.org)

<sup>37</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>38</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>39</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>40</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>41</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>42</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>43</sup> Joyce Valenza, *14 Ways K-12 Librarians Can Teach Social Media*, The American Education Corporation, Tech and Learning

inappropriate. Too many parents feel like they are losing control, and they are frustrated by a relentless march of coarse material they view as too violent, too sexual, too commercial or too unhealthy for their children.”<sup>44</sup>

How do parents, teachers and other educators combat the constant information stream and ensure children are protected from overexposure, while guiding them to develop the critical technological skills needed for a successful future?

If the adage about teaching a child about the dangers of a pool and teaching them to swim is safer than locks and fences<sup>45</sup>, then how do parents and teachers guide children through the online environment? Media literacy should be, but is not, routinely taught as part of elementary school through college.<sup>46</sup> According to Michael Kaiser, Executive Director of the National Cyber Security alliance:

“The majority of K-12 schools across the country, including many in California, comprehensive cyber-education is not part of the curriculum. Today, just five states have mandated Internet safety be taught to K-12 students. Only 25 percent of educators, surveyed for a recent National Cyber Security Alliance study, felt prepared to teach basic online safety and security principles.”<sup>47</sup>

Various education organizations have recently provided tools to help educators share the information and tools needed to guide tomorrow’s leaders today. Even librarians have constructed guidelines on how to encourage proper student use of Internet technology.<sup>48</sup> Lessons can be taught starting at a very young age. If risk avoidance and appropriate safety lessons are incorporated into everyday education, children can be aware of the dangers lurking online and respond safely.<sup>49</sup> The state of Virginia published a 2005 report titled “Guidelines and Resources for Internet Safety in Schools,” which outlines several steps about how students are allowed to download content and use the Internet in appropriate and safe ways.<sup>50</sup>

Parents can also lead the effort against the risks of exposing children to improper content in the digital universe. Efforts should start early. A study from the University of Washington points out that the earlier a child becomes accustomed to watching TV, the harder it may become for a parent to “take it away” as the child grows older.<sup>51</sup> Can the same be said for computer use as well?

Government at all levels has passed several laws to help protect children. Another potential government action is to spearhead a public awareness campaign. Several past campaigns have been successful, including: Forest Fire Prevention and Anti-Littering and Land Stewardship.<sup>52</sup> The Government should broaden its effort from simply providing legislative answers and look to partner with parents and educators to enact “community outreach”

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<sup>44</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>45</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>46</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>47</sup> Adam Thierer, Parental Controls and Online Child Protection, [www.pff.org](http://www.pff.org)

<sup>48</sup> Joyce Valenza, *14 Ways K-12 Librarians Can Teach Social Media*, The American Education Corporation, Tech and Learning

<sup>49</sup> Adam Thierer, *Parental Controls and Online Child Protection*, [www.pff.org](http://www.pff.org)

<sup>50</sup> Adam Thierer, *Parental Controls and Online Child Protection*, [www.pff.org](http://www.pff.org)

<sup>51</sup> Dimitri A. Christakis and Frederick J Zimmerman, *Young Children and Media: Limitations of Current Knowledge and Future Directions for Research*. American Behavioral Scientist 2009; 52; 1177. DOI: 10.1177/0002764209331540

<sup>52</sup> Adam Thierer, *Parental Controls and Online Child Protection*, [www.pff.org](http://www.pff.org)

programs in an effort to successfully combat the dangers that children can fall victim to online.

## **CONSIDERATIONS AND RECOMMENDATIONS FOR FURTHER STUDIES**

### **Reach Out to the Business Sector**

Today, many organizations that provide competing services emphasize that the strength of their brand is based on the expertise of professionals at all levels of their organizations. It therefore behooves business leaders who will depend on today's children to serve as the future talent to lead their organizations to a successful and sustainable future by strengthening the talent pool.

Furthermore, companies today that operate globally recognize that evolving media makes doing business overseas more efficient and effective. A recent online article in the fall issue of Northern Trust's *Wealth* magazine, "It's a Small, Small World," sums it up: "Technology makes the world seem much smaller now; companies at opposite corners of the earth can do business together and react instantly to one another's decisions."<sup>53</sup>

More and more companies are using advanced technology to improve the way they do business and provide service to their customers by offering services online, offering information through video podcasts, and communicating through interactive digital technology like Webcasts. As social-networking takes hold, it is generally believed that even the most conservative organizations will use this as a mainstream tool for communicating with clients in the near future.

While academics, government agencies, and children media advocacy agencies alike are sought after to research the effects of evolving media, there appears to be a gap in the research in regards to the for-profit sector's impact and responsibility in this area. As much of the literature focuses on preparing students for 21<sup>st</sup> century jobs, it is apparent that the for-profit sector has a large stake in this issue and should play a key role in ongoing discussions and research.

### **A Corporate Responsibility to Communities**

Countless organizations are involved in their community not only to burnish their brand, but to ensure a healthy pipeline of talent to bring intelligent, innovative employees to their organizations. For example, realizing an impending talent shortage in the technology field, Motorola has made huge financial investments to inspire children to consider professions in technology.<sup>54</sup> IBM's commitment to education includes the Reinventing Education grant program that helps schools around the world integrate technology solutions to enhance education opportunities.<sup>55</sup> HP offers free online lessons and tutorials to assist children learn basic and safe-use computing skills.<sup>56</sup> Microsoft's Unlimited Potential commitment aims to ensure individuals are able to acquire information technology skills deemed necessary to succeed in the workplace.<sup>57</sup>

These are only samples of the huge commitment the business community has made to children and technology over the years. Considering the size of these commitments and the business community's stake in children's technology skills, the commission should seek or

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<sup>53</sup> Northern Trust's *Wealth* magazine, Web-exclusive content, Fall 2009

<sup>54</sup> [www.motorola.com](http://www.motorola.com)

<sup>55</sup> [www.ibm.com](http://www.ibm.com)

<sup>56</sup> [www.hp.com](http://www.hp.com)

<sup>57</sup> [www.microsoft.com](http://www.microsoft.com)

employ further research on the business community's role in helping to empower parents and protect children in an evolving media landscape.

### **Provide Access to Children in Underserved Communities**

As several studies cited previously indicate, the biggest disparity in evolving educational media is in poor and inner city communities. We believe the FCC should look at how for-profit organizations can expand their reach to assist children in need. In an interview with a member of the board of the Mount Vernon school district in New York, she explained that access to electronic media simply does not rise to the top of the pyramid of needs for inner city schools. "We are still making sure that we are addressing children's basic needs." In addition she said: "Because of the way education is funded – based on property taxes, there is disparity in education available to children in inner city communities. In particular, in this environment where communities like Mount Vernon are experiencing high rates of foreclosure, providing learning through advanced media is not sustainable. On the other hand, wealthy neighboring communities like Bronxville, can afford to have Smart Boards in every classroom."<sup>58</sup>

As part of various organizations' commitment to community involvement, corporations seek to assist underserved communities. Because many underserved areas do not have large corporations in their communities, or may receive unequal support from those corporations in the area, these communities may not realize the full benefits that corporate community investment programs can provide to address these issues. We recommend that the FCC examine incentives that the government may provide to corporations so that they might expand their reach into these communities and work with schools and libraries to facilitate access and educational media training to teachers, children and their parents.

### **Consider Foreign Models**

We urge the FCC to consider how the United Kingdom and other nations with successful models are advancing technology to ensure that parents are empowered, and children are protected as well as making the best use of evolving media to achieve the highest standards available in education. In a recent news story, Chicago's CBS 2 reported that the U.K. had recently instituted a panic button on social networking Web sites so that children who felt like they were being bullied could alert the police. Is this a measure of cyber-bullying protection that we can implement in the U.S.? Can we expand it to include other Internet threats? What role would ISPs and parents play?

In Canada, where the curriculum is set by the government, there are computer labs in inner city schools. According to a Canadian teacher we interviewed who teaches in a Toronto inner city school district, her third grade students spend time in the computer lab three times per week for 40 minutes per day. In Canada, the government provides assistance to inner city schools and will subsidize the cost of a computer for a child in need. Furthermore, children in public schools can take computer courses during the summer break at private Catholic schools at no cost to the student.<sup>59</sup> We recommend that the FCC take a comparative look at the Toronto School District School Board curriculum to see whether there are similar measures that we can implement in U.S. schools.

Not to be ignored is the pool of talent that the United States employs from China and India for careers in technology. As the economies of these countries grow, the pool of talent available for U.S. jobs will shrink and we will undoubtedly face a shortage of trained

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<sup>58</sup> Interview with D. Farquharson, Mount Vernon School District School Board, New York

<sup>59</sup> Interview with an elementary public school teacher in the Toronto School District, Canada

professionals in this field in the future if we do not provide access to evolving media education to all children.

### **Recommendations for Topics of Further Research**

While researching this subject, we discovered many compelling topics where there is a dearth of information that can be considered for further research:

1. Can mandatory Internet safety training for public school teachers and students further inform children and assure parents of a child's safe use of the Internet? Can parents be required to be part of this training or a subset of this training just for parents?
2. Just as the radio, television, and telephone industries have undergone substantial content and rate regulation, what is the potential for similar regulation for the Internet to protect children from potential adverse effects of Internet use?
3. Some parents may feel uncomfortable with new technologies because they were not raised with these tools. These individuals should be educated on how they can use powerful tools such as the Internet and text messages to provide feedback on children's programming and technology. What can schools and libraries do to help parents know how to find and recognize E/I programming on the television and identify filtering software for their computer to ensure safe Internet use?
4. What incentives can the government provide to support non-commercial educational children's' programming?
5. For gifted children, how does technology and media influence their ability to grasp concepts and information more quickly than their peers?

### **Conclusion**

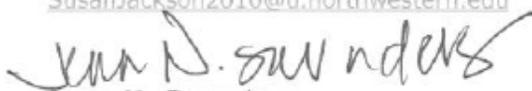
"There has never been a more important time to take advantage of how digital technology can enhance the educational experience for children. We must dedicate ourselves as an industry to harness this energy into positive purposes to give the next generation the tools to be well-rounded, adults who dedicate themselves to improving the world they are inheriting." (The New Frontier of Educational Television by Gary E. Knell, President and CEO, Sesame Workshop)

Thank you for providing us an outlet to voice our thoughts on this matter. We hope the information and insights we provided will further develop a record to help the FCC as it seeks to empower parents and help their children take advantage of these opportunities, while at the same time protecting children from the risks inherent in use of these platforms.

Sincerely,



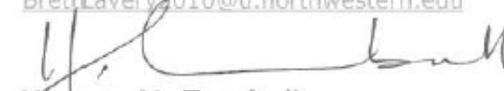
**Susan Jackson Redman**  
[SusanJackson2010@u.northwestern.edu](mailto:SusanJackson2010@u.northwestern.edu)



**Jenn N. Saunders**  
[jennifersaunders2010@u.northwestern.edu](mailto:jennifersaunders2010@u.northwestern.edu)



**Brett Lavery**  
[BrettLavery2010@u.northwestern.edu](mailto:BrettLavery2010@u.northwestern.edu)



**Yvonne M. Turnbull**  
[x3k8i4@u.northwestern.edu](mailto:x3k8i4@u.northwestern.edu)