

CONCERNED
WOMEN *for* AMERICA

March 12, 2019

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

Re: MB Docket No. 19-41

To Whom It May Concern:

Concerned Women for America (CWA) is the largest public policy organization for women in the country with hundreds of thousands of supporters spanning every state of the union. The women I represent are mothers, grandmothers, aunts, daughters, and granddaughters who are increasingly frustrated with the current television and movie rating systems that have proven to be inconsistent and unreliable.

An effort that was presented as aiming to benefit the public has in fact developed, unsurprisingly, into a system benefiting those who control it, the entertainment industry. TV is more dangerous for families today than it was before this system was devised.

You ask, “Are programs with violent, sexual, or other content that may be inappropriate for children being rated accurately?” No, they are not. Graphic sexual scenes, adult topics, violence, and profanity are routinely rated as appropriate for children. TV-14 and TV-PG ratings are routinely abused to peddle violent, lewd, and salacious content, to the horror of parents who are helpless once their children are exposed to the material without proper warning. This is, of course, an ideal business model which gives advertisers a much larger audience, but it is most certainly not in the best interest of families.

“Are both the age and content-based ratings being correctly applied? Are the ratings being applied consistently, or is programming with similar content being rated differently?” Again, the answer to both these questions we hear from the thousands of women I represent is a resounding, “No.” Even the same shows are sometimes rated differently when broadcast on different networks. Many parents have virtually given up on the ratings system, increasingly asking for guidance from non-profit organizations like ours on whether a show is *really* appropriate for their children, whatever the networks say with their self-serving ratings. Parents feel the ratings line is always moving, and it is always moving towards more degrading material being acceptable for younger audiences.

And even if a show is found to have been wrongly rated, what are the consequences for the network? Are there *any*?

If a drug company mislabels a drug, they would face serious consequences at the hands of the Food and Drug Administration (FDA). They would probably have to spend millions of dollars to alert the public in

order to rectify their error. Why is this not the case here? In the case of the entertainment industry, it is even worse, because we know they are intentionally labeling these programs to push the envelope. They intend to get away with as much as they can in order to maximize their audience, which equals profits.

CWA supporters want to urge you to take a more active role to help protect families against this coordinated assault by entertainment companies.

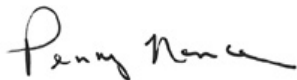
The “Oversight Monitoring Board” (OMB) is also a source of frustration. This is a darkly covered body overwhelmingly composed of industry members who even get to choose the very few advocates for families that are part of it. Transparency, which should be at the core of such a body, is virtually non-existent. There is no record of their meetings, when and how often they meet, what is discussed — everything is secret. How can the public feel any assurance that their complaints are being handled appropriately when the people they are complaining about get to judge themselves in secret with virtually no accountability?

The entertainment industry has been masterful in keeping this body under a deep cloud. Most parents do not have any idea that OMB even exists, let alone who is a member of it. They are completely unaccountable. How can we allow this to continue? CWA supporters can’t believe it when we inform them that not even a representative of the Federal Communications Commission (FCC) is part of this mysterious group. And since no press is allowed in the meetings either, can there be any doubt that the public is systematically and intentionally being kept in the dark on this process?

It is time the FCC takes the concerns of parents in this area seriously and exercises the considerable power Congress has granted it to act in the best interest of the public. The entertainment industry has been granted the chance it wanted to do the right thing by families and come up with a process that could empower citizens with the information they need to make the best decisions for their families. But it has taken advantage of the public, betraying our trust, and it is time for the FCC to intervene.

We urge you to revise both the failing rating system and the OMB. It is time to put American families first.

Sincerely,



Penny Nance
CEO & President
Concerned Women for America