



Rating Sex and Violence in the Media: *Media Ratings and Proposals for Reform*



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Film Ratings

Motion Picture Association of America Classification and Ratings Administration

The Motion Picture Association of America (MPAA)'s Classification and Ratings Administration (CARA) is the longest-lived media rating system in the United States. The current rating system is one of a series of self-regulatory actions taken by the MPAA, a film industry trade group, over many years. From 1931 to 1968, the MPAA sponsored the Hays Production Code, which required that films meet standards concerning sexuality, vulgarity, religion, "repellent subjects," and "national feelings," or not be released at all. (Leff, 1990) Then, in 1968, when two U.S. Supreme Court decisions gave state governments the right to control minors' access to films, the MPAA responded by adopting the Voluntary Movie Rating System. Less restrictive than the Hays Code, this system advises audiences about the age-appropriateness of films and limits minors' access to films with adult themes. (Valenti, 2002)

The CARA rating board is composed of eight to thirteen members, employed by the MPAA. (Valenti, 2002) Producers/distributors present their films for review and pay a fee for this service. The board, by majority vote, determines a rating and provides a brief written rationale for the decision. Producers/distributors unhappy with the rating can edit the film and resubmit it for another review. They also have the choice of releasing their films without a rating.

If they are dissatisfied with a ruling of the Rating Board and unwilling to edit their film, they can submit it to a separate 14- to 18-member Rating Appeals Board, whose membership is composed of theater owners and producers/distributors. Appeals board members are appointed by MPAA member companies and the National Association of Theater Owners. The president of the MPAA serves as its chair. The Board must achieve a two-thirds vote to overturn a rating.

There are no special professional qualifications for CARA board membership. All board members must, however, be parents, and "must be possessed of an intelligent maturity, and most of all, have the capacity to put themselves in the role of most American parents so they can view a film and apply a rating that most parents would find suitable and helpful in aiding their decisions about their children's moviegoing." (Valenti, 2002) With the exception of the board chair, the identities of CARA board members are kept secret to the public, though some family and occupational background information about them is released.

In 2001, a former rating board member, Jay Landers, commented unofficially on some of the inner workings of the process to the Washington Post. According to Landers, who served on the board from 1990 to 2000, the 12-member rating board consists of nine "junior" raters, some of whom work part time and some full time, and three "senior members." (Waxman, 2001) The "senior" members serve as long as they wish, while the junior members have five-year maximum terms. (Waxman, 2001) When rating decisions are made, it is the senior raters who inform directors of the rating and to offer guidance as to how to re-edit the movie, if a different rating is desired by the director. (Waxman, 2001)

The MPAA Voluntary Movie Rating System has been revised several times since its inception. The original "X" rating was abandoned because it was not trademarked. The rating system currently provides for five ratings categories:

- G for "General Audiences. All ages admitted."
- PG for "Parental Guidance Suggested. Some material may not be suitable for children."
- PG-13 for "Parents strongly cautioned. Some material may be inappropriate for children under 13."
- R for "Restricted. Under 17 requires accompanying parent or adult guardian." (Age varies in some jurisdictions).
- NC-17 for "No one 17 and under admitted."

On September 26, 2000, the Motion Picture Association of America announced a series of rating-related initiatives. Included in the announcement was a pledge that each MPAA company would "request theater owners not to show trailers advertising films rated R for violence in connection

with the exhibition of its G-rated films. In addition, each company will not attach trailers for films rated R for violence on G-rated movies on videocassettes or DVDs containing G-rated movies.” (Motion Picture Association of America, 2001: 121) In addition, the companies promised that all film advertisements would include the reasons for the film’s rating, as well as the rating itself. (Motion Picture Association of America, 2001: 122) Further, the reasons for the ratings are now made available on a special website, www.filmratings.com, and on the packaging of videos and DVDs. (Motion Picture Association of America, 2001: 122) Some examples of the ratings reasons for recent films are: Men in Black, Rated “R” for “Sci-Fi Action Violence, Some Provocative Humor;” Pumpkin, rated “R” for “Language and a Scene of Sexuality;” K-19, rated “PG-13” for “Disturbing Images;” Road to Perdition, rated “R” for “Violence and Language;” and Reign of Fire, rated “PG-13, for “Intense Action Violence.” (www.filmratings.com)

Film Advertisements

Unlike the films themselves, all movie advertising is approved or disapproved by the MPAA. In the case of ads, such ratings are given out by the MPAA’s Advertising Administration department. Though a like set of standards are applied to magazine, newspaper, billboard, radio, and television ads, movie trailers are judged on a different, and stricter, basis. Trailers are approved either for all audiences, or to be seen only in showings of “R” or “NC-17” films. (Valenti, 2002)

Public Opinion on Movie Ratings

A recent national survey of 800 parents of children ages 2–17, conducted by the Kaiser Family Foundation, asked whether parents “ever” used the rating system for movies to help guide their families’ choices. The survey found that 84 percent of parents said they did use the labels, while 16 percent said they did not. (Kaiser Family Foundation, 2001: 6) The survey also found that 53 percent of parents found the system “very useful,” while 40 percent said it was “somewhat useful,” with 5 percent responding “not too useful,” and 2 percent found the system “not at all useful.” (Kaiser Family Foundation, 2001: 6)

The Motion Picture of America annually polls parents regarding the usefulness of the movie rating system. The 2001 survey found that 81% of parents with children under the age of thirteen found the movie rating system “very useful to fairly useful” as a guide for deciding what movies children should see. (Valenti, 2001a: 7)

Studies of the MPAA System

The “Forbidden Fruit” Effect

Some studies have indicated that the MPAA’s age-based ratings may attract the very audiences they are designed to protect. The National Television Violence Study (NTVS) evaluated the effect of various rating systems on young people’s media choices. (Center for Communication and Social Policy, 1996–1998) The NTVS found that the MPAA system’s ratings of “PG-13” and “R” increase young people’s desire to view media content that has been given those labels. (Cantor, 1997: 285-6; Federman, 1997: 35) In the study, children ages 5–14 were given a programming guide and instructed to select one of three programs or movies described on each page. The children were told that the guides were “ballots” for a vote to select television shows they would later watch. The various programs and movies in the guides were randomly assigned MPAA ratings, premium television ratings, and a variety of parental and viewer advisories.

The findings revealed that among children ages 10–14, and especially among boys in this age group, the ratings of “PG-13” and “R” made a movie more attractive and the rating of “G” reduced its attractiveness. For example, boys age 10–14 completely avoided a movie when they thought it was rated “G”, but at least half of them chose to watch it when it was rated “PG-13” or “R.” The study also found that more aggressive younger children were more interested in movies that had restrictive ratings. (Cantor, 1997: 291; Federman, 1997: 36)

Similarly, in a study of young adolescents' responses to movie, television, and computer game ratings and advisories, Stanford University researchers John Morkes, Helen Chen, and Donald Roberts found that "there was an overall increase in film desirability as the MPAA age restriction increased... (S)tudents preferred PG-13 and R rated films to G rated films." (Morkes, 1997: 9) This result was primarily due to the effect of the ratings on boys. For girls, by contrast, "there was no statistically significant difference in desirability of the film as a function of rating."

Research is more mixed as to whether other forms of rating, such as purely content-based ratings, have a "forbidden fruit" effect as well. The National Television Violence Study showed that a variety of content-based rating systems did not increase children's interest in viewing movies with higher violence levels. (Cantor, 1997: 282–302; Federman, 1997: 35–6) By contrast, Morkes, Chen, and Roberts tested the effect of violence labels on young people's computer game preferences, and found that the label "blood and gore" significantly increased the desirability of games for boys, compared to the label "appropriate for all ages." (Morkes, 1997: 10)

Criticisms of the MPAA System

Over the years, critics from within and outside the entertainment industry have leveled criticisms at the MPAA movie rating system. These include:

Relative Lenience with Violence Versus Sexuality

The MPAA system has been charged with being more lenient with violence than with sexual material. For example, the American Psychological Association's Commission on Youth and Violence claims that, according to the MPAA's classification standards, "any depiction of sexuality will automatically render a film an 'R' rating, and explicit sex will often earn an 'NC-17' rating. In contrast, a film can contain violence and still be given a 'G,' 'PG,' or 'PG-13' rating." (Donnerstein, 1993)

Jay Landers, the former MPAA rater mentioned above, has claimed that while the rating board's standards regarding rating levels are generally vague, there are clear rules of thumb about sexual language: "One sexual expletive automatically results in a PG-13 rating. Two sexual expletives automatically result in an R rating. But one sexual expletive used in a sexual context is an automatic 'R.'" (Waxman, 2001)

The MPAA has also been persistently criticized over the years by filmmakers and film critics for perceived leniency in individual film-rating decisions regarding the portrayal of violence and relative strictness regarding the depiction of sexuality. (Federman, 1996: 6–7) For example, director Todd Solondz protested MPAA rating guidelines by superimposing a large red box to cover a sexual scene in his 2002 film, *Storytelling*. (Bing, 2001) According to Solondz, the MPAA had deemed the scene, which showed a college professor having sex with a student, "pornographic," and required that the scene be edited as a prerequisite for the film to receive an "R" rating, as opposed to an "NC-17." Similarly, an orgy scene from the Stanley Kubrick film *Eyes Wide Shut*, was digitally obscured in order to avoid an "NC-17" rating. (Sylvester, 1999) By contrast, Jim Isaac, director of *Jason X*, a "Friday the 13th" film, expressed surprise at what he perceived as the MPAA's leniency with the violence in his film. (Szymanski, 2002: D2) The film—which depicts a woman's face being frozen and smashed into pieces, two women getting beaten to death, and a man being sliced in half—received an "R" rating. Isaac commented: "I really expected to have to take out a lot more [in order to receive the "R" rating.]. I had a whole list ready for when they returned it to us." (Szymanski, 2002: D2)

"Ratings Creep"

Some critics of the MPAA rating system claim that the system has, over time, stretched the boundaries of what is considered acceptable in certain rating categories, a charge that is sometimes referred to as "ratings creep." (Kennedy, 2002) Though this charge has not been verified empirically to date, it is one that has been made widely, even from those who have served on the MPAA rating board. According to former board member Jay Landers, filmmakers can sometimes "wear down the board" through multiple submissions of edited versions of a film, thus persuading the board to include material that otherwise might not be thought acceptable for a particular rating category. (Quoted in Kennedy,

2002) Describing this process, Landers states that “(t)here is no hard and fast line between any of these categories. It’s all a continuum.... Once you see something five or six times, you can feel, well, maybe they’ve done enough.” (Quoted in Kennedy, 2002)

Critics charge that such “ratings creep” is most apparent in the MPAA’s PG-13 and R categories, as filmmakers push to have their films rated “PG-13” for commercial reasons. In four of the last five years, seven of the ten highest-grossing films have been rated PG-13. (Kennedy, 2002) Also, criticism by the Federal Trade Commission that R-rated films have been marketed to children under 17 (see below) has led filmmakers to seek PG-13 ratings for their films rather than face potential marketing limitations. (Kennedy, 2002)

Critics also claim that the commercial nonviability of NC-17-rated films has led to pressure on filmmakers to seek—and the rating board to grant—R ratings to films that have extreme content. It is a well-known common practice in the movie industry for studios to contractually require filmmakers to produce films that receive no more than an R rating. (Tierney, 2002) As the Directors’ Guild of America argues: “(M)any films that should not be seen by minors are re-cut to receive a ‘hard’ R rating. Such action is not only compromising filmmakers’ visions, but also greatly increasing the likelihood that adult-oriented movies are seen by the very groups for which they are not intended.” (Directors Guild of America, 2001: 134) This situation, critics charge, has led the MPAA rating board to invent new content descriptors for R-rated films to reflect the expansion of the content included in the category. For example, the film *House of 1,000 Corpses* was rated R for “extremely sadistic violence.” (Tierney, 2002)

Movie Ratings Policy Options

Create a New Adults-Only Rating

The MPAA’s NC-17 rating has incurred criticism from filmmakers and film critics alike. Any film receiving the rating is burdened by enormous barriers to commercial success, since major theater chains refuse to show such films, and many newspapers will not carry advertisements for them. As a result, filmmakers regularly choose to edit their films and resubmit them to the MPAA for re-classification with an R rating, or, less often, to release their films unrated. (Ross, 2001) Subsequent to the financial failure of the NC-17-rated film *Orgazmo*, released in 1998, only one film, *L.I.E.*, has been released with an NC-17 rating. (Ross, 2001) As a result, a proposal for a new “adults-only” rating—to fit between R and NC-17—has circulated both within and outside the film industry. Advocates of the reform include the Directors Guild of America, which argues that “the motion picture industry itself would benefit from a ratings system that does a better job of acknowledging that some films simply are not intended for and should not be seen by children or teens.” (Directors Guild of America, 2001: 134) The Guild has held meetings with the National Association of Theater Owners (NATO) to discuss the possibility either of a new adults-only rating or a move to gain wider theater distribution for NC-17 films. (Tierney, 2002) A NATO survey of theater owners found that a majority would be willing to play NC-17 films that are of high quality. (Tierney, 2002)

Reform Marketing and Accessibility Practices

Responding initially to a June 1, 1999 request by President Bill Clinton, and then to subsequent requests by the United States Congress, the Federal Trade Commission (FTC) has published three reports on entertainment industry practices related to media ratings. The first report, titled *Marketing Violent Entertainment to Children: A Review of Self-Regulation and Industry Practices in the Motion Picture, Music Recording & Electronic Game Industries*, was issued in September 2000; follow-up reviews were published in April 2001, December 2001, and June 2002. (Federal Trade Commission [FTC], 2000, 2001a, 2001b, 2002)

For the film industry component of its report, the FTC studied the marketing practices of major movie studios. In its first report, the commission found that, of the 44 R-rated films it studied, 35, or 80 percent, were target marketed to children under the age of 17. (FTC, 2000: 13) In a majority of the cases studied, the marketing plans for the films contained “express statements that the film’s target

audience included children under 17.” (FTC, 2000: 13–14) Additionally, the study found that 45 percent of the films studied that were rated PG-13 were marketed to children 11 or younger. (FTC, 2000: 14)

The FTC also conducted tests of theaters’ enforcement of the access component of the R rating. In an “undercover shopper survey” of 395 theaters conducted between May and July 2000, the FTC found that unaccompanied 13- to 16-year-old children were able to purchase tickets to R-rated films 46 percent of the time. (FTC, 2000: 20)

As a result of these findings, the FTC made several proposals for reform of movie industry marketing practices:

- the movie industry “should establish or expand codes that prohibit target marketing [of restricted films to children] and impose sanctions for violations.” (FTC, 2000: 54)
- retailers should be encouraged to check the age of customers before selling or renting R-rated videos. (FTC, 2000: 55)
- the industry should increase parental awareness of its rating system. (FTC, 2000: 55)

In its follow-up reports six months and one year after their original research, the FTC found that the movie industry had made “commendable progress” in its marketing practices. (FTC 2001a: i) Specifically, the commission found that the studios no longer targeted children under 17 in their marketing plans for R-rated movies, and that the relevant studios had “largely” fulfilled their pledge to not market films rated R on television programs or in print media that have children under 17 as more than 35 percent of their audience. (FTC, 2001b: 3–4) However, the FTC’s follow-up “mystery shopper” survey found that the percentage of unaccompanied children under 17 who are able to purchase tickets to R-rated films remained “essentially unchanged.” (FTC, 2001b: 13) Finally, in its June 2002 follow-up report, the commission noted a “major improvement” in industry practices regarding disclosure of ratings and reasons for ratings in advertising for films—a positive development qualified, in part, by their observation that in many ads the ratings reasons were too small to read. (FTC, 2002: ii)

The commission recommends further improvement in industry marketing practices, including adoption of industry-wide standards to limit advertisements for R-rated films in “venues most popular with teens,” taking into account the following factors: “the percentage of the audience under 17; the total number of children reached; whether the content is youth-oriented; and the popularity with children and apparent ages of the characters or performers.” (FTC, 2001b: 35)

In response to the FTC reports, U.S. Senator Joseph Lieberman (D-CT) introduced the Media Marketing Accountability Act of 2001, which would empower the FTC to fine those media companies that rate their products unsuitable for children, and then market those products to minors. (Bash, 2001)

Television Ratings

TV Parental Guidelines

The United States Telecommunications Act of 1996, signed into law by President Clinton in February of that year, required the inclusion of V-chip technology in all newly manufactured television sets with screens larger than 13 inches within two years of the law's enactment. The law also empowered the Federal Communications Commission (FCC) to create a committee to develop its own television content code, should the television industry fail to create its own rating system compatible with V-chip technology within one year.

As a result, in December 1996, a television industry coalition composed of the National Association of Broadcasters, the National Cable Television Association, and the Motion Picture Association of America, announced the creation of the "TV Parental Guidelines."

The TV Parental Guidelines are divided into two groups: rating categories for programs designed for children; and categories for programs designed for the entire audience. The original ratings were: TVY (All Children), TVY7 (Directed to Older Children—age 7 and older), TVG (General Audience), TVPG (Parental Guidance Suggested), TV14 (Parents Strongly Cautioned—may be unsuitable for children under 14), and TVM (Mature Audience Only—may be unsuitable for children under 17). (Valenti, 1997)

The industry's guidelines immediately came under strong attack from parents groups, media researchers, members of Congress, public health associations, and media advocacy organizations. (Fleming, 1997) The critics cited public opinion surveys that showed the overwhelming majority of the public—and, particularly, parents—preferred a rating system that described the content of shows rather than one that designated their suitability according to age. They also cited studies that showed that age-based ratings can attract some children to those very shows that the ratings are intended to deter them from watching. (Cantor, 1977)

As a result of this criticism, the industry entered into several months of negotiations with some of its major organizational critics (the American Medical Association, the American Academy of Pediatrics, the American Psychological Association, the Center for Media Education, the Children's Defense Fund, Children Now, the National Association of Elementary School Principals, the National Education Association, and the National Parent Teacher Association of America). The negotiations resulted in an agreement outlining modifications to the system, including the addition of certain content information to the rating system, such as "V," for violence, "S," for sexual situations, and "L," for strong language. As part of the agreement, the advocacy groups joined the industry in recommending to the FCC that the MPAA rating system and the new TV rating system be the only systems mandated for inclusion on the V-chip.

Under this revised TV Parental Guidelines system, ratings are assigned to programs by broadcast and cable networks and by producers. In addition, local television stations have the right to substitute the rating they deem most suitable for their particular audience. The ratings icons and associated content symbols appear for 15 seconds at the beginning of all rated programming.

The guidelines are applied to all television programming except news and sports. (Valenti, 1997: 5) Unedited movies that are often shown on premium cable channels carry their original MPAA ratings; movies produced before the creation of the MPAA rating system (1968) and movies that are edited for television are given TV Parental Guideline ratings.

The industry also established an Oversight Monitoring Board to "ensure that the Guidelines are applied accurately and consistently to television programming." (Valenti, 1977: 4) Board membership, as revised in the industry/advocacy group agreement, includes 24 members, six each from the broadcast industry, cable industry, and program production community, five from the advocacy community, and a chairman. The first chairman of the board is Jack Valenti, President of the Motion Picture Association of America.

Following are the revised TV Parental Guidelines rating categories, as submitted by the television industry to the Federal Communications Commission on September 10, 1997: (Valenti, 1997)

The following categories apply to programs designed solely for children:

TVY All Children. This program is designed to be appropriate for all children. Whether animated or live-action, the themes and elements in this program are specifically designed for a very young audience, including children ages 2–6. This program is not expected to frighten younger children.

TVY7 Directed to Older Children. This program is designed for children age 7 and above. It may be more appropriate for children who have acquired the developmental skills needed to distinguish between make-believe and reality. Themes and elements in this program may include mild fantasy violence or comedic violence, or may frighten children under the age of 7. Therefore, parents may wish to consider the suitability of this program for their very young children. Note: For those programs where fantasy violence may be more intense or more combative than other programs in this category, such programs will be designated TV-Y7-FV.

The following categories apply to programs designed for the entire audience:

TVG General Audience. Most parents would find this program suitable for all ages. Although this rating does not signify a program designed specifically for children, most parents may let younger children watch this program unattended. It contains little or no violence, no strong language, and little or no sexual dialogue or situations.

TVPG Parental Guidance Suggested. This program contains material that parents may find unsuitable for younger children. Many parents may want to watch it with their younger children. The theme itself may call for parental guidance and/or the program contains one or more of the following: moderate violence (V), some sexual situations (S), infrequent coarse language (L), or some suggestive dialogue (D).

TV14 Parents Strongly Cautioned. This program contains some material that many parents would find unsuitable for children under 14 years of age. Parents are strongly urged to exercise greater care in monitoring this program and are cautioned against letting children under the age of 14 watch unattended. This program contains one or more of the following: intense violence (V), intense sexual situations (S), strong coarse language (L), or intensely suggestive dialogue (D).

TVMA Mature Audience Only. This program is specifically designed to be viewed by adults and therefore may be unsuitable for children under 17. This program contains one or more of the following: graphic violence (V), explicit sexual activity (S), or crude indecent language (L)

Almost all broadcast and cable networks were utilizing the TV Parental Guidelines rating system by October 1, 1997. (Kimberley Fritts, personal communication, July 25, 2002; Fritts represents PodestaMattoon, a public affairs firm that helps coordinate the activities of the TV Parental Guidelines Advisory Board.) However, one television network, the National Broadcasting Company (NBC) has refused to sign on to the revised TV Parental Guidelines system. NBC argues that the new system will have “a chilling effect” on program content; the network uses only the age-based portion of the ratings, rather than the content descriptors such as V, S, or L. (Boliek, 1997) NBC has instead pledged to increase its use of on-air program advisories. Black Entertainment Television (BET) also initially refused to participate in the revised system but subsequently decided to participate.

ABC Family Channel Advisories

In February 2001, the Fox Family Channel launched a system of customized on-air advisories to “help families more effectively use the V-chip ratings system for television.” (Fox Family Channel, 2001: 1) When the channel was bought by ABC in October 2001 and became the ABC Family Channel, the system was kept in place. The ratings advisory messages are determined by network staff.

The advisory messages precede the programs and last for 10 seconds. (ABC Family, 2002) They appear on the full TV screen and have a voiceover message indicating both the rating recommendation and the reason for the rating. For example, the voiceover message from the advisory for the program “Whose Line Is It Anyway,” is the following: “‘Whose Line Is It Anyway’ is next. We recommend viewers be adults and teenagers, as it has some suggestive dialogue and occasional coarse language. Acting like Drew doesn’t help.” (ABC Family, 2002) On the right-hand side of the screen is the rating—“TV-PG D L”—along with the reasons for the rating, spelled out: “suggestive dialogue, course language.” (ABC Family, 2002) On the left-hand side of the screen is an animated image of a family. When the recommendation that the show is only for older audiences is mentioned by the voiceover, the younger (smaller) children walk off the screen. (ABC Family, 2002)

In addition to the advisory messages for each TV Parental Guideline rating, ABC also includes a message recommending programs suitable for children 8 years of age or older. (Moss, 2001)

Premium Cable Television Advisories

In addition to the TV Parental Guidelines, four premium cable networks—Cinemax, HBO, The Movie Channel, and Showtime—continue to use a previously developed content advisory system that provides descriptive advisories. This voluntary system was established to provide viewers with information about programming containing violence, sex, and offensive language.

Executives in the cable networks’ programming departments are responsible for evaluating programs. Because each network labels its own programs, however, it is possible that a movie might receive different advisory labels on different stations. As Showtime’s former Executive Vice President McAdory Lipscomb commented, “It is possible that we would rank something different than HBO, but we both recognize our dual responsibility to provide information to our subscribers about what is graphic or perhaps unsuitable for children, and we think the common language we’ve developed will provide an acceptable parameter.” (Federman, 1996: 87)

Unlike the TV Parental Guidelines, the premium channel labels appear in full screen prior to programs and use full words to describe the relevant content. However, the V-chip does not allow consumers to block programs based on the premium channel labels.

As many as five labels, which appear both on the air and in program guides, may be applied to a movie or program. The premium television content advisory system includes the following descriptive codes:

MV	<i>Mild Violence</i>
V	<i>Violence</i>
GV	<i>Graphic Violence</i>
RP	<i>Rape</i>
AL	<i>Adult Language</i>
GL	<i>Graphic Language</i>
BN	<i>Brief Nudity</i>
N	<i>Nudity</i>
AC	<i>Adult Content</i>
SC	<i>Strong Sexual Content</i>

The V-chip

The V-chip is a technological device that enables consumers to block particular television programming from appearing on their TV sets. Television ratings that appear on the screen during the first 15 seconds of a program contain electronic identification signals that are interpreted by the V-chip. (Center for Media Education, 2002) Consumers can block shows with certain ratings by programming their V-chip-equipped television sets using an on-screen menu of options. Currently, shows can be blocked according to the TV Parental Guidelines, or, when applicable, the Motion Picture of America’s movie ratings. Using the TV Parental Guidelines, parents can block shows according to the age-based categories (such as TV-PG or TV-14) or content descriptors (such as V for Violence or S

for Sexual Situations). As part of the V-chip setup, parents enter a personal identification number that acts as a password, allowing them to change settings or deactivate the V-chip.

As of January 2000, all television sets with screens that are 13 inches or larger are required by law to include a V-chip. It has been estimated that, as of 1991, thirty million television sets were sold with a V-chip, and that that number will increase, as new sets are sold, by at least twenty-five million each year. (Valenti, 2001a: 4)

As of July 2001, a Kaiser Family Foundation poll reported that 40 percent of all parents have a V-chip-equipped television in their homes. (Kaiser Family Foundation, 2001: 1) Of all parents that have a V-chip TV, 54 percent are not aware of that fact; 36 percent of parents who know they have a V-chip TV choose to use it. (Kaiser Family Foundation, 2001: 1)

Research on TV Ratings

TV Rating System Implementation

A September 1998 study, released by the Kaiser Family Foundation, provided a comprehensive independent assessment of the television industry's implementation of the TV Parental Guidelines. The study, titled "Rating the TV Ratings: One Year Out," was conducted by Dale Kunkel and colleagues at the University of California, Santa Barbara. The study was based on a sample composite week of randomly selected programs from a range of different channels, including the major broadcast networks (ABC, NBC, CBS, Fox), cable channels (Lifetime, Nickelodeon, TNT, USA, HBO), and independents (KTLA). The composite week included all programs broadcast on those channels between 7 AM and 11 PM.

The study found that the television industry applied a rating to 96 percent of qualifying programs. The study also found that, according to its standards, the television industry is doing a "good" job of differentiating programs into age-based categories: "For all four areas of content assessed in the study, there is a hierarchical progression with the lowest levels of sensitive material in programs with a TV-G rating, somewhat higher levels found in TV-PG shows, and the greatest level or intensity of sensitive content found in TV-14 programs." (Kunkel, 1998: 89)

However, the study found that content labels were applied to only one out of five programs that contain violence, sexual material, or adult language. (Kunkel, 1998: 88) As the study's authors note, this is especially troubling given opinion polls that show parents strongly preferring content-based information to age-based advisories. (Kunkel, 1998: 89)

TV Rating System Effects: The "Forbidden Fruit" Phenomenon

A 2001 study by David Bickham and John Wright of the University of Texas researched the effect of the TV Parental Guidelines on potential young TV viewers. (Bickham and Wright, 2001) The study involved an experiment in which 62 elementary-school-age children were randomly assigned to one of three groups. Each participant was given 20 videotapes and told to choose and watch one video. The video boxes were randomly assigned labels with one of three kinds of ratings: the TV Parental Guidelines age-based ratings alone, the TV Parental Guidelines content-based ratings alone, or a combination of the two. The researchers found that the participants tended to prefer programs with ratings that signaled a viewing restriction. Specifically, for all age-based ratings except TV-PG, there was a statistically significant relation between the restrictiveness of the rating and the desirability of viewing the program. (Bickham and Wright, 2001: 4) In other words, the "forbidden fruit" effect found in earlier studies of the MPAA age-based rating system, reported above, was confirmed. By contrast, there was no forbidden fruit effect for the content-only ratings. For "mixed" ratings (the actual TV Parental Guidelines), the forbidden fruit effect was weaker: only the programs rated TV-MA showed a statistically significant tendency to be more desirable. (Bickham and Wright, 2001: 4) The researchers concluded that "content-based ratings...do not elicit [the forbidden fruit effect] to the extent age-ratings do. Children may interpret age-based ratings as restricting their choice and content-based ratings as providing information on which to make a choice. The addition of content to the original television system appears to have reduced its enticing qualities. For future rating systems,

purely content-based systems, which more fully meet the needs of children and parents, should be considered.” (Bickham and Wright, 2001: 5)

Public Opinion on the TV Parental Advisory System

A national poll of parents for the Kaiser Family Foundation measured the degree of parental agreement with the TV rating classification system. The July 2001 survey found that 51 percent of parents who have used the ratings believed most shows are rated accurately, while 40 percent believed that they are not rated accurately. (Kaiser Family Foundation, 2001: 8)

Slightly more than half (56 percent) of parents told pollsters that they have used the TV Parental Guidelines to determine which programs their children watch. Twenty-eight percent of parents said they use the TV ratings “often.” (Kaiser Family Foundation, 2001: 1)

The survey also found that 48 percent of parents who use the ratings found the system “very useful,” while 44 percent said it was “somewhat useful,” with 6 percent responding “not too useful,” and 1 percent found the system “not at all useful.” (Kaiser Family Foundation, 2001: 6)

A June 2000 study conducted by the Annenberg Public Policy Center at the University of Pennsylvania found a slightly less enthusiastic response from parents. Annenberg’s survey of more than 1,200 parents of 2- to 17-year-olds found that only half of parents were even aware of the ratings (down from 70 percent in 1997) and that 39 percent reported using the ratings to guide their children’s viewing. (Annenberg, 2000: 32–34)

TV Ratings Policy Options

Critics of the TV Parental Guidelines have proposed a series of reforms that they variously believe would improve the system:

Better Training of Raters

As noted above, the TV Parental Guidelines ratings—as well as the premium channel ratings—are self-administered by individual producer or programming executives. Other than the descriptions of the ratings categories noted earlier, there are no official guidelines or standards regarding how television content should be rated according to the TV Parental Guidelines system. It has been suggested that ratings decision-makers at those networks should receive additional education and training to increase their knowledge of scientific research regarding the potentially harmful effects of various media depictions. As media researcher Dale Kunkel suggested in testimony before Congress: “Unless media ratings can consistently and accurately label the content that poses the greatest risk of harm to children, such systems cannot accomplish much help for parents.” (Kunkel, 2001: 76)

Increase Consumer Awareness about the TV Rating System and V-chips

Survey evidence suggests the need for educational efforts aimed at informing parents about the TV rating system and the V-chip. As discussed above, surveys conducted by the Annenberg Public Policy Center indicate that up to 50 percent of parents aren’t aware of the TV ratings system; while the Kaiser Foundation’s surveys find the awareness rate to be much higher (85 percent), the Foundation’s surveys indicate that more than a third of parents have never heard of the V-chip. (Annenberg, 2000; Kaiser Family Foundation, 2001: 3)

In a July 2001 national survey, the Kaiser Family Foundation found that even among those who have heard of the ratings system, many parents don’t understand what those ratings mean. Only 43 percent of parents with children age 2–6 could define the rating TV-Y7, 31 percent could define TV-Y, and 14 percent knew what FV (fantasy violence) means. (Kaiser Family Foundation, 2001: 3) Similarly, while 62 percent of parents understood what the rating V (violence) means, only half knew what the rating S (52%; sex) or L (50%, language) means, and only 5 percent understood what the rating D (suggestive dialogue) means. (Kaiser Family Foundation, 2001: 3)

Some advocates contend that, to date, there has been little concerted effort to promote awareness of the ratings system or the V-chip. The television networks have created public service ads, but according to tracking information collected by the Kaiser Family Foundation, those announcements received spotty airtime. These advocates suggest that there is much that could be done to “market” awareness of the ratings and the V-chip: convincing newspapers to publish the full ratings in their TV listings; running a more extensive advertising campaign on television, during hours when most viewers are watching; training television sales personnel about the V-chip and how to explain it to interested parents; and making parental controls easier to find in the product manuals for new televisions, with clearer explanations for how to set up those controls.

Expand Governmental Regulation of Television

As an alternative to media ratings, some have proposed government regulations that limit the amount of violence and sexual content in TV shows during the early evening hours, when children are most likely to be watching. U.S. Senator Fritz Hollings (D-SC) has introduced legislation in the 103rd, 104th, and 105th Congresses to provide a “safe harbor” from violent TV programs. Under this approach, violent programming could not be shown during hours when children make up a large part of the viewing audience. (Hollings, 2002)

Parents are evenly divided on whether such “family hour” restrictions should be imposed by the government, with 48 percent favoring such regulations, and 47 percent opposed. (Kaiser Family Foundation, 2001: 8)

U.S. Senator Sam Brownback (R-KS) introduced the Children’s Protection Act of 2001; the bill is intended to encourage the entertainment industry to develop a set of voluntary content guidelines by exempting broad industry agreements on such guidelines from antitrust laws. (S. 124, 2001)

Music Ratings

The Recording Industry Association of America's Parental Advisory System

In 1985, after a series of congressional hearings initiated by Tipper Gore and the Parents Music Resource Center (PMRC), the Recording Industry Association of America (RIAA), a trade association representing the major record producers, reached an agreement with the PMRC and the National PTA on the labeling of explicit lyrics. Under that agreement, record companies would voluntarily identify and label newly released sound recordings with lyrics that reflect explicit violence, explicit sex, or explicit substance abuse.

In 1990, the RIAA standardized the label that is still being used today. Under this system, labels reading "PARENTAL ADVISORY: EXPLICIT LYRICS" are affixed to some music cassettes, records, and CDs of an explicit nature. Beyond this advisory, however, no further distinctions in terms of content are made, such as whether the lyrics are "explicitly" violent, sexual, or profane.

In 1995, as a result of a controversy regarding rap music lyrics, the RIAA, along with the National Association of Recording Merchandisers, which represents record retailers, undertook a campaign to raise public awareness of the advisory system through merchandising and advertising. (Recording Industry Association of America, 1995) Specifically, they pledged to encourage record companies, retailers, and distributors to include the advisory logo in consumer advertising; provide signs in retail outlets to identify the logo and describe its meaning; and create an internal process to ensure the correct size and placement of the logos on music products. The RIAA also announced plans to adopt a parental advisory logo for music videos, as well as a standard advisory notice for recordings that are distributed electronically.

Several years later, responding to criticisms of this Parental Advisory System by the Federal Trade Commission (see below) and others, the RIAA revised its guidelines. The revised RIAA guidelines, effective April 1, 2002, suggest that recording companies take several issues into consideration when determining whether to apply a warning label, including:

- "whether, in light of contemporary cultural morals and standards and the choices and views of individual parents, the recording might be one that parents may not want their child to listen to;"
- "the context of the artist performing the material, as well as the expectations of the artist's audience, is also important. In addition to profanity, 'depictions of violence, sex, or substance abuse' must be considered when making a determination regarding the application of the Parental Advisory Label;"
- "Labeling is not a science; it requires sensitivity and common sense. Context, frequency, and emphasis are obviously important; isolated or unintelligible references to certain material might be insufficient to warrant application of the Label." (Recording Industry Association of America, 2002: 2)

The guidelines also provide recommendations regarding the use of the parental advisory label in consumer advertising and the use of the label in Internet-based sales and promotions. For example, the organization recommends that Web sites selling labeled recordings should indicate that fact in "all stages of the purchasing process—from search results to the shopping cart." (Recording Industry Association of America, 2002: 7)

The overwhelming majority of sound recordings do not receive a Parental Advisory label. The Recording Industry of America estimates that "(i)n an average retail store, less than one-half of one percent carry the parental advisory label." (Recording Industry Association of America, 2001: 2)

One major recording company, BMG, announced that as of July 31, 2002, it would begin to use expanded parental advisory labels on all its newly released explicit-content-labeled recordings; the new labels will specify whether the recordings have "violent content, sexual content, strong language, or some combination of the three." (FTC, 2002: 13) The content information will be included in advertisements for the recordings as well.

Research on Sound Recording Labels

A 1992 study by Peter Christenson of Lewis and Clark College examined the effect of the RIAA parental warning label on adolescent music preferences. (Christenson, 1992) The study measured the reactions of 145 middle-school students, ages 11–15. The students were randomly assigned to two groups, one in which the album cover of the music they were asked to judge had a parental advisory label, and a control group in which students heard and judged the same music that did not have the advisory label. The students were then asked to indicate on a five-point scale how much they liked the music and how much they would like to own the recording. The results showed that labeled music was liked less and desired less than unlabeled music. (Christenson, 1992)

Public Opinion on Sound Recording Labels

A national survey of 800 parents of children ages 2–17, conducted by the Kaiser Family Foundation, asked whether parents “ever” used the parental advisory system for sound recordings to help guide their families’ choices. The survey found that half of all parents said they did use the labels. (Kaiser Family Foundation, 2001: 6) The survey also found that among those who had used the advisories, 52 percent found the system “very useful,” while 38 percent said it was “somewhat useful,” with 6 percent responding “not too useful,” and 3 percent found the system “not at all useful.” (Kaiser Family Foundation, 2001: 6)

Sound Recording Labeling Policy Options

Institute Comprehensive Rating System for Sound Recordings

Many critics of the Parental Advisory System suggest that the program could be improved by instituting a comprehensive rating system for sound recordings. They argue that the current system provides insufficient information to parents regarding the content of music lyrics. Suggestions that the parental advisory system be replaced by a rating system for sound recordings date back at least as far as 1994, when the Congress conducted hearings to discuss violent lyrics in music recordings. (FTC, 2000: D11) Those calls were repeated in congressional hearings in 1997 (FTC, 2000: D12) and 2001. (Committee on Governmental Affairs, 2001: passim)

The Recording Industry Association of America has responded to calls for a comprehensive rating system for sound recordings by arguing that, unlike the case of rating systems for visual images, it would be extremely difficult to construct a system that would accurately or meaningfully categorize music lyrics. As Hilary Rosen, RIAA president, testified to Congress on this subject:

(W)e cannot make such subjective decisions when it comes to words.... Every lyric is going to mean something different to different people.... I do not want to tell a parent that when somebody says that they were blown away by that, whether that means that they have been shot, whether it is about the weather, or they are simply impressed. I think you have to concede that words are so different when it comes to interpretation than when you have a picture where there is very little doubt, and that is why we cannot do what seems like should have been an easy thing to do. (Rosen, 2001: 52)

Critics of the advisory system respond to the argument that music lyrics are too subjective to classify by asserting that other media rating systems have overcome similar barriers of subjectivity of content. Sen. Joseph Lieberman (D-CT) has argued “each of these other industries... have developed a system that is fairly comprehensible” and that he remains “unconvinced” that the music industry would be unable to develop a comparable system. (Committee on Governmental Affairs, 2001: 52)

Reform Industry Marketing Practices

The Federal Trade Commission reports Marketing Violent Entertainment to Children, cited above with regard to the movie industry, also covered recording industry marketing practices. As in the case of films, the FTC studied music industry marketing practices for products labeled as potentially

inappropriate for children. The FTC found in its initial report that of 55 music recordings labeled with parental advisory stickers, marketing plans for 15, or 27 percent, “expressly identified teenagers as part of the group to which the companies planned on marketing the explicit recordings.” (FTC, 2000: 31) The marketing plans for the remaining CDs “detailed the same methods of marketing as the plans that specifically identified teens as part of their target audience, including placing advertising in media that would reach a majority or substantial percentage of children under 17.” (FTC, 2000: 31) Further, the FTC found in its undercover shopper survey of 383 music stores nationally that children ages 13–16 were able to buy stickered CDs 85 percent of the time. (FTC, 2000: 36)

In its follow-up reports in 2001 and 2002, the FTC found “no change” in industry practices regarding the placement of ads for products carrying the parental advisory sticker. (FTC, 2001b: i; FTC, 2002: ii) Industry marketing documents reviewed by the commission continued to show plans for advertising stickered products in the most popular teen media venues. The Commission noted, however, that the music industry does not consider its parental advisory program to be age-based and therefore feels no necessary need for restraint of its marketing practices to children as a result of the labeling of products. (FTC, 2002: 11) The follow-up reports also noted also that the industry had begun to implement its new industry-wide guidelines for including parental advisory labels in all advertising of explicit-content labeled recordings. (FTC, 2001b: ii; FTC, 2002: ii)

The FTC recommended that the music industry could improve its labeling system by requiring labels to be accompanied by the reasons for such designations. This would, in turn, allow for those reasons to be printed in advertisements for the recordings. (FTC, 2001b: 35–6) The FTC also recommended that the music industry encourage third-party retailers to require parental permission prior to the purchase of labeled products. (FTC, 2001b: 36)

Interactive Electronic Game Ratings

The Entertainment Software Rating Board

The Entertainment Software Rating Board (ESRB) was established in 1994 by the Interactive Digital Software Association (IDSA). The ESRB is independent of the software association, and its rulings are not subject to review by the IDSA.

The ESRB classification system applies to software for all platforms. The system has two components: ratings symbols, which inform consumers regarding the appropriateness of the games for certain age groups, and content descriptors, which designate content of interest or concern. (Personal communication, Marc Szafran, acting executive director, Entertainment Software Rating Board (ESRB), August 26, 2002)

The ESRB rating symbols are as follows:

Early Childhood (EC). May be suitable for children ages three and older. Contains no material that parents would find inappropriate.

Everyone (E). Content may be suitable for persons ages six and older. May contain minimal violence—some comic mischief.

Teen (T). Content may be suitable for persons ages 13 and older. May contain violent content, mild or strong language, and/or suggestive themes.

Mature (M). Content may be suitable for persons 17 and older. May contain mature sexual themes.

Adults Only (AO). Content suitable only for adults. May include graphic depictions of sex and/or violence. Not intended for persons under the age of 18. (Personal communication, Marc Szafran, acting executive director, ESRB, August 26, 2002)

Content descriptors relevant to each category may accompany rating symbols on product packaging. These descriptors provide consumers with additional content information and in many instances indicate the level of violence or sexual content of the title. ESRB content descriptors include: Mild Language, Comic Mischief, Blood, Animated Blood, Blood and Gore, Suggestive Themes, Nudity, Partial Nudity, Mature Sexual Themes, Strong Sexual Content, Use of Tobacco, Use of Alcohol, Use of Drugs, Informational, Edutainment, Some Adult Assistance May be Needed (Early Childhood descriptor only). (Personal communication, Marc Szafran, acting executive director, ESRB, August 26, 2002)

Submission of material for ratings classification is on a voluntary basis. (Heistand, 1994: 2) According to the ESRB, 99 percent of all published video games are rated. (Personal Communication, Marc Szafran, acting executive director, ESRB) As part of the ratings process, software publishers submit certain content-related materials. Each product's materials are reviewed separately by three raters who are randomly selected from a pool of more than 100 specially trained individuals. The identity of all raters is kept anonymous. The raters represent a cross section of demographic groups including sex, age, ethnicity, education and marital status.

Submitted material must include a questionnaire on the game's content, as well as a videotape, demo disks, storyboards, scripts, and/or other narratives so raters can view the content of the product. Publishers are required to submit content excerpts representing the most "extreme portions" of the title, along with a full spectrum of game play. (Heistand, 1994: 7) Each rater reviews the material and gives his or her observations and ratings recommendations, including suggested descriptors from among standardized options.

All three reviews are then submitted to an ESRB staff member. ESRB staff review the three individual ratings and return a consensus rating to the publisher. The publisher can either accept or appeal

the designated classification. An appeals board comprised of persons unaffiliated with the software industry, but with relevant backgrounds, adjudicates such appeals. Prior to publication, a copy of the final product must be sent to the ESRB, where a staff member plays the game to ensure that the final product corresponds with the original submission. (Personal communication, Marc Szafran, acting executive director, ESRB, August 26, 2002)

The ESRB has several systems in place that promote publisher accountability and honesty in submitting accurate product information. Publishers are required to sign judicially enforceable affidavits attesting to the accuracy of the submitted material. (Federman, 1998) The ESRB's trademarks are registered, and the board has a range of sanctions to use against companies that fail to provide full disclosure, including requiring that products be stickered in the field, monetary fines, and/or revoking the rating. As a condition of accepting an ESRB rating, publishers must adhere to the IDSA Advertising Code of Conduct, which requires them to display the rating and content descriptor(s) on product packaging and to include the rating symbol in all electronic and print advertising, as well as in other consumer marketing material. The ESRB has also established a toll-free number for consumers to call to obtain rating information. An outside consumer and academic advisory board, whose members include representatives from the Consumer Federation of America and KIDSNET, meets periodically to advise the executive director on the system. (Entertainment Software Advisory Board, 2002)

Public Opinion on Video Game Ratings

A national survey of 800 parents of children ages 2–17, conducted by the Kaiser Family Foundation, asked whether parents “ever” used the ratings system for video games to help guide their families’ choices. The survey found that 59 percent of parents said they did use the system, while 39 percent said they did not. (Kaiser Family Foundation, 2001: 6) The survey also found that 52 percent of those who had used the video game ratings found the system “very useful,” while 41 percent said it was “somewhat useful,” with 3 percent responding “not too useful,” and 3 percent found the system “not at all useful.” (Kaiser Family Foundation, 2001: 6)

A national public opinion poll commissioned by the ESRB and conducted by Peter D. Hart Research found that 64 percent of parents are aware of the ESRB system, a 19 percent increase over two years. (Entertainment Software Rating Board, 2002b: 1) When read a description of the system, 90 percent of parents said they found it “very” or “somewhat” helpful.

Video Game Rating Policy Options

Stricter Ratings

Some critics argue that video game raters allow unacceptably violent content in games rated appropriate for children or teens. The group is especially concerned about first-person shooter games rated “Teen,” including *Commando II: Men of Courage* and *Outlaw Golf*. (Lion and Lamb Web site, 2002)

Reform Video Game Industry Marketing Practices

Some critics of the video game rating system focus less on the rating system itself, and more on the marketing and sale to children of video games that are rated by the ESRB as inappropriate for them. A national survey conducted in 2001 found that 93 percent of households “agree” or “strongly agree” that stores should prevent the sale of games rated “Mature” to minors. (Walsh, 2001b: 4) There are currently no legal restrictions on the sale or rental of adult video games to children. Some retailers require age identification and others do not; even in stores with policies requiring IDs, these requirements are not always enforced.

The Federal Trade Commission reports on “Marketing Violent Entertainment to Children,” cited above with regard to the movie and sound recording industries, also covered video game industry marketing practices. As in the case of films, the FTC studied video game industry marketing practices for products labeled potentially inappropriate for children. In its initial report, the FTC found that, of 118 video games rated “Mature” for violence selected for study, the marketing plans for 83, or 70

percent, targeted children under 17. (FTC, 2000: 45) Also, in an undercover shopper survey of 380 stores nationwide, the commission found that unaccompanied children ages 13–16 were able to purchase M-rated games (designated as “content that may be suitable for persons ages 17 and older”) 85 percent of the time.

In their one-year follow-up report, the FTC found that the industry had made “positive steps to limit ad placements (for M- and AO-rated titles) in popular teen media.” However, in their follow-up shopper survey, the percentage of children ages 13–16 who were able to purchase M-rated games was reduced only slightly, to 78 percent.

Responding to the FTC’s first report, the Interactive Digital Software Association and the Entertainment Software Rating Board expanded their program of monitoring ads, including, effective October 31, 2001, “a sliding scale of warnings, monetary penalties, and other sanctions based on the seriousness/frequency of violations.” (FTC, 2001b: 27) The industry also created new standards limiting ads for M-rated games in venues “where children constitute a certain percentage of the audience: 35 percent for television and radio and 45 percent for print and the Internet.” (FTC, 2002: 18) While praising this development, the FTC’s reports continue to suggest that the industry “further limit the use of popular teen media to advertise violent entertainment products,” using such factors as the “total number of children reached” in given advertising venues in addition to the percentage of the child- age audience in the particular venues. (FTC, 2002: 31)

Almost two-dozen members of the U.S. Congress introduced the “Protect Children From Video Game Sex and Violence Act of 2002.” (CNN.com, 2002) The act would prohibit the sale or rental of adult-rated video games (including coin-operated games) to minors. Critics of the proposed legislation argue that its enactment would involve an unconstitutional abrogation of First Amendment free speech rights. (CNN.com, 2002)

Coin-Operated Video Game Ratings

Video Arcade Parental Advisory System

In the spring of 1996, several amusement game trade organizations came together to create the Coin-Operated Video Game Parental Advisory System. (American Amusement Machine Association (AAMA), 2002) This parental advisory system is content-based and uses a color-coded, “traffic light” set of symbols to denote the differences between content.

The system utilizes a series of “disclosure messages,” which appear either in a color-coded sticker affixed to the header of the games or incorporated into the artwork on the header of the games “in a location that is readily visible to the player(s) of the game at all times.” (AAMA, 2002)

The system has nine categories of disclosure messages, as follows:

Suitable for All Ages. The content of this game is appropriate for game players of all ages.

Animated Violence—Mild. Contains scenes of violence involving cartoon-like characters in fantasy or life-like settings engaged in combative activity such as martial arts or sports activities with violent elements that do not result in bloodshed, serious injury, and/or death to the depicted character(s).

Animated Violence—Strong. Contains scenes of strong violence involving cartoon-like characters in fantasy or life-like settings that result in bloodshed, serious injury, and/or death to the depicted character(s).

Life Like Violence—Mild. Contains scenes of violence involving human-like characters engaged in combative activity such as martial arts or sports activities with violent elements that do not result in bloodshed, serious injury, and/or death to depicted character(s).

Life Like Violence—Strong. Contains scenes of strong violence involving human-like characters that result in bloodshed, serious injury, and/or death to the depicted character(s).

Sexual Content—Mild. Contains sexually suggestive references or material.

Sexual Content—Strong. Contains graphic depictions of sexual behavior and/or the human body.

Language—Mild. Contains commonly used four-letter words.

Language—Strong. Contains strong four-letter expletives. (AAMA, 2002)

The color scheme for the messages is as follows: the Suitable for All Ages disclosure message is colored green; all three “mild” messages are colored yellow; and all “strong” messages are colored red.

The designation of the disclosure messages are determined by the manufacturer and/or developer of each game, using specific written guidelines provided by the American Amusement Machine Association. The guidelines pose a series of questions that help the raters decide which labels to associate with a given game. For example, under the violence rating category, two of the guidance questions are as follows:

5. Does this game contain scenes involving human-like characters engaged in combative activity, which results in bloodshed, serious injury, and/or death to depicted character(s)? If YES, this game should have a Disclosure Message of “Life-Like Violence—Strong”; skip questions 6–8 and fill in the appropriate Disclosure Message in Section III. If NO, proceed to question #6.

6. Does this game contain scenes involving human-like characters engaged in combative activity such as martial arts or sports activities with violent elements that do not result in bloodshed, serious injury and/or death to the depicted character(s)? If YES, this game should have a Disclosure Message of “Life-Like Violence—Mild”; skip questions 7–8 and fill in the appropriate Disclosure Message in Section III. If NO, proceed to question #7. (AAMA, 2002)

Criticisms of the Parental Advisory System

Not All Games and/or Arcades Use the Ratings

The National Institute on Media and the Family has produced a series of reports on the use of ratings and labels for video games. In 2001, after monitoring seventeen arcades in six states, the study found that 71 percent of games displayed the ratings, down from 80 percent in 2000. (Walsh, 2001b: 4)

Coin-Operated Video Game Policy Options

Alternatives to Ratings

As an alternative to ratings, almost two-dozen members of the United States Congress introduced the “Protect Children From Video Game Sex and Violence Act of 2002.” (CNN.com, 2002) The act would prohibit the sale or rental of certain video games (including coin-operated games) to minors.

Policy Options for Media Ratings Reform

In this section, five policy options for reform of media rating systems will be considered. These options are as follows:

- the creation of a universal media rating system;
- the creation of an independent committee or agency to oversee media rating systems in the United States;
- the abolition of media rating systems;
- the institution of content-based rating systems;
- requirement of an “open” standard for the V-chip in digital televisions.

Proposal for a Universal Rating System

In July 2001, a coalition of public health organizations, leading media researchers, and children’s advocacy organizations sent a letter to congressional leaders proposing changes to existing media rating systems. The coalition included the American Medical Association, the American Psychological Association, Children Now, and the National Institute on Media and the Family (which coordinated the effort). The letter critiqued current media rating systems as being insufficiently “health based,” and proposed several general reforms of the entire media rating system in the United States. (Walsh, 2001: 3) One of these proposed reforms was the creation of a universal media rating system. Specifically, the proposal suggested that a “universal media ratings system should be developed by industry representatives, child development experts, and child advocates to be easily understandable, reliable, and valid. It should also include both age-based and content-based information.” (Walsh, 2001: 3)

The primary argument for the creation of a universal rating system, as presented by the coalition, is that the existence of multiple rating systems for media makes it difficult for parents to decipher what is appropriate viewing material for their children. As the coalition letter states, “(T)he same media product that included extreme violence would be rated R if it were a movie, TV-MA if it were a TV show, M if it were a home video game, it would have a red sticker if it were a video game in an arcade, and would have a ‘Parental Advisory’ sticker if it were a music CD. This alphabet soup of ratings is confusing to parents, undercutting the value of the ratings systems.” (Walsh, 1991: 2–3)

Though endorsed by media experts and public health advocates, the idea of a universal rating system has not been uniformly embraced by the general public. When asked in a national poll whether a universal rating system would be more or less useful than the currently available media rating systems, parental reactions were mixed. While 40 percent said that such a system would be “more useful” than the current rating systems, 38 percent said that a single rating system “wouldn’t make much difference,” and 17 percent believed that a universal rating system would be “less useful” than the current rating systems. (Kaiser Family Foundation, 2001: 7)

Several arguments have been put forward by media industry leaders against the proposal for a universal rating system. First, industry leaders argue that existing rating systems are already relatively well understood and considered useful by parents. As stated by National Association of Broadcasters President Edward Fritts and National Cable and Telecommunications Association President Robert Sachs, the institution of a new, universal, media rating system would “undermine parents’ current familiarity with existing rating systems.” (Sachs and Fritts, 2001: 1) Such familiarity has been built over a period of years, they suggest, and any new system would forfeit educational gains regarding existing rating systems.

Second, industry leaders argue that the television rating system’s links to current V-chip blocking technology make adoption of a universal system unfeasible. As MPAA President Jack Valenti stated, “(t)he V-chip circuitry in the TV sets is fastened irretrievably to the current TV rating symbols. If you change those symbols, you instantly destroy the V-chip because the TV set is incapable of adapting to new symbols.” (Valenti, 2001a: 4) National Cable and Telecommunications Association President Robert Sachs and National Association of Broadcasters President Edward Fritts similarly argue that changes to the rating system would “obsolete the millions of television sets that have been sold equipped with V-chip.” (Sachs and Fritts, 2001: 2)

A third argument against a universal media rating system has been posed by Recording Industry Association of America President Hilary Rosen. As noted above, Rosen argued that the subjective nature of interpreting words makes it impossible to create a rating system for music lyrics. Since music lyrics are inherently unratable, she argued, it follows that it would be impossible to institute a universal rating system that includes music lyrics. (Rosen, 2001: 110)

Proposal for an Independent Ratings Oversight Committee

A second proposal put forth by the coalition of media researchers, advocates and public health organizations cited above is the “creation and implementation of an independent ratings oversight committee that monitors media ratings for accuracy and maintains standards in all media.” (Walsh, 2001: 3)

Interestingly, survey research shows that a plurality of parents believe that such an agency already exists and is in charge of applying ratings to television programs. When asked “who decides what a TV show’s rating should be” under the current system, 34 percent of parents said that “an independent review board” applies the ratings, and only 24 percent said that “the TV industry itself” applies the ratings, which is in fact the case. (Kaiser Family Foundation, 2001: 12)

The proposal for an independent rating agency has been criticized on grounds of impracticability. MPAA President Jack Valenti has argued that the sheer number of media products created each year would make the task of such an agency impossible: “Some 650 films are rated each year. There are 2,000 hours a day of TV programming, the equivalent of 1,000 movies every day! The music industry produces some 40,000 releases each year. The video game industry published approximately 1,300 computer and video games in 2000.... How would an oversight committee monitor this avalanche of material unless it had a thousand eyes and expanded the day to a hundred hours?” (Valenti, 2001a: 4) On the other hand, as media researcher Dale Kunkel has stated, the same argument was advanced by the television industry when the idea of a TV rating system was first proposed, and those logistical difficulties were eventually overcome. (Kunkel, 2001: 77)

Abolition of Media Rating Systems

Civil liberties advocates, as well as many members of the entertainment industry, have argued through the years that all media rating systems constitute a form of censorship, and are therefore fundamentally incompatible with the principles of free speech and should be abolished. For example, the American Civil Liberties Union (ACLU) has a long-standing policy opposing all forms of media ratings, whether they are sponsored by government or private industry. (American Civil Liberties Union [ACLU], 1987: passim) For the ACLU, industry rating systems can have the same substantive constraint on the marketplace of ideas as government rating systems. In addition to constraining the freedom of artists, the ACLU contends, ratings that carry with them restrictions on viewing media (such as the MPAA’s R or NC-17 ratings) interfere with the “autonomy of the family,” the ability of parents to be arbiters of their children’s viewing choices. They cite a Michigan legal suit in which a parent sued a movie theater when he was unable to have his child see the R-rated movie *Animal House* with his permission but without his presence; the parent lost the suit. (ACLU, 1987: 42a) According to Harvard Law professor Alan Dershowitz, such restrictions amount to de facto censorship: “Every other rating is designed to give parents knowledge, but if I have a 15-year-old, and I think, as a parent, that the movie is appropriate for that 15-year-old, I am precluded from making that decision.” (quoted in *E!* Online, 2002)

A second argument for the elimination of rating systems concerns virtual or commercial censorship. Critics of the MPAA’s NC-17 rating have asserted that the label amounts to virtual censorship because many exhibitors refuse to book the films, many newspapers won’t allow advertising for them, and some leading video chains refuse to carry NC-17 films. (Klady, 1994) For example, Blockbuster Video, Kmart and Wal-Mart, which together account for more than half of all video sales in the United States, will not stock NC-17 videos. (Grimes, 1992; McMillon, 2001: 103) Showtime Networks, which operates the cable television networks Showtime, the Movie Channel, and FLIX, will not accept NC-17 films on its services. (Biondi, 1993: 6) Similarly, Wal-Mart does not carry video games rated AO (Adults Only) or sound recordings with parental advisory stickers. (McMillon, 2001: 103)

Such commercial restrictions can have the result of causing artists to alter their forms of expression to avoid the commercial limitations caused by restrictive ratings. Filmmakers, desiring release of their pictures in the largest possible number of theaters, are therefore “desperate to receive a rating no more restrictive than R...and will often re-cut and re-cut an NC-17 movie to make it an R.” (Bruck, 2001: 56) Further, as noted above, many music artists release versions of their songs that are edited to remove references that trigger parental Advisory warnings in order to enable the distribution of their CDs in outlets such as Wal-Mart.

A third argument for the abolition of ratings concerns the specific circumstances surrounding the creation of the TV rating system. It has been argued that since the V-chip and the TV rating system were created as a result of federal law, they are both unconstitutional breaches of First Amendment rights and therefore should be repealed. According to the Cato Institute, the Telecommunications Act of 1996, which mandated a television rating system and installation of V-chip technology in television sets, should be considered unconstitutional because it “has one central purpose: to discourage the viewing of programming with a certain type of content.” (Cato Institute, 2002)

A final line of reasoning against media ratings is that they constitute one step down a “slippery slope” toward broader governmental censorship. For example, without extant media rating systems, the Federal Trade Commission would not have been able to measure whether media companies are marketing to minors products designated by such systems as potentially inappropriate for them. In turn, the FTC report led U.S. Senator Joseph Lieberman (D-CT) to propose the Media Marketing Accountability Act of 2001, which would empower the FTC to fine those media companies that rate their products unsuitable for children and then market those products to minors. (Bash, 2001) The proposed law has been described by MPAA president Jack Valenti as a “frontal attack on the Constitution.” (Valenti, 2001b: 118)

The Descriptive Ratings Option

A recurrent theme in discussions of media rating system reform is that current systems should be altered to include more content information, or that they should eliminate age-based ratings altogether in favor of a solely content-based rating approach.

The primary argument for such reform is that, when given a choice, parents have been shown to consistently prefer content-based rating information to age-based ratings. During the period prior to the creation of the TV rating system, a series of national surveys asked parents whether they would prefer an age-based or content-based rating system. Five out of six polls conducted from August 1996 through March 1997 found majorities ranging from 62 percent to 80 percent preferring content-based ratings. (Cantor, 2001: 838) The one survey showing a majority (54%) in favor of an age-based system was commissioned by the Ratings Implementation Group itself. (Cantor, 2001: 838) More recently, a 2001 poll asked parents which element of the current TV rating system provides the “most useful information for parents like you.” Fifty-five percent of parents said that the content-based aspect of the ratings were most useful, while 18 percent said that the age-based rating information was most useful. (Kaiser Family Foundation, 2001: 12)

A Federal Trade Commission national poll of parents found that parents, though approving of media rating systems generally, were more divided when asked whether the systems did a “good or excellent” or “fair or poor” job of informing them about violence. (FTC, 2000, Appendix F: 9) The system that scores the highest in this poll question—the video game system—is the one that provides the most systematic content descriptions. (See Table 1)

In sum, when given a choice, parents generally prefer content-based rating systems to age-based rating systems; they find content-based information in existing rating systems more useful than the age-based viewing prescriptions of those systems; and they are less than satisfied that current rating systems do a good job of providing content information about violence.

Table 1: (FTC, 2000, Appendix F: 9)

	Movies	Music	Games
% of aware, familiar parents saying good or excellent	48	44	55
% of aware, familiar parents saying fair or poor	50	40	29

There are several other arguments for preferring content-based rating systems over age-based ones. First, some argue that age-based ratings are less likely to be consistently applied than descriptive ratings. Age-based ratings combine different categories of behavior—violence, sex/nudity, profanity—into ratings such as “G” or “R.” By contrast, descriptive ratings can be more consistently applied, since the level of judgment is lower and simpler to apply, i.e., whether or not certain depictions occur in a given story or game.

Second, some argue that age-based ratings are less reliable as a source of information for those making media consumption choices. Age-based ratings make judgments regarding the relative appropriateness of such factors as violent, sexual, or linguistic content. In contrast, by providing specific content information, descriptive ratings allow sometimes very different consumers to make media consumption choices appropriate to their personal values and preferences.

Finally, it could be argued that descriptive ratings are less likely than age-based ones to be misinterpreted as prescribing a value system for society. All media ratings run the risk of assuming a moralistic tone. The simple act of “rating” a behavior can imply that it may be socially undesirable in some way. This is of particular concern regarding the proposal for creation of a universal rating system. The more universalized a rating system, the more it runs the risk of appearing to represent semi-official values for the society as a whole.

On the other hand, it could be argued that the political effect of age-based ratings may be the best defense against censorship. By “protecting” children from certain materials, age-based ratings free adults to view or interact with whatever media content is rated “adult only.” In any society, there will always be those who appoint themselves as scolds and censors. If age-based ratings gave way entirely to content-based ones, then such individuals and groups might forever be tempted to ban the more extreme end of any content-based ratings categories (such as violence, sex, or language). As a result, whether in the name of protecting children or society, certain material would be banned for everyone.

The “Open” V-chip Option

For advocates of media rating system reform, the current period is a crucial one in terms of ensuring the technical feasibility of any future rating system changes. As noted above, entertainment industry officials have claimed that proposals for restructuring the rating system for television or for the creation of a universal rating systems are unfeasible because TV ratings are wedded to a V-chip technology that is only capable of interpreting existing ratings and incapable of alteration. Thus, as TV industry leaders argue, changes to the TV ratings would make “obsolete the millions of television sets that have been sold equipped with the V-chip.” (Sachs and Fritts, 2001: 2)

A crucial assumption in the industry leaders’ claim is that V-chip technology is permanently fixed or “closed” with regard to the type of rating system it is able to interpret. A “closed” V-chip system can block programs only according to a fixed number of rating systems. For example, most current V-chip technology in television sets can only interpret and use two rating systems to block TV shows: the TV Parental Guidelines and the MPAA rating system.

However, “open” V-chip technology also exists. Such technology—currently available in both analog and digital TV sets manufactured by Sharp, Hitachi, and Pioneer—is capable of interpreting a larger range of rating systems and can also adapt to changes to existing rating systems. (Collings, 2002) This open V-chip capability can allow television programmers, by transmitting new information electronically, to re-program the V-chips in those TV sets to accept new rating systems or changes to existing ones. This re-programming of the V-chip can also reconfigure the V-chip blocking technology screen that the television owner then uses to program their television sets. The consumer can then block programs according to the new or revised rating system.

The Federal Communications Commission, in its 1998 ruling regarding the implementation of V-chip technology in analog sets, expressed a preference for open V-chip technology but did not require it:

(W)e prefer an open, flexible approach to the development of industry standards and regulations that would accommodate the possible development of multiple rating systems. Although we are not mandating that TV receiver manufacturers provide for alternative rating systems, we encourage manufacturers to design TV receivers to provide for additional rating systems to the extent practical.... We believe that certain basic functions are essential to fulfill the objectives of the 1996 Act and to ensure the successful implementation of program blocking technology. We do not find it necessary to regulate other aspects of TV receiver design with regard to program ratings, such as security features, or the ability to display ratings upon demand. Manufacturers have every incentive to design their receivers to best meet consumers needs and offer unique combinations of display and functionality that will differentiate their products from competitors. (FCC, 1998)

The FCC has not yet set technical standards for the V-chip for digital TV. Without public action to promote an “open” design, it is likely the Commission would adopt the same standard for digital as it did for analog TV.

The rollout of digital TV technology over the next few years is a critical time period for preserving the option of future reforms to the television rating system, as well as the related potential for a universal rating system across media. At present, approximately one percent of the 265 million television sets in the United States are digital. (Ahrens, 2002) On August 8, 2002, the Federal Communications Commission required that all new television sets with 36” or larger screens sold in the United States must have digital tuners by July 1, 2005, and that new, smaller TVs must be digitally equipped by July 1, 2007. (Ahrens, 2002) Additionally, Congress has mandated by law that television broadcasters no longer send analog signals as of December 31, 2006. (Ahrens, 2002) These developments, along with the dropping price of digital televisions, are likely to lead consumers to accelerate purchase of new, digital television sets over the next several years.

The rollout of digital television offers an opportunity to institutionalize open V-chip technology as the industry standard. If the technical standard for the V-chip in digital TV sets were to require open technology, future rating system reform would be possible. However, if the new generation of digital television sets is rolled out with predominantly closed V-chip technology, then the current TV rating regime will be permanently fixed.

Standards for V-chip technology are set by the Electronic Industry Association (EIA), a television manufacturers’ trade group. More specifically, such decisions are made by the EIA’s Television Data Systems Subcommittee (TDSS). The TDSS has created two technological standards for the digital television V-chip, one that is open and one that is closed. However, per FCC requirements, the TDSS only requires implementation of the closed technology; use of the open technology is optional. [According to Tim Collings, the engineer who designed the V-chip, open V-chip technology is provided for in the Electronic Industry Association’s ATSC A/65-A PSIP standard; the closed standard is EIA-744A. (Tim Collings, personal communication, June 6, 2002)] This decision effectively forecloses the possibility of a universal rating system, or *any* TV rating system reform. If this remains the case, entertainment industry officials will always be able to argue, as they can today, that changes to the rating system will make “obsolete” the V-chip resident in the majority of television sets.

Some argue that to categorically preclude the possibility of ratings reform would be imprudent. History has already shown that as times, standards, and technologies change, there is often a need for reform of media rating systems as well. For example, over the years, the movie rating system has eliminated the X rating, added the PG-13 and NC-17 ratings, and has begun to include ratings reasons in their advertisements. Even in the short life of the TV Parental Guidelines, the system has been reformed to introduce the V, S, and L descriptor categories. Further, as media converge, new reasons for rating reform will likely arise.

To ensure open V-chip technology—and therefore the possibility of any future TV ratings reforms or additions—either the Federal Communications Commission or the U.S. Congress would need to mandate an open V-chip system, just as it currently is legally mandatory that all V-chips be able to interpret the TV Parental Guidelines and the MPAA rating system.

References

- ABC Family. (2002, July 26). (videotape) On-Air Advisories. Los Angeles: ABC Family.
- Ahrens, Frank. (2002, August 8). FCC Votes to Require Digital Tuners on All TV Sets by 2007. www.washingtonpost.com.
- American Amusement Machine Association. (2002). Coin-Operated Video Game Parental Advisory System. Retrieved June 20, 2002, from www.coin-op.org/pas.htm.
- American Civil Liberties Union. (1987). "Policy Number 18: Rating Systems Sponsored by the Communications Industries," American Civil Liberties Union Policy Manual. Washington, D.C.: American Civil Liberties Union.
- The Annenberg Public Policy Center. (2000). Media in the Home 2000: The Fifth Annual Survey of Parents and Children. Philadelphia, PA: The Annenberg Public Policy Center.
- Bash, Dana. (2001, April 26). Bill Seeks to End Marketing Adult Music to Children. CNN.com.
- Bickham, David S., and John C. Wright. (2001). "Television Rating and the Viewing Preferences of Children: A Comparison of Three Systems." Poster Presentation at the 2001 Biennial Meeting of the Society for Research in Child Development. Austin, TX: University of Texas.
- Bing, Jonathan. (2001, August 5). Indie Figures Wage Battle Over Ratings. Variety.com.
- Bruck, Connie. (2001, August 13). The Personal Touch. The New Yorker.
- Biondi, Frank. (May 21, 1993). Testimony Before the Senate Judiciary Subcommittee on the Constitution. Washington: U.S. Government Printing Office.
- Boliek, Brooks. (1997, July 25–27). NBC Steps Up TV Advisories. Hollywood Reporter.
- Cantor, Joanne. (1977, April 7). Letter of Comment to Federal Communications Commission.
- Cantor, Joanne, Kristen Harrison, and Amy Nathanson. (1998). Ratings and Advisories for Television Programming. National Television Violence Study Volume 2 (pp. 269–322). Thousand Oaks, CA: Sage Publications.
- Cantor, Joanne. (2001). Ratings for Television Programs. In J. Schement (ed.) Encyclopedia of Communication and Information. Vol. 3. New York, NY: Macmillan Reference USA.
- Cato Institute. (2002). Cato Handbook for Congress: Broadcasting. Washington, D.C.: Cato Institute. Retrieved June 6, 2002, from <http://www.cato.org/pubs/handbook/hb105-20.html>.
- Center for Communication and Social Policy. (1996–1998) National Television Violence Study, Vols. 1-3. Thousand Oaks, CA: Sage Publications.
- Center for Media Education and the Henry J. Kaiser Family Foundation, A Parent's Guide to the TV Ratings and V-Chip. Retrieved July 24, 2002, from <http://www.vchippeducation.org/pages/using.html>
- Children's Protection Act of 2001, S. 124, 107th Cong., 1d Sess. (2001).
- Christenson, Peter. (1992). The Effects of Parental Advisory Labels on Adolescent Music Preferences. Journal of Communication, 42 (1), 106–113.

Committee on Governmental Affairs, United States Senate. (2001, July 25). Rating Entertainment Ratings: How Well are They Working For Parents and What Can Be Done to Improve Them. 107th Cong., 1st Sess.

CNN.com. (2002, May 9). Move to outlaw sales of NC-17 games to minors. CNN.com.

Directors Guild of America. (2001, July 25). Statement of the Directors Guild of America Before the Committee on Governmental Affairs, United States Senate. In Committee on Governmental Affairs, United States Senate. Rating Entertainment Ratings: How Well are They Working For Parents and What Can Be Done to Improve Them. 107th Cong., 1st Sess.

Donnerstein, Ed, Ron Slaby, and Leonard Eron. The Mass Media and Youth Aggression. Washington: American Psychological Association, 1993.

E! Online. Why Ratings Suck. E! Online. Retrieved June 18, 2002, from <http://www.eonline.com/Features/Specials/Ratings/?hot.specials>

Entertainment Software Rating Board. ESRB Video and Computer Game Ratings., Retrieved June 18, 2002, from http://www.esrb.org/esrb_about.asp.

Entertainment Software Rating Board. (2002, July 1). (Press Release) Study Shows Most Parents Use Video Game Rating System. New York: Entertainment Software Rating Board.

Federal Communications Commission. (1998, March 12). FCC 98-36 Report and Order. Washington, D.C.: Federal Communications Commission.

Federal Trade Commission. (2000). Marketing Violent Entertainment to Children: A Review of Self-Regulation and Industry Practices in the Motion Picture, Music Recording, & Electronic Game Industries. Washington, D.C.: Federal Trade Commission.

Federal Trade Commission. (2001a). Marketing Violent Entertainment to Children: A Six-Month Follow-Up Review of Self-Regulation and Industry Practices in the Motion Picture, Music Recording, & Electronic Game Industries. Washington, D.C.: Federal Trade Commission.

Federal Trade Commission. (2001b). Marketing Violent Entertainment to Children: A One-Year Follow-Up Review of Self-Regulation and Industry Practices in the Motion Picture, Music Recording, & Electronic Game Industries. Washington, D.C.: Federal Trade Commission.

Federal Trade Commission. (2002). Marketing Violent Entertainment to Children: A Twenty-One Month Follow-Up Review of Industry Practices in the Motion Picture, Music Recording, & Electronic Game Industries. Washington, D.C.: Federal Trade Commission.

Federman, Joel. (1996). Media Ratings: Design, Use and Consequences. Studio City, CA: Mediascope.

Federman, Joel (ed.). (1997). National Television Violence Study, Volume 2: Executive Summary. Santa Barbara: University of California, Santa Barbara Center for Communication and Social Policy.

Federman, Joel. (1998). Media Rating Systems: A Comparative Review. In Monroe Price (ed.), The V-Chip Debate: Content Filtering from Television to the Internet. Mahwah, NJ: Lawrence Erlbaum.

Fleming, Heather. (1997, May 26). Ratings Fail to Score in Peoria. Broadcasting and Cable.

Fox Family Channel. (2001). (Press Release). Fox Family Channel Launches Customized On-Air Advisories to Further Enhance V-Chip Rating System. Los Angeles, CA: Fox Family Channel.

Grimes, William. (1992, November 30). Reviewing the NC-17 Film Rating: Clear Guide or an X by a New Name? *New York Times*.

Heistand, Jack. (1994, July 29). Testimony Before the Senate Subcommittee on Regulation and Government Information and the Senate Subcommittee on Juvenile Justice.

Hollings, Fritz. Senator Fritz Hollings from South Carolina: Issues and Legislation. Retrieved August 8, 2002, from www.senate.gov/~hollings/issues.html#telecom.

Kaiser Family Foundation. (2001). *Parents and the V-Chip 2001: A Kaiser Family Foundation Survey*. Menlo Park, CA: Henry J. Kaiser Family Foundation.

Kennedy, Louise. (2002, June 30). *The Rating Game*. *Boston Globe*.

Kunkel, Dale; Wendy J.M. Farinola; Kirstie M. Cope.; Edward Donnerstein.; Erica Biely; and Lara Zwarun. (1998). *Rating the TV Ratings: One Year Out; An Assessment of the Television Industry's Use of V-Chip Ratings*. Menlo Park, CA: Henry J. Kaiser Family Foundation.

Kunkel, Dale. (2001). Testimony Before the Committee on Governmental Affairs, United States Senate. Washington, D.C.: U.S. Government Printing Office.

Klady, Leonard. (1994, May 3). "Why Fears of B.O. Restrictions are Not So Crazy." *Daily Variety*.

Leff, Leonard J. and Jerold L. Simmons. (1990). *The Dame in the Kimono: Hollywood, Censorship, and the Production Code from the 1920s to the 1960s*. New York, NY: Grove Weidenfeld.

Lion and Lamb Project. (2002). *Lion and Lamb Links*. Retrieved August 25, 2001, from www.lionlamb.com.

McMillon, Doug. (2001, July 25). Testimony Before the Committee on Governmental Affairs, United States Senate. In *Committee on Governmental Affairs, United States Senate. Rating Entertainment Ratings: How Well are They Working For Parents and What Can Be Done to Improve Them*. 107th Cong., 1st Sess.

Morkes, John, Helen L. Chen, and Donald F. Roberts. (1997). *Young Adolescents' Responses to Movie, Television, and Computer Game Ratings and Advisories*. Paper Presented to the Mass Communication Division of the International Communication Association. Palo Alto, CA: Stanford University Institute for Communication Research.

Moss, Linda. (2002, February 12). *Fox Family to Add V-Chip Aids*. *Multichannel News*.

Motion Picture Association of America. (2001, July 25). *Initiatives of MPAA Member Companies, September 26, 2000*. In *Rating Entertainment Ratings: How Well are They Working For Parents and What Can Be Done to Improve Them*. Washington, D.C.: U.S. Government Printing Office.

Recording Industry of America. (1995). (press release) *Recording Industry Responds to Concerns About Music Lyrics—Announces Enhanced Parental Advisory Program*. Washington: Recording Industry Association of America.

Recording Industry of America. (2001). (press release) *Recording Industry Association of America Enhances Parental Advisory Program*. Washington: Recording Industry Association of America.

Recording Industry of America. (2002). *RIAA Parental Advisory Program Guidelines*. Washington, D.C.: Recording Industry Association of America.

Rosen, Hilary. (2001, July 25) Testimony Before the Committee on Governmental Affairs, United States Senate. In Committee on Governmental Affairs, United States Senate. Rating Entertainment Ratings: How Well are They Working For Parents and What Can Be Done to Improve Them. 107th Cong., 1st Sess.

Ross, Matthew. (2001, November 6). Pix Finding Nice Under the Radar: B.O. Results Show Unrated Market Thriving. Variety.com.

Sachs, Robert and Eddie Fritts. (2001). Letter to David Walsh, President, National Institute on Media and the Family.

Schmitt, Kelly. (2000). Public Policy, Family Rules and Children's Media Use in the Home. Philadelphia, PA: Annenberg Public Policy Center of the University of Pennsylvania.

Sylvester, Sherri. (1999, August 23). MPAA Ratings System Gets 'F' From Critics, Filmmakers. CNN.com.

Szymanski, Mike. (2002, April 26). Not Much Slashed from 'Jason.' San Francisco Chronicle.

Tierney, Randall. (2002, April 23–29) Ratings Wars. Hollywood Reporter.

Valenti, Jack, Decker Anstrom, and Eddie Fritts. (1977, September 10). Letter to William F. Caton, Secretary, Federal Communications Commission. Retrieved August 7, 2002, from www.fcc.gov/vchip/revprop.pdf.

Valenti, Jack (1991). The Voluntary Movie Rating System: How It Began, Its Purpose, The Public Reaction. New York, NY: Motion Picture Association of America.

Valenti, Jack. (2001a). Letter to David Walsh, President, National Institute on Media and the Family.

Valenti, Jack. (2001b, July 25). The Film Industry's Voluntary Movie Rating System and Why It Has Endured + The FTC's First and Second Reports, and How the Movie Industry Responded to the First and How It Was Treated by the Second + Why the Proposed Media Marketing Accountability Act Treads Heavily on the Spine of the U.S. Constitution: A Factual Catalogue Offered to the Governmental Affairs Committee of the United States Senate. In Committee on Governmental Affairs, United States Senate. Rating Entertainment Ratings: How Well are They Working For Parents and What Can Be Done to Improve Them. 107th Cong., 1st Sess.

Valenti, Jack. (2002). Voluntary Movie Rating System: How It Works. Retrieved August 13, 2002, from <http://www.mpa.org/movieratings/about/index.htm>.

Walsh, David, et. al., (2001, June 19). Letter to Congressional representatives. Minneapolis, MN: National Institute on Media and the Family.

Walsh, David. (2001b). 6th Annual Video and Computer Game Report Card. Minneapolis: National Institute on Media and the Family.

Waxman, Sharon. (2001, April 8). Rated S for Secret. [www.washington Post.com](http://www.washingtonpost.com).

www.filmratings.com. (2002). Retrieved August 7, 2002, from <http://www.filmratings.com>.



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