



Timothy F. Winter, President
707 Wilshire Blvd., Suite 2075, Los Angeles, CA 90017
Tel: (213) 403-1305 • Fax: (213) 403-1350
Email: twinter@parentstv.org • www.parentstv.org

*The nation's most influential advocacy organization
protecting children against sex, violence and profanity in entertainment*

February 24, 2020

Michael Powell
President and CEO
The Internet & Television Association
DBA TV Parental Guidelines Monitoring Board
25 Massachusetts Avenue, NW - Suite 100
Washington, DC 20001

Dear Michael:

Thank you for sending me a copy of the Monitoring Board's first-ever Annual Report, along with your cover letter. I share with you an appreciation for our continued dialogue on this important matter. As you know, the PTC's mission is to protect children from the graphic sex, violence and profanity that is so pervasive in today's entertainment media environment; and a content rating system that is accurate, consistent, transparent and publicly accountable is strategic to that mission.

While I appreciate whatever volume of effort that went into the Report's production, I am profoundly disappointed by the woefully inadequate output. If the objective was to produce a report, then you succeeded; but if the objective was to help parents to be better parents, then sadly you've failed.

The TVOMB had more than eight months to implement meaningful reforms that would demonstrate to parents the Board's commitment to improving the ratings system and its oversight. Instead, according to your Annual Report, the Board has:

- Redesigned its logo.
- Redesigned a website that most Americans have never heard of, and reconnected a phone line that nobody knows exists.
- Booked one of its Board members on a single low-profile podcast, hosted by an obscure, broadcast industry-controlled group that fails to mention on its own website anything about the ratings system or that it is a TVOMB member. (Why, instead, wouldn't Elizabeth Casey appear on one of her numerous Fox Network outlets? For that matter, there appears not to have been one single on-air promotional effort by *any* of the *scores* of television networks owned by TVOMB members!)
- Released a press release and tweeted about its Annual Report, but generated a grand total of zero articles or news stories that parents would see or hear about.
- Failed to engage with anyone but its own members (except for one video game industry representative).
- Reiterated the same hollow talking points made by the TVOMB's lawyers in its filings with the FCC last spring.

Michael, I'm not saying the Report has no value. I've personally managed a booth at a national PTA convention in prior years, and it is great that their executive director is a member of TVOMB. But spot checks conducted by industry employees to confirm the accuracy of industry opinion is hardly a material improvement. And I note on page 15 that "[t]he Monitoring Board continues to believe that TV ratings overwhelmingly are being applied on an accurate and consistent basis." If TVOMB does not see a problem, they are unlikely to find remedies. In all candor, the Report smacks of something that was done to assuage regulatory scrutiny rather than to improve upon a system that was created before Netflix and iPhones were even invented.

Here's what the Annual Report did not say:

- 1) What is the Board doing to address the many legitimate concerns raised in the public comments filed with the FCC during its review last spring?
- 2) What steps is the Board taking to ensure greater representation within its ranks of non-industry voices? (Two of the five "public interest" groups on TVOMB are controlled by industry executives.)
- 3) How can a robust, uniform content rating system be applied effectively across the digital platforms where children increasingly consume their entertainment programming?
- 4) Who, outside of the entertainment industry, has the Board consulted to seek guidance on how to make the ratings more helpful to parents?

So, I reiterate what I said to you in my letter dated November 12, 2019: **We are publicly calling for the TVOMB to be disbanded and reconstituted to better represent the interests of children and families. We are also calling on Congress to conduct a bipartisan, bicameral fact-finding hearing or symposium of pediatricians, children's mental health experts, and child/family advocates to review the definitions of each age-based content rating in order to ensure that each rating category definition accurately and effectively reflects contemporary knowledge and international best practices.**

I understand and appreciate that your "first" Annual Report cannot provide a panacea for each and every issue of concern. But it is hard for those who have committed their professional lives to protecting children from age-inappropriate entertainment to view the Report with anything but discontent.

As always, I remain ready, willing and able to engage with you, with TVOMB and with our elected and appointed public servants on this important matter. Because our Children are Watching.

Sincerely,



Timothy F. Winter
President, Parents Television Council

Cc: FCC Chairman and Commissioners
Charles H. Rivkin, MPA
Gordon H. Smith, NAB
Hon. James Lankford, United States Senate