

Report on a Classification System for Violence in Television Programming to be used in conjunction with V-chip Technology

Report to the Canadian Radio-television and Telecommunications Commission
from the Action Group on Violence on Television (AGVOT), April 30, 1997
Reprinted with permission

INDEX

INTRODUCTION
EXECUTIVE SUMMARY
MEETING THE REQUIREMENTS OF CRTC PUBLIC NOTICE 1996-36
A CLASSIFICATION SYSTEM FOR VIOLENT CONTENT
ROLE OF THE CANADIAN BROADCAST STANDARDS COUNCIL
A COMPREHENSIVE CLASSIFICATION SYSTEM
CLASSIFICATION SYSTEM – CONSUMER RESEARCH
CONSULTATIONS
THE 1997 FIELD TRIAL
TECHNICAL ISSUES
BROADCASTER TECHNICAL ISSUES
QUEBEC RATING SYSTEM
THE AMERICAN SITUATION
SUMMARY AND CONCLUSIONS

INTRODUCTION

The Action Group on Violence on Television (AGVOT) is pleased to submit this report to the Canadian Radio-television and Telecommunications Commission, in response to CRTC Public Notice 1996-36 *"Respecting Children – A Canadian Approach to Helping Families Deal with Television Violence,"* and Public Notice 1996-134, *"Revised Timetable for the Implementation of the Television Program Classification System and V-chip Technology."*

This report is the culmination of more than a year's work, representing an unprecedented co-operative undertaking strongly supported by all elements of the Canadian broadcast industry: over-the-air television services, both private and public, English and French; the cable industry; specialty and pay services; the independent film and television production industry, and the advertising industry.

In Public Notice 1996-36, the CRTC detailed its expectations of the Canadian broadcast and cable industries, in regards to "protecting children from the harmful effects of television violence while preserving freedom of expression for creators and choice for adult viewers."

The Commission said that by September 1996, Canadian broadcasters would be responsible for applying a classification system for violent content to children's programming, drama programs, "reality shows" (reality-based dramatic programs), and feature films, as well as promotional spots for any of these types of programs and advertisements for theatrical releases. At the same time, Canadian cable companies and other distributors would be required to make V-chip technology available to any subscriber who wanted it.

The CRTC assigned the responsibility of developing the rating system to AGVOT, with the direction that input should be sought from the public, programmers and distributors.

As it became apparent that the September 1996 objective could not be met, on July 31, 1996, AGVOT requested additional time for the development of a classification system and the introduction of V-chip technology. The Commission requested a full report by Sept. 6, detailing the reasons for the extension request and with a firm commitment for a revised timeline. AGVOT complied, and on Oct. 4, 1996, the CRTC issued PN 1996-134, in which it established a new implementation date of September 1997 for program classification and V-chip rollout.

Over the following pages, AGVOT will describe how the Classification System which it is recommending to the Commission was developed. We will report on the consultative process, in which we sought the views of the Canadian public at large, and of organizations concerned about the issue of violence on television and its effects on children, on the proposed Classification System. We will also report on progress in resolving the technical issues AGVOT brought to the Commission's attention in its report of Sept. 6, 1996, and which were part of the 1997 V-chip field trial, the largest of its kind in the world.

EXECUTIVE SUMMARY

- In Public Notice 1996-36, the Canadian Radio-Television and Telecommunications Commission designated The Action Group on Violence on Television (AGVOT) to develop a simple, parent-friendly rating system for violence in television programming which would be compatible with V-chip technology.
- In a subsequent Public Notice, 1996-134, the CRTC approved AGVOT's request for a one-year extension to the original implementation date of

September 1996, based on the need for four major technical issues to be dealt with before the classification system and V-chip could be successfully launched.

- The Commission required AGVOT to submit its proposed classification for approval by April 30, 1997.
 - AGVOT is filing a seven-level classification system for use by over-the-air broadcasters and specialty services, for violent content in children's programming, drama programs, "reality shows" (reality-based dramatic programs), and feature films. The system is informative, user-friendly, and fulfils the mandate assigned to it by the CRTC.
 - The broadcast industry is proposing to exceed the expectations of the CRTC by implementing a comprehensive Canadian Television Rating System which will include other content elements in addition to violence, in order to assist parents in making informed viewing choices about which programs are suitable for their families.
 - The comprehensive Canadian Television Rating System has been tested extensively across the country, and in the field in a five week V-chip trial. It is strongly supported by those who will benefit from it the most – Canadian families.
- 91% of Canadians support a comprehensive television rating system, which rates programming mainly according to the level of violence, but which also takes into account the presence of coarse language, sexual content or nudity.
 - 84% of Canadians approve of the comprehensive Canadian Television Rating System designed by the Action Group on Violence on Television.
 - 80% of V-chip trial participants found the comprehensive Canadian Television Rating System easy to use and understand.
- Once the violence classification system is approved, Canadian programming services can begin classifying and encoding their programming, after which cable companies can begin to make available V-chip technology to those consumers who request it.
 - AGVOT cautions the CRTC that the introduction of the rating system faces complicating factors over which the industry has little control.
- There are still significant technical and software problems for both cable companies and programming services. For example, the programming encoding software cannot properly react to scheduling changes. It is not 'robust' and has proven to be susceptible to failure.
 - Reliable transmission of encoding data for promotional materials and movie advertisements is not currently possible.
 - Older generation compression and scrambling technology affect the ability of some specialty, pay and distant signal services to be encoded.
 - There are still too many rating systems to be compatible with North American standards for V-chip devices that will be incorporated into television sets.

- Not all North American rating systems have been finalized, affecting the timetable for manufacture of the V-chip boxes.
- Consumers who have tested the V-chip in retrofitted converters and more recently in stand-alone boxes show little interest in using the V-chip in those configurations. 64% of V-chip trial participants said they would prefer the blocking device be built into their television sets.
- Canadians' attitudes have changed in the past two years. While 75% still are concerned about the level of violence on television, interest in technology to block programming has declined significantly from 66% per cent to 55% per cent.
 - o AGVOT submits the Canadian Television Rating System to the CRTC for its approval, and hopes to continue its co-operative approach with the Commission in working towards a successful introduction of this innovative means to protect Canadian children.

**MEETING THE REQUIREMENTS OF CRTC PUBLIC NOTICE
1996-36**

CRTC Expectations	Industry Response
<p>The Commission designates AGVOT to develop a rating system consisting of 4 to 6 levels</p> <p>The system should rate the violence in broadcast programs</p>	<p>The Action Group on Violence on Television submits a system consisting of 7 levels, including "exempt"</p> <p>AGVOT submits a classification system which will rate violent content in programs</p> <p>AGVOT intends to incorporate its ratings into a comprehensive Canadian Television Rating System. Violence will be the most important content consideration, but information about other elements (such as coarse language, nudity and sex) will be included</p>
<p>The classification system should be compatible with V-chip technology</p> <p>Development of the rating system should involve input from the public, programmers and</p>	<p>The rating system tested by AGVOT in the 1997 trial does work with V-chip technology</p> <p>Development of the rating system involves representatives from broadcasters (both private</p>

distributors

and public), specialty channels, the cable industry, and the independent production community

The rating system was evaluated by nearly four hundred Canadian families who worked with V-chip technology in their homes, and in a national public opinion survey

Community groups and professional associations concerned about violence on television were consulted

All AGVOT's research shows that the system is easily understood by families AGVOT established and maintained links with the U.S. Implementation Committee

Research conducted by AGVOT indicates strong public support for harmonization between the Canadian and American ratings systems

The CBSC indicates to AGVOT that it will perform these functions

French language, pay TV and pay-per-view services are represented on the AGVOT classification committee

**The rating system should be informative and readily understandable to the viewer
The Canadian industry should work with U.S. counterparts to promote a common North American classification system**

The Commission wants to be informed whether the Canadian Broadcast Standards Council (CBSC) will act as a clearing house for the exchange of ratings information, and as an arbiter in case of dispute

The Commission encourages the industry to work towards integrating the rating schemes

The Action Group on Violence on Television is a pan-industry organization, formed in February 1993 to coordinate broadcast and cable industry strategies and initiatives to deal with the issue of violence on television. In response to CRTC Public Notice 1996-36, the Action Group reactivated and expanded its Classification Committee in April 1996. A coordination secretariat was established and a budget struck. Financial support for the project was provided by all sectors of the industry.

The Classification Committee's mandate was to develop a simple, parent-friendly rating system for violence in programming, which would work with the V-chip technology. As per PN 96-36, the classification system would apply to children's programming, drama programs, "reality shows" (reality-based dramatic programs) and feature films, as well as promotional spots for any of these types of programs, and advertisements for theatrical releases.

Under the direction of the AGVOT executive (chaired by Trina McQueen, president of the Discovery Channel), the Committee was asked to determine how many levels should be developed, keeping in mind a four-to-six-level system as being most useful (based on the public hearing process and on previous consumer research undertaken by AGVOT). The Committee was also asked to explore means to make the Canadian system compatible with the one under development in the United States, given the extensive cross-border flow of programming. Research from previous V-chip trials had also indicated that consumers thought compatibility with the American system was very important.

In PN 1996-36, the Commission acknowledged the reality of multiple classification systems in Canada for the immediate future. It agreed that Quebec French-language broadcasters and their viewers, already familiar with the Régie du cinéma ratings system, would continue to employ that system for the classification of their television programming.

The CRTC also acknowledged in PN 1996-36, that premium movie and pay-per-view services, which already were classifying their programming based on provincial theatrical ratings systems, could continue to use these ratings for their unedited feature films at this point in time.

Therefore the ratings system being developed by the AGVOT Classification Committee would be used by English language conventional (over-the-air) stations and networks, and by English language specialty services.

Membership in the Committee was structured to involve all elements of the Canadian broadcasting industry to ensure a diverse range of views would be brought to the table as the system was built.

The following corporate groups, programming services and industry associations were active participants in the work of developing a classification system: Baton, CanWest Global, CITY/CHUM, WIC, the CTV network, CBC television network (English), Rogers (CFMT-Multilingual), Télé-Métropole (TVA); Bravo,

Showcase, YTV, WTN, Vision, SuperChannel/MovieMax, Super Écran, Rogers Cable, Shaw Cable, the Canadian Association of Broadcasters, the Canadian Cable Television Association, the Canadian Film and Television Production Association, the Association of Canadian Advertisers, and the Telecaster Committee.

Given the future role of the Canadian Broadcast Standards Council (CBSC) in adjudicating complaints about violence classification, a representative from the CBSC attended the Committee meetings with observer status.

Beginning in May 1996, the Committee met in full formal session a total of five times over an eight month period.

As protection of children has been the underpinning of how Canada has addressed the issue of violence on television, the first key question for the Committee was to deal with content in children's programming. As the Classification System will function as a component of the industry's *Voluntary Code on Violence in Television Programming*, it was important to build the ratings for children's programming on the foundation of the Children's Section of the CRTC approved Code, where there are strict rules clearly established for the portrayal of violence in children's programming.

While the Commission itself defined children as all youngsters under the age of twelve, the Committee felt that a single children's category would be too broad an age spectrum, and needed to be divided into two levels. Committee members, many of whom are parents themselves, turned to research undertaken by Dr. Wendy Josephson of the University of Manitoba. In her study prepared for the Department of Canadian Heritage, she noted that age eight has been identified as a watershed period for the effects of television violence on children, particularly in terms of being able to distinguish reality from fantasy.

With these two categories in place, establishing the levels of the rating system for non-children's programming emerged over subsequent committee sessions. In the end, the committee agreed that four classification levels could accommodate the range of programming from that designed for a broad general audience, to programming intended for adult audiences.

The guidelines for violence content were built word by word, to provide useful information for parents. The descriptive information was deliberately kept concise, to ensure ease of comprehension and use. The violence guidelines begin with "minimal and infrequent" in the first of these four classifications. The content gradations conclude at the fourth level with "violence intended for adult audiences," the description used in establishing the criteria for violence in programming which must be scheduled no earlier than the 9pm "watershed hour," in the industry's voluntary code.

The challenge in building the classification system was substantial. It would have to be capable of dealing with the wide range of programming offered by English-

language services through over-the-air local stations, national networks, and cable-delivered specialty services, ranging from children and youth-oriented services such as YTV to services such as Showcase, and Bravo!.

The committee finally concurred on the following classification system for rating the level of violence in the designated program categories: children's programming, drama programs, "reality shows" (reality-based dramatic programs), and feature films; as well as promotional spots for any of these types of programs, and advertisements for theatrical releases.

EXEMPT

CTR~E

DESCRIPTIVE

Exempt programming includes: news, sports, documentaries and other information programming; talk shows, music videos, and variety programming.

CHILDREN

CTR~C

DESCRIPTIVE

Programming intended for children with this designation must adhere to the provisions of the Children's section of the Canadian Association of Broadcasters (CAB) Voluntary Code on Violence in Television Programming.

As this programming is intended for younger children under the age of 8 years, it will pay careful attention to themes which could threaten their sense of security and well-being. As programming for children requires particular caution in the depiction of violence, there will be no realistic scenes of violence. Depictions of aggressive behaviour will be infrequent and limited to portrayals that are clearly imaginary and unrealistic in nature.

Violence Guidelines

- might contain occasional comedic, unrealistic depictions

CHILDREN over 8 years

CTR ~ C8+

DESCRIPTIVE

This classification is applied to children's programming that is generally considered acceptable for youngsters 8 years and over to view on their own. It is suggested that a parent/guardian co-view programming assigned this classification with younger children under the age of 8.

Programming with this designation adheres to the provisions of the Children's Section of the CAB Voluntary Code on Violence. These include not portraying violence as the preferred, acceptable, or only way to resolve conflict; or encouraging children to imitate dangerous acts which they may see on the screen.

Programming within this classification might deal with themes which could be unsuitable for younger children. References to any such controversial themes shall be discreet and sensitive to the 8-12 year age range of this viewing group.

Violence Guidelines

- **any realistic depictions will be infrequent, discreet, of low intensity, and shall portray the consequences of violence.**
- **violence portrayed must be within the context of the storyline or character development.**
- **might include mild physical violence, comedic violence, comic horror, special effects; fantasy, supernatural, or animated violence**

FAMILY

CTR ~ FAM

Considered acceptable for all age groups. Appropriate viewing for the entire family.

DESCRIPTIVE

This is programming intended for a broad, general audience. While not designed specifically for children, it is understood that younger viewers may be part of the audience. Therefore programming within this classification shall contain very little violence, either physical, verbal or emotional.

It will be sensitive to themes which could threaten a younger child's sense of security, and will depict no realistic scenes of violence which minimize or gloss over the effects of violent acts.

Violence Guidelines

- **minimal, infrequent**
- **may contain comedic, unrealistic depictions**
- **contains no frightening special effects not required by storyline**

DESCRIPTIVE

This programming, while intended for a general audience, may not be suitable for younger children (under the age of 8).

Parents/guardians should be aware that there might be content elements which some could consider inappropriate for unsupervised viewing by children in the 8-13 age range.

Programming within this classification might address controversial themes or issues. Cognizant that pre-teens and early teens could be part of this viewing group, particular care must be taken not to encourage imitational behaviour, and consequences of violent actions shall not be minimized.

Violence Guidelines

- any depiction of conflict and/or aggression will be limited and moderate; it might include physical, fantasy, or supernatural violence.

- any such depictions should not be pervasive, and must be justified within the context of theme, storyline or character development.

DESCRIPTIVE

Programming with this classification contains themes or content elements which might not be suitable for viewers under the age of 14. Parents are strongly cautioned to exercise discretion in permitting viewing by pre-teens and early teens without parent/guardian supervision, as programming with this classification could deal with mature themes and societal issues in a realistic fashion.

Violence Guidelines

- while violence could be one of the dominant elements of the storyline, it must be integral to the development of plot or character.

- might contain intense scenes of violence.

ADULTS

CTR~18+

Intended for adults 18 years and older.

DESCRIPTIVE

This classification applies to programming which could contain content elements that would make it unsuitable for viewers under the age of 18.

Violence Guidelines

- contains depictions of violence which, while integral to the development of plot, character or themes, are intended for adult viewing, and thus are not suitable for audiences under 18 years of age.

THE ACTION GROUP HEREBY SUBMITS THIS CLASSIFICATION SYSTEM TO THE COMMISSION FOR ITS APPROVAL, IN RESPONSE TO CRTC PN 1996-36, BELIEVING THAT IT MEETS THE CRTC'S REQUIREMENT OF "AN INFORMATIVE AND USER-FRIENDLY VIOLENCE RATING SYSTEM."

THE CANADIAN BROADCAST STANDARDS COUNCIL

In its report to the Commission of September 6, 1996, AGVOT indicated that the Canadian Broadcast Standards Council was prepared to act as an intermediary to resolve disputes between programming services and their viewers regarding classification levels applied to programs.

The process would be identical to the CBSC's current role in ensuring adherence to industry Codes. Any viewer who believed that a programming service did not classify a program correctly would have the right to have their complaint referred to the CBSC for adjudication, if the disagreement was unable to be resolved satisfactorily between the viewer and the programming service.

As the Commission is aware, 93% of Canada's conventional over-the-air private television stations are CBSC members. In addition, those specialty programming services which are owned by broadcasting companies, such as Much Music, Bravo and WTN are also automatically entitled to CBSC membership.

The Council is in the process of expanding its membership to include other specialty programming services. Vision TV has just confirmed its participation as

a member, and most, if not all, other specialty services are expected to be part of the CBSC by the time the classification encoding process is rolled out.

Discussions have also been held with the CBSC, in regards to the Council serving as a clearing house for sharing program classification information, as mentioned in CRTC Public Notice 1996-36. As the Commission may be aware, the CBSC maintains an information-filled Website on the Internet and sees that facility as the best way to facilitate exchanges of programming ratings information.

Once the classification regime is in place and operating, all CBSC members would be able to file ratings information for programs in their schedules in a section of the Council's Website. All CBSC members would subsequently be able to access data filed by other stations and services, to see how programs and feature films were rated, and on what basis. This function would obviously get to be more important as time went on and shows were being re-licensed or syndicated to other broadcasters.

The CBSC is currently working with its Website provider to develop this membership feature of the Council's Website.

A COMPREHENSIVE CLASSIFICATION SYSTEM

The CRTC mandated AGVOT to develop a classification system that would rate only violent program content.

However, as they built the system which we have submitted for Commission approval, it became clear to the committee of experts who purchase, schedule and promote programming on Canada's television services, that a rating system which focused only on violence would not adequately serve the needs of viewers, particularly parents.

These programmers, who regularly deal with both compliments and complaints from the viewing public, said audiences would find a system that rated only violent content deficient in providing useful information upon which to base their viewing choices. There would be occasions when a program would contain no violence, yet not be suitable for younger audiences due to language, nudity, sexuality, and/or mature themes, and a violence-only rating system would not be functional in informing parents about this other content.

Furthermore, in research conducted for AGVOT in 1994, seventy per cent of respondents strongly agreed that coarse language, nudity, depictions of sexuality and mature themes should be included in a television classification system which had violence as the most important content element to be rated.

The Committee then developed a ratings structure which would blend all of these content elements into a comprehensive classification system, in order to provide even more information to parents than had been requested by the CRTC.

At each stage of development of the comprehensive system, the programmers "road tested" it against their current schedules, to determine whether it would be effective in categorizing program content in a manner that would be informative for viewers, particularly parents.

CLASSIFICATION SYSTEM - CONSUMER RESEARCH

AGVOT sought the opinion of the Canadian public about its proposed classification system by means of three separate research projects.

- (1) The Environics Research Group was commissioned to undertake a national in-house survey of 1,500 English-speaking Canadians in all parts of the country.
- (2) A second, independent team from Environics was retained by the Canadian Cable Television Association and AGVOT to conduct a telephone survey of households that participated in the V-chip field trial.
- (3) The Strategic Counsel Inc. was retained by the CCTA on behalf of AGVOT to conduct focus group sessions in each of the five test market cities, with parents whose families had participated in the V-chip trial.

The key points from each research project are outlined here, with each of the full reports appended to this filing.

The National Survey

A total of 1,548 English-speaking adult Canadians were interviewed by Environics Research between March 11 and 31, 1997. This sample size provides a margin of error of plus or minus 2.5 percentage points, 19 times out of 20.

It is important to note that these interviews were conducted in-home, giving participants the opportunity to thoroughly read through a description of the Canadian system.

A large majority of Canadians approve of the three major elements of the proposed Canadian Television Rating System.

- 91% approve of a system which rates programming mainly according to the level of violence it contains, but also taking into account the presence of coarse language, sexual content or nudity.
- 86% approve of rating children's programs as either C, meaning they are suitable for all children, or C8+, meaning they are suitable only for children age eight and older.
- 88% approve of rating programs not made for children with one of four levels: programs that are suitable for all ages, programs that contain content that may not be suitable for younger viewers, programs suitable for viewers 14 years and over, and programs suitable for viewers 18 years and over.

After reading a one page description of the classification system which outlined the content elements in each level, a large majority of respondents indicated they approve of the system.

- 84% approve of the Canadian Television Rating System
- 85% of parents with children under eighteen approve of the system, and 84% of parents with children under 12 approve of the rating system

The system also gets very high marks for usefulness and ease of understanding

- 86% of parents with children under eighteen believe it will be helpful for making choices about what their children will be able to watch; the number is 87% for parents with children under twelve years of age
- 85% of respondents think the system is easy to understand

There was also a strong desire for compatibility between the Canadian and American ratings systems.

- 71% felt it important that the Canadian and U.S. systems be the same or similar

The V-chip Trial Survey

A total of 340 of the participants in the trial of the technology and the classification system were interviewed by telephone, in the test market cities of Vancouver, Edmonton, Toronto, Ottawa, and Trois-Rivières.

These families gave high approval to the Canadian Television Rating System, with clarity and ease of distinguishing between the rating levels being the most commonly mentioned positive features. 80% indicated it was easy to understand the different rating levels.

Most participants based their choice of rating level on family standards (33%), or on their children's ages (31%). The majority were able to find an appropriate level in one or two attempts. Families chose the following viewing levels:

FAM (Family)	27%
C (Children)	25%
14+	19%
PA (Parental Advisory)	11%
C-8+ (Children 8 plus)	10%
18+	4%
Exempt	1%

There were three classification systems operational during the trial: The Canadian Television Rating System; the Quebec system, a modified version of the system used by the Regie du cinema; and the one recently developed by American broadcasters. (For technical reasons, no Canadian pay services were able to participate in the trial). Families were thus able to comment from experience on the need for harmonization between the various systems.

More than three quarters (78%) felt it was very important, or somewhat important that the Canadian and U.S. rating systems be the same or similar. More than half (53%) of the users of the Quebec system thought that the Quebec system should be identical to the Canadian system, and another 23% said it should be similar, but not necessarily identical.

V-chip Focus Groups

A series of focus groups was conducted in each of the five trial cities, with between eight and ten participants per session, each of whom had participated in the trial . Each of the participants had at least one child living in the household.

In these sessions, the feeling was even stronger that there needed to be a consistent rating system for Canada and the United States. There was virtual unanimity with participants stating that two or three different ratings systems only complicated the use of the V-chip as it required making multiple decisions about the appropriate rating level for their family, with the subsequent necessity to program the separate ratings systems within the V-chip box.

They also considered it nonsensical that there could be different ratings applied to the same program by Canadian and American services, given the large number of identical programs. This finding is similar to that of earlier trials, when consumers could not understand the logic of having different ratings systems.

In terms of reacting to the Canadian Television Rating System, while some focus group participants found the ratings too broad, there was general consensus that the age and content combination was useful. They also appreciated the effort to keep the descriptors simple to understand. They also indicated that as the system is introduced across the industry, programming services will have to gain the confidence of the population that shows will be rated appropriately.

CONSULTATIONS

As part of the early consultation process, AGVOT solicited advice from provincial film censor board officials and others, who had participated in the CRTC's hearing process.

- From Sharon McCann, Alberta Office of Film Classification, and Mary-Louise McCausland of British Columbia's Film Classification Office, we heard that any system developed must be simple to understand. They urged AGVOT to build on the base of familiarity created by the public's use of the movie ratings.
- Jill Hightower, of the BC Institute on Family Violence stressed that the system should be easy for parents to use, and pointed out that too complex a system would create difficulties for parents, and particularly for newly-arrived Canadians, as they began to understand and adapt to the culture of their adopted homeland.
- There were early discussions with Alan Mirabelli, Executive Director of the Vanier Institute of the Family, a national voluntary organization dedicated to promoting the well-being of Canada's families. The advice there was to keep it simple, as harried parents need tools which are easy to use. He suggested this is an situation where too much information would be intimidating, with the unfortunate result that parents could say it is just too complicated and not use it.
- A meeting was held very early in the process with a coalition of community-based interest groups under the umbrella organization of the Cultural Environment Movement (CEM). Included were representatives from organizations such as Canadians Concerned About Violence in Entertainment (C-Cave), the Coalition for Responsible Television, and the Coalition for the Safety of our Daughters. During this meeting the CRTC

decision (PN 96-36) was reviewed, and input regarding the classification was solicited.

- Spokespersons for these groups indicated their concern that certain programs were not going to be rated, such as talk shows, sports and music videos, and expressed apprehension that the V-chip would provide parents with a false sense of security.

Once the Classification Committee had come to a general consensus on the number of levels, and had drafted the language of the descriptive and guideline information, input was sought from experts not directly involved in the industry.

- Father John Pungente, head of the Jesuit Communication Project, and the Canadian Association of Media Education Organizations (CAMEO), is one of Canada's foremost experts on media literacy. He reviewed the draft system, and suggested some changes to the language, to enhance clarity. (These changes were subsequently incorporated by the Committee) He was very supportive of including all content elements, not only violence in the system, and commented "you have something here that will work fine."

Fr. Pungente suggested that as the industry distributes information on the ratings system to consumers, other related materials be included, such as the CAB's Voluntary Code on Violence in Television Programming, and Media Literacy brochure, and the CCTA's brochure on children and television based on the study by Dr. Wendy Josephson. He believed it important to put the classification system into context for parents, and believed that materials such as these would be helpful in making the ratings system useful.

- AGVOT met with Kealy Wilkinson, National Director of the Alliance for Children & Television, an organization which fosters the development of quality children's programming. Ms. Wilkinson was pleased to see there were two categories for children, and agreed with the age break at eight years. She strongly endorsed inclusion in the rating system the reference to 'themes that could threaten a child's sense of security', noting that it is not only depictions of violence that can affect a child's sense of well-being. The point of discouraging imitational behaviour in the children's guidelines was also lauded.

On the advice of Ms. Wilkinson, AGVOT included a section from an Alliance For Children publication "Prime Time Parent" in the manual provided to programming services for the trial. The two-page child development chart, which explains how children of certain ages watch television, and what their fears are, was provided to programmers as additional reference information to assist them in selecting ratings for their children's programming.

- Opinions were also sought from leading staff members at the Media Awareness Network. This group has created a cutting-edge Internet site unlike anything else available internationally, which offers an diverse

range of media education and media literacy materials in both official languages for use by parents, teachers and community groups. The Media Awareness Network staff commented on the clarity of the language, which will make it easy for parents to understand it when presented on their site, in the section for families dealing with media education in the home.

The Network will make the full AGVOT report available on its site. Once the classification system receives CRTC approval, the Network will create a separate section on television classification systems designed for easy access by educators, parents and community groups.

- AGVOT asked Leslie Adams, the Chair of the Ontario Film Review Board to comment on the system. She was supportive of the 14+ age break for teenagers and was interested in the suggested descriptors for children's programming. Ms. Adams applauded the concept of a comprehensive ratings system, which includes other content elements in addition to violence. She indicated this was a more meaningful way to rate programs, and would better address the concerns of parents with young children. Ms. Adams also encouraged AGVOT to "Keep It Simple."
- The Board of the Canadian Teachers Federation, an organization which has been very active in the debate regarding the effects of violence in the media, was briefed on the AGVOT ratings system. They were not supportive of the classification system's approach to distinguishing between depictions of real violence and fantasy violence in children's programming. The CTF commented that in its view, exposure to violence on television is harmful, whether or not the child is confused about its "reality."
- Comments on the proposed rating system were sought from the Canadian Paediatric Association. Dr. Emmett Francoeur of Montreal, Director of the Association's Psycho-Socio Paediatric Committee, said he found the definitions to be quite clear, and favouring the 'overprotection' of children. Dr. Francoeur cautioned that some developmental psychologists could argue with the break at age eight in the children's section. However, he described the overall system as a good tool for parents and caregivers, to begin a more active role in monitoring their children's interaction with the media.
- A second meeting was held with the coalition of groups referred to earlier, in order to brief them on the industry's progress in developing a classification system. In addition to representatives of C-Cave, there were also attendees from the Hope for Children Foundation, the Durham Region Family Action Council, and Canadians Against Sexual Exploitation (CASE). A full explanation of the system, and the rationale behind its form and content was provided.

While some participants commented that particular aspects of the proposed classification system did not go far enough for them in certain areas, at the conclusion of the session, Ms. Rose Dyson, well-known to the CRTC as a media consultant and long-term C-Cave Board member, described the system as "a significant step forward."

- Allan Mirabelli, of The Vanier Institute of the Family, who had offered guidance in the early stages of the system's development, was briefed on the proposed system after it had been signed off by the Classification Committee. His comment was that "the system is very workable; it is clean, and it takes the emotion out of it." He expressed the view that the rating system will be an enabler for parents, and suggested that use of the system could focus parents' attention not only on what their children were watching, but how much television they were watching, a key theme put forward by the Institute at CRTC hearings and other conferences.

THE 1997 FIELD TRIAL

One of the key reasons AGVOT requested an extension from the CRTC was to allow the necessary time for another V-chip trial. Such a test was viewed as critical to assess consumer response to the proposed classification system, and improved V-chip technology.

Trial Logistics

This trial was the fourth test since early 1995 and the first to test an industry-developed classification system. It was far and away the most ambitious in terms of the number of families and programming services that would participate, as well as the complexity of the technical and software specifications.

There were also significant costs involved. Most of the broadcasters, even those who had taken part in earlier V-chip trials had to acquire new field 2-compatible hardware and software. Their programming and operations personnel had to spend numerous hours first learning, then implementing the procedures for reviewing, rating and encoding the hundreds of hours of programming.

Rogers, Shaw and Cogeco volunteered to test the V-chip with their subscribers in Vancouver, Edmonton, Toronto, Ottawa and Trois-Rivières. The Canadian Cable Television Association (CCTA), on behalf of its members, assumed the costs of the five hundred V-chip boxes and financed and managed the trial research. This included retaining the research company to recruit the families and conduct the post-trial research; writing the technical specifications for the standalone V-chip box; overseeing the design, production and delivery of five hundred V-chip boxes; and writing the bilingual User Manual for the trial families.

V-chip Decoder Description

The decoder developed for this trial was a standalone V-chip box manufactured by Tri-Vision Electronics Inc. The decoder was implemented with bilingual user menus and supported four single-category classification systems consisting of six different levels. The menu screens were designed in such a way as to promote simplicity of use. For this test, the user menus were permanently programmed into the five hundred V-chip boxes. However, later versions of decoders will be equipped with chips that can be reprogrammed at the factory if software modifications are required in the future.

The V-chip decoder was controlled by a small but effective remote control unit which consisted of 12 buttons: 10 numbers, plus a "VIEW" and a "MENU" key. The decoder interfaced at RF using CH 3 for the input and output of the box. The decoder did not have tuning capability and therefore required a VCR or external converter box to be placed at the input of the V-chip decoder to act as the tuning device. Stereo sound was fully supported and a 4-digit Personal Identification Number (PIN) assured a fair degree of security.

V-chip Trial 1997

It was originally expected that the trial would commence at the beginning of January, 1997 and continue for sixty days. However, there were delays in manufacturing and shipping the five hundred V-chip boxes (the largest number ever produced), therefore the test did not officially begin until February 7, 1997. In the meantime, families were being recruited for the trial, and boxes were being installed in homes as they became available. Programming services were testing their new equipment, ensuring that the encoder in particular interfaced smoothly with their existing operational configuration - a critical issue since it would be feeding into their programming stream.

The 1997 V-chip trial saw nearly three times as many broadcasters taking part as in the previous trial, nearly a year earlier. A total of twenty-eight programming services participated:

- 14 conventional stations in five markets
- 3 national networks
- 7 specialty services
- 4 US border stations

Unfortunately, technical restrictions prohibited several programming services which had been key participants in earlier trials from taking part. They currently use the DigiCipher 1 scrambling system which is unable to support field 2 data. This meant that neither YTV nor any pay-TV services were able to physically encode their programs for the trial. Nevertheless they were significant contributors to the Programming and Technical/Software Committees.

Trial Recruitment

Environics Research Group was commissioned to recruit the five hundred families for the trial, as well as conduct a detailed, evaluative telephone interview at its conclusion. In order to recruit participants, telephone calls were made to a random selection of Canadian households including some households that in earlier representative surveys had indicated their families included small children. To qualify, respondents had to be parents or guardians with children aged 3 to 12. They had to agree to have the V-chip installed in their homes for a 3-4 week period, commit to use the system and participate in a subsequent research interview.

It was much more difficult to recruit families for the trial than either AGVOT or Environics had foreseen. In Trois-Rivières alone, almost 5,000 households were contacted before identifying eighty nine who were eligible and who agreed to participate.

A possible explanation for the difficult recruiting process can be found in questions posed as part of a consumer attitude survey undertaken by Strategic Counsel on behalf of the CCTA this spring. Consumers were asked about their concern regarding the level of violence on television. The results were compared to those from similar surveys in 1995 and 1996. While Canadians' concern remains consistent - 73% over two years, their interest in technology to block programming has dropped significantly from 66% to 55% over the same period.

Consequently, there were finally only 374 households participating, rather than the recruitment goal of five hundred. Some households dropped out after agreeing to take part in the trial because of incompatible cable/broadcast services in their area (particularly in Edmonton); being unavailable during the installation period; or simply a change of mind.

For their part, the cable companies made sure that their installers were well-briefed in how to hook-up the V-chip box. Each installation took approximately half an hour, and the families were left with a detailed User Manual.

Research from earlier trials had indicated that a detailed yet easy to understand User Manual could be a critical tool in helping to determine the success of a V-chip trial. If participants became frustrated with the unfamiliar technology or needed a clear explanation of the various ratings choices, they needed to be able to access this information; otherwise there was a risk they would drop out of the trial in frustration. Accordingly, the User Manual was first vetted by a non-profit group specializing in simplifying prose and subsequently it was tested on several families in a focus group.

The results were worth this extra effort. According to the post-trial research, most participants had no problem understanding the Canadian Television Rating System. In all five focus groups, the participants reported that the ratings as described in the User Manual were easy to understand and readily programmed.

Once the trial was underway, each family was contacted by their cable company, to make sure that the equipment was working effectively and that there were no problems, again a lesson learned from earlier trials.

TRIAL RESEARCH

The trial ended March 16, 1997. Research began immediately with the Environics Research Group conducting an extensive telephone survey of all trial families, and The Strategic Counsel Inc. conducting focus groups in each of the five trial location cities.

(I) V-CHIP HOUSEHOLDS SURVEY

More than eight in ten participants (84%) found the V-chip box easy to use. The majority (80%) also found that it worked properly and they did not experience any difficulties with it.

Also, the improvements which were made to the V-chip since the last trial received good reviews including:

- a larger, multi-digit remote control (65% said they wouldn't change anything about it)
- a new on-screen menu (92% found it easy to understand)
- a PIN number for security (89% felt this was an effective way to control access)
- a Temporary Disable feature (75% found it useful)

Almost one half (49%) said they would be very (21%) or somewhat (28%) interested in having the V-chip system in their home on an on-going basis. The standalone box concept however did not test well. Only 11% chose a standalone box like the one they tested. When given various options two-thirds (64%) said they would prefer the V-chip to be built into their television. 18% said they would like the V-chip to be built into an existing TV converter - which is how the V-chip was offered to participants in earlier trials.

(II) V-CHIP HOUSEHOLDS - FOCUS GROUPS

A series of five focus groups was conducted in the V-chip trial centres. Focus group members were randomly selected from lists of V-chip trial participants provided from Environics Research. At least eight individuals participated in each focus group; all participants had at least one child living in the household with the majority having at least two or three children living in the trial household.

It was very clear from these focus groups that the high awareness of the V-chip prior to participation in the trial affected the participants' expectations for the technology and their subsequent disappointment in it. While most spoke highly of the V-chip technology as an important and very useful means of monitoring their children's television viewing, there was a general unwillingness to acquire the technology at the current time. Interestingly, there was a general feeling that changes and improvements to the technology would be made prior to availability within the marketplace - they were unwilling to believe that what they had tested was in its final form.

As with the telephone survey findings, the majority of participants found the technology easy to program and to use on an on-going basis. However, when able to voice specific problems in the environment of a focus group (compared to a more specific telephone questionnaire), some strong views emerged including:

- significant dislike of an additional set-top box
- significant dislike of an additional remote control
- complaints from those who required an additional converter
- significant frustration with problems using their VCRs

After using the V-chip technology for the period of the trial, very few participants reported they would either purchase or rent the box in its current form. While there was widespread praise for the concept of the V-chip most wanted to see changes in the technology prior to serious consideration of acquisition. Trial participants believe that like other technologies, the V-chip will become more sophisticated and the current technology which they tested is only in its initial stage.

TECHNICAL ISSUES

The AGVOT report filed last September with the Commission identified various technical issues which needed to be resolved during the 1997 V-chip trial, in order to guarantee a successful North American roll-out in the future. The issues identified included:

- the requirement of the V-chip box to handle three to four different ratings systems in both official languages;
- the importance of adhering to international standards and placing the V-chip data in line 21 of field 2;

- the need to field test the V-chip technical modifications by way of another V-chip trial;
- the benefits of a standalone box versus retrofitting converters;
- the belief that any system that Canada develops should be compatible, if not interoperable with that of the Electronic Industries' Association (EIA) published standard;
- the problems with the DigiCipher I and Scientific Atlanta scrambling systems' inability to support field 2 data; and
- the cost and delivery windows of the Extended Data Service (XDS) encoders, equipped to hold Closed Captioning in field 1 and V-chip data in field 2 of the video signal.

1. THE REQUIREMENT OF THE V-CHIP BOX TO HANDLE THREE TO FOUR DIFFERENT RATINGS SYSTEMS IN BOTH OFFICIAL LANGUAGES

The V-chip box was equipped with enough memory to handle the following four rating systems:

- i. Canadian Television Rating System (as developed by AGVOT)
- ii. Québec Classification System (modified Régie du cinéma)
- iii. Pay and Pay-per-view Classification System
- iv. U.S. Parental Guidelines

While it was found that the complexity of implementing more than one system was not a major factor in manufacturing the V-chip box, the costs associated with the additional memory to store the classification systems information in both official languages could be. In the recent V-chip trial, the classification systems tested were based on a single category system consisting of approximately six levels. If multiple systems were to be adopted, the costs associated with having to store all the relevant information for the various systems in two or more languages would lead to significant cost increases.

This issue is magnified when the V-chip gets implemented in television receivers as the television manufacturing industry designs their systems to the tenth of a cent to manage the costs of their products. Because Canada currently requires at least three classification systems to be adopted for its market alone, the U.S. manufacturers may be less than amenable to implementing the Canadian systems, in order to keep manufacturing costs down.

Survey results also indicate a strong interest from participants to adopt a common classification system to reduce potential confusion between systems and simplify the setting of a classification level for each household. This in return would lead to simpler on-screen menus, a lower cost product and an opportunity to take advantage of the V-chip technology being implemented in all television receivers in the future.

2 THE IMPORTANCE OF ADHERING TO INTERNATIONAL STANDARDS AND PLACING THE V-CHIP DATA IN LINE 21 OF FIELD 2

This last V-chip trial used technology which was compatible with the EIA technical standard which imbeds V-chip information into line 21 of field 2 of the video signal. This was the first time that line 21, field 2 V-chip services were field tested in North America.

One of the main objectives for carrying V-chip information in field 2 of the video signal was to eliminate the interference that the V-chip information was causing with the Closed Captions. The move to field 2 appears to have been successful, as throughout the trial no perceived interference was experienced between the Closed Captioning and the V-chip rating information.

Another benefit to carrying V-chip information in Field 2 is the increased frequency at which the information can be transmitted to the V-chip decoder, thereby potentially cutting in half the blocking or unblocking reaction time of the decoder. On average the V-chip rating signals were transmitted every three seconds.

Even with this improvement, trial participants claimed that the overall reaction time of the V-chip decoder appeared to be slow. Programs would continue to be blocked if one began channel surfing when the channel that was originally being watched was blocked. The same circumstances occurred in reverse when channel surfing through programs which had higher ratings than the program that was originally tuned to. A recommendation to the EIA may be required to increase the priority and frequency of the V-chip rating information to eliminate that problem.

3. THE FIELD TEST OF THE V-CHIP TECHNICAL MODIFICATIONS

The V-chip decoder developed by Tri-Vision was packaged as a standalone box for the purposes of the trial. Tri-Vision received the world rights from Tim Collings to manufacture the standalone V-chip box. The decoder design included enhanced features requested by earlier trial participants but which had not been previously implemented. These features included a 4-digit PIN number for security, a simple and user-friendly on-screen menu system, a fully bilingual display, stereo sound and a larger and more effective remote control unit.

The V-chip design tested during the trial was a compact, sleek and modern-looking box which interfaced using RF CH3 at the input and output. While almost all trial participants (84%) described the process of operating the decoder as "easy to use", the fact that the decoder was a standalone box and not integrated in a television set made all participants rate the technology fairly low due to the following reasons:

- a) it required an additional and separate box to be placed on top of the TV;
- b) it required a VCR or external converter to be connected at its input to act as the tuner;

- c) it removed the ability of subscribers to watch and record shows simultaneously;
- d) it meant that in some cases up to four remote control units had to be used, one for tuning, one for V-chip operation, one for the VCR and the fourth to control the volume on the television set;
- e) the V-chip could easily be defeated by physically disconnecting it from the television.

The V-chip trial box was designed with CH 3 input and output interfaces only which led to difficulties in implementing the box in Edmonton during the trial as that channel is used by a local broadcaster in that market. If V-chip standalone boxes are to be deployed in the future, the units will have to accommodate a selectable CH 3 or CH 4 interface to overcome the potential interference between the local broadcasters and the interfacing channel.

4. THE BENEFITS OF A STANDALONE BOX VERSUS RETROFITTING CONVERTERS

How should the V-chip be made available?

When trial participants were presented with various options pertaining to the packaging of V-chip, 64% responded that they would like to have the V-chip integrated in television sets, 18% in a converter and 11% in a standalone box.

With the V-chip integrated in a television set, the need for an external tuning device is eliminated and so is the need for an additional remote control unit. Moreover, it would not hinder the subscriber from being able to watch and record separate television programs, something that the standalone box does restrict.

The trial results also showed that approximately 50% of subscribers required an external converter. These were provided by the cable television operators free of charge for the duration of the trial. If this is an indication of the number of converters that would be required, a standalone decoder box without tuning capability may not be the best solution for the industry.

5. THE BELIEF THAT ANY SYSTEM THAT CANADA DEVELOPS SHOULD BE COMPATIBLE, IF NOT INTEROPERABLE WITH THAT OF THE ELECTRONIC INDUSTRIES' ASSOCIATION (EIA) PUBLISHED STANDARD

The EIA standard for XDS, still in its interim approval stage, is known as the North American standard for V-chip services. The missing element of the specification is the classification system which is still being debated in the U.S. As it stands, the EIA specification can accommodate one classification system and a possible second with some minor modifications. It does not have the ability in its current form to readily accommodate three or four or more classification systems.

This can have a major impact in Canada if we proceed with multiple systems or make no effort to sway the EIA to consider modifying the specification to accommodate the Canadian classification system(s).

The first approach which would guarantee that Canadian consumers could use the built-in V-chip functions of the television set would entail that we adopt the exact system that is being developed/debated in the U.S.

The second approach would entail Canadian manufacturing companies and Canadian consumer electronics manufacturers to join the EIA and participate on the RJ 4.1 committee which is tasked to develop and finalize the XDS specifications to ensure that it supports the Canadian systems as well.

Either approach guarantees that Canadians will have access to V-chip technology that is compatible and interoperable with that being developed and manufactured for the mass market in the U.S.

6. THE PROBLEMS WITH THE DIGICIPHER I AND SCIENTIFIC ATLANTA SCRAMBLING SYSTEMS' INABILITY TO SUPPORT FIELD 2 DATA

Certain broadcasters and specialty services were not able to participate in the most recent trial due to the fact that their transmission standard does not support carriage of data in field 2 of the video signal. The systems which do not support field 2 transmission are the DigiCipher I and Scientific Atlanta Phase 2 product which is sometimes referred to as "Orbit", and Scientific Atlanta's phase 3 product which is also known as the PowerVu system. These systems, with the exception of the PowerVu system cannot be upgraded to support field 2 transmissions. Any broadcaster or specialty service using those systems must replace the entire system at a cost of approximately \$100,000 per channel.

The PowerVu system is claimed to have the ability to support field 2 transmissions, however, Scientific Atlanta has not yet provided the upgrades to Telesat or to the specialty services using that technology.

7. THE COST AND DELIVERY WINDOWS OF THE EXTENDED DATA SERVICE (XDS) ENCODERS, EQUIPPED TO HOLD CLOSED CAPTIONING IN FIELD 1 AND V-CHIP DATA IN FIELD 2 OF THE VIDEO SIGNAL

The suppliers of the XDS encoders equipped with the Closed Captioning and field 2 services capability were able to deliver product within a two to three-week window. However, it was found that some of the Extended Data Services (XDS) encoders supplied by some manufacturers performed better than others.

Typical problems related to the equipment's inability to encode both the Closed Captioning signal and the V-chip ratings simultaneously. Clearly, the ability to encode both forms of information simultaneously is a key requirement and needs to be addressed by the encoder manufacturers before their products can be

implemented.

BROADCASTER TECHNICAL ISSUES

From the trial, a number of critical concerns emerged for programming services, at both the programming and engineering/operations levels.

(a) Encoding Promos and Movie Trailers

All twenty eight participating programming services indicate encoding promos and movie trailers cannot be done with the current stand-alone software. There are several issues.

(i) As the current software runs strictly to clock time, it cannot react to circumstances where commercials are not scheduled at an exact time. This is standard in news, sports, and other live-event programming, where the commercial insert breaks are often determined in real time, and thus are unable to be programmed into the encoding software. This means there currently is no way to guarantee the correct encoding for movie commercials and promotional spots is transmitted at the exact time these spots are on the air.

(ii) Only one service, with no live programming, made an attempt to encode for trailers and promos. It took a full 8 hours each day to manually load in the day's log, an unrealistic proposition for most programming services running on minimal staff. For those services which only encoded their programs for the trial, it took about half an hour to load in a day's playlist, once the show data base was built.

A realistic assessment of the problem is that encoding of promos and movie commercials is not feasible until the encoding system is dynamically linked into a station's traffic and automation systems. While traffic system manufacturers are beginning to examine how to do this, no real progress will begin until the US ratings system is finalized.

(iii) The other option for this problem is to stripe the trailers and promos with the encoding information as they are transferred to the in-house tape format or to a file server. However this option has considerable manpower and equipment implications for services which may have to equip as many as three production edit suites with the encoder/computer package, at approximately \$12,000 a system. Furthermore, not all file servers support field 2 data, which could be problematic.

(iv) Another consideration is the timeliness of the material's availability. Some movie commercials arrive within hours of airtime. The same situation occurs with many promotional spots, which are cut from episodic material fed to stations in the morning for prime time airplay. Dubbing these spots is one thing. Ensuring

that the large number of staff who process the material are fully trained to apply the appropriate encoding information is something else.

Both the AGVOT classification and technical committees are adamant that this part of the encoding regime cannot be implemented with any degree of technical and operational reliability, until the software for traffic and automation systems is re-written to accommodate encoding data. That evolution could take up to two years. Only at that time will the encoding process be transparent to a station's operating system, with the rating information loaded in via the commercial log.

(b) Software

Both programmers and engineers have deep reservations about the current software. They indicate it requires extensive modifications to the point that a new start may have to be made.

(i) Considerable re-design of the screen displays used by programmers to load ratings information is required. The software needs to be modified to allow each service to create their own broadcast day, rather than a clock day.

(ii) At the moment there is no simple way to over-ride the system in situations where live event programming runs past the scheduled time. When that occurs, the Master Control operator has no time to re-program the encoding software to reflect the new schedule. Under the existing software/hardware configuration, this live programming could be blocked, as the encoder assigns a rating to the program it believes is running at that time.

The ability to impose an easy and technically foolproof override mechanism is vital and needs to be developed before widespread introduction of the encoding regime.

(iii) Members of the AGVOT Technical committee described the need for the software to be more "robust." Some programming services reported circumstances during the trial where the software either became hung-up, failed to apply the correct code, or inserted an incorrect code. They would like direct input into any revisions made to the software.

(iv) There is intense concern that there is currently only one software supplier, itself a modest operation. If the software company is incapacitated in any fashion, programming services will be vulnerable. The view was that the industry would be unwise to implement such an important process based upon one supplier.

Questions remain regarding the expense of modifying the software to meet the needs of programming services, and whether these modifications can be completed and tested by September, 1997.

(c) Hardware

Only one brand of encoder really functioned without difficulty during the trial , the EEG-470. A second make was tested, but was found to be unreliable, and unable to handle both encoding and closed captioning requirements within a single unit. EEG appears to be acceptable on matters of delivery and reliability, and more manufacturers will undoubtedly come on stream over time. But at the moment, there is only one encoder supplier, which is again risky for broadcasters.

(d) Compression/Scrambling Technology Problems

A number of programming services are still facing difficulties with older generation technology which is unable to process field two information. For example, CanCom which uses Scientific Atlanta Phase 2 is unable to pass field 2 of Line 21 for City, CHCH, BCTV and other conventional services. This means these stations would be encoded in their home markets, but not in the markets where they are a distant signal delivery.

CTV/Baton and several Montreal-based services are still working with Scientific Atlanta Phase 2 and 3 equipment, which is unable to transmit field 2 data, where the encoding information is embedded. A number of specialty services such as WTN and YTV are using DigiCipher 1 equipment which is also unable to transmit field two data. It is uncertain whether any of these services can be upgraded in time for September 1997.

QUEBEC RATING SYSTEM

In PN 1996-36, the Commission noted the recommendation from AGVOT and others that given the familiarity with, and acceptance, of the Régie du cinéma rating system in Quebec, French-language broadcasters in that province should use that system.

During the process of developing the AGVOT classification system, regular dialogue was maintained with Quebec broadcasters, who had formed their own working group on ratings: Le Sous-Comité, Sur La Puce Anti-Violence.

This committee, with representatives from Télé-Québec, Canal Famille, Radio Canada, and TVA (Télé-Métropole), developed a variation on the Régie system, which they proposed be tested during the V-chip trial.

This Québec system, which was used during the trial only to classify violent content in the required program categories, is as follows:

E	Émissions exemptées de classement
Général	Pour Tous
8 ans+	Peut ne pas convenir aux enfants de moins de 8

	ans: l'accompagnement adulte est donc recommandé
13 ans+	Peut ne pas convenir aux enfants de moins de 13 ans: l'accompagnement adulte est donc fortement recommandé
16 ans+	Peut ne pas convenir aux moins de 16 ans
18 ans	Réservé aux adultes

Quebec broadcasters reported after the trial that the system worked well, that the addition of the 8 ans + level to the Régie system was a useful addition in classifying children's programming.

In Quebec, as in other regions, parents who participated in the trial spoke strongly in favour of a similar rating system for Quebec, English language, and American programming services, in order to reduce viewer confusion and make the V-chip as easy to use as possible.

THE AMERICAN SITUATION

On December 19, 1996, the US Implementation Committee released its *TV Parental Guidelines System*.

Under American legislation, V-chips will not be in use in the U.S. until 1998, when they will be built into television sets. In order to bridge this period, American broadcast and cable services opted to implement their ratings system by displaying the program's classification on screen at the beginning of the program.

The ratings system currently in use by American programming services is as follows:

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 from 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 physical 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.

The following categories apply to program 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 may contain some material that some parents would find unsuitable for younger children. Many parents may want to watch it with their younger children. The theme itself may call for parental guidance. The program may contain infrequent coarse language, limited violence, some suggestive sexual dialogue and situations.

TV14 (Parents Strongly Cautioned)

This program may contain 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 may contain sophisticated themes, sexual content, strong language and more intense violence.

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 may contain mature themes, profane language, graphic violence, and explicit sexual content.

On January 17, the television industry submitted its voluntary system of parental guidelines for rating television programming to the American Federal Communications Commission for review. This action follows the 1996 Congressional enactment of the US Telecommunications Act of 1996. The Act encourages the video programming industry to "establish voluntary rules for rating video programming that contains sexual, violent or other indecent material about which parents should be informed before it is displayed to children," and to voluntarily broadcast signals containing these ratings.

The Act further requires the FCC to "consult with appropriate public interest groups and interested individuals from the private sector" about the industry's voluntary plan, and then to determine if "such rules are acceptable to the Commission." That consultation process is now underway. April 8th was the first deadline for written submissions, the reply deadline is May 8, the surreply deadline is late June. A public hearing is planned for June 4.

There is no timetable in the Act for when the FCC must make its determination as to whether the industry-recommended plan is acceptable or not. If the Commission, however, subsequently determines that the industry's ratings plan is not acceptable, the Act requires the Commission to then establish an advisory committee to study the issue and make recommendations on a rating system, and to then prescribe "guidelines and recommendations" for such a rating system.

The Act also requires the FCC to prescribe regulations, in conjunction with the electronic manufacturing industry, requiring that television sets manufactured

after February 1998 include "features designed to enable viewers to block display of all programs with a common rating, generally referred to as the "V-Chip."

In addition to the FCC process, the current US television program rating system continues to be reviewed by a number of Committees of the Senate, and House of Representatives. There could be some changes made to the American ratings system. But as of this filing, there is no firm indication as to when that could happen, the degree that modifications could be made to the current system, or when a final US ratings system will be in place.

During the process of developing the Canadian ratings system, AGVOT and the secretariat which supervised the development of the US system shared information on the independent evolution of the two systems.

Two formal meetings were held with the executive of the American Implementation Committee comprised of Jack Valenti, President of the Motion Picture Association of America; Edward Fritts, President & CEO of the National Association of Broadcasters; and Decker Anstrom, President & CEO of the National Cable Television Association.

SUMMARY CONCLUSIONS

Canada is admired and envied around the world for its progressive and sensible approaches in dealing with one of the most complex and emotional issues of our society, violence on television.

We have addressed the problem in typically Canadian fashion. We have eschewed confrontation and encouraged co-operation and innovation. We have built on consensus, and engendered co-operation and respect between the broadcast industry, the regulator and the government in order to work towards the common good. We have sought the views of Canadian families and concerned interest groups as we worked towards a classification system.

Canada has the best framework anywhere to deal with violence on television. We have stringent industry Codes. We have the Canadian Broadcast Standards Council. Canadian pay and pay-per-view services were the first in the world to rate their unedited feature films. We produce the best non-violent children's programming in the world. We are the only country to have tested V-chip technology, not once, but four times. With the Commission's approval, we will soon have a classification system that works with the V-chip. We have done better than most countries, and have avoided the acrimony and political posturing extant in other jurisdictions.

In this report we are submitting a solid classification system for violence in television programming. It tests well with consumers, and is supported by extensive and serious research. It answers the criteria set by the Commission.

The comprehensive Canadian Television Rating System which the industry intends to adopt includes other content elements, and moves the industry beyond the expectations of the Commission. Canadian programming services are voluntarily undertaking to provide even more information to parents.

With the approval of the Canadian Television Rating System for violence, broadcasters can begin encoding their programming by the end of September. However, there are caveats to that commitment, complicating factors beyond our control. There are issues which need to be settled before full implementation in Canada is possible.

There are serious technological problems, as well as limitations on the software. The encoding software for example, is less than reliable, a critical factor for programming services which will be adding this rating information into their main programming stream. Certain program elements which should be encoded - promotions and movie advertisements - will have to wait until the technology catches up.

While consumers support the concept of V-chip technology and can see its value as a means of monitoring their children's television viewing, they want it built into their television sets.

As the research indicates, there is a high degree of public support and interest in harmonization of the Canadian system with the American system. We have that now. However, the Americans are uncertain of their direction and timetable.

One cannot discount the importance of the compatibility issue.

- The Commission talked about the opportunity to "promote a common North American classification system which is user-friendly and effective", when it released Public Notice 1996-36.

- The Minister of Canadian Heritage - the Hon. Sheila Copps - remarked in May 1996 that "It's more important to have a harmonized system than it is to do it early."

- In our public opinion research, Canadians say they want compatibility, to lessen their confusion in using the ratings system along with the V-chip.

- Those who used the V-chip in their home for a month said they strongly support ratings systems that are the same or similar.

While the system that we are submitting to the Commission has tested very well, at the suggestion of the AGVOT Classification Committee, we plan on two minor changes. After having lived and worked with the system for a month, the programmers suggested modifying two of the rating designators - the nomenclatures. They propose that 'FAM' (Family) be changed to a 'G' (General), as it is more reflective of the broad range of programming which would fall under this rating and has a familiar connotation to most viewers. They also suggest

changing 'PA' (Parental Advisory) to 'PG' (Parental Guidance), as this term is well known to parents through the movie ratings. Any changes would be only to the nomenclature, and not to the violence content guidelines and descriptors.

We are continuing to work on solving the technology issues, and on harmonization of the three Canadian systems. Our technical experts acknowledge it will be problematic if Canada maintains 3 to 4 different rating systems, as it is highly unlikely that all these systems can be accommodated in V-chip equipped television sets - the clear preference for consumers.

Canadian programming services and cable companies have demonstrated, by means of the considerable resources and effort they have expended on developing the rating system and the new generation of V-chip technology, that they accept their responsibilities towards Canada's children.

We respectfully request the Commission approve the Canadian Television Rating System for violence, which is clearly supported by solid public opinion research. This is the beginning of a new dialogue with viewers. It is another principal element of the Canadian approach to violence on television; an approach that is unequalled in the world.

We also wish to continue the positive, co-operative approach regarding a timetable for implementation that will best meet the public's needs, and ensure a successful introduction of this new instrument to protect children.