



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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| In the Matter of |) | |
| |) | |
| Applications Filed by Comcast |) | |
| Corporation, General Electric |) | MB Docket 10-56 |
| Company and NBC Universal Inc. |) | |
| For Consent to Assign Licenses |) | |
| Or Transfer Control of Licensees |) | |

COMMENTS OF COMMON SENSE MEDIA

Common Sense Media (“Common Sense”) hereby submits comments in the above captioned proceeding.

Common Sense is one of the nation’s leading nonpartisan organizations dedicated to improving the media lives of kids and families. Its mission is to educate and empower parents and teachers about the media that our kids collectively see, hear, and share in the 24/7 multi-media, broadband world. Common Sense provides information about digital literacy and media education in schools and community settings, as well as trustworthy ratings and reviews of all forms of media (i.e., movies, television shows, video games, music, mobile apps, books) so that millions of families and educators are enabled to decide which media and technology are appropriate for their children.

The Commission is seeking comment in this proceeding because Comcast Corporation (“Comcast”), General Electric Company (“GE”), and NBC Universal (“NBCU”) (and collectively “the Applicants”) have filed applications seeking consent to assign and transfer control of certain broadcast, broadcast auxiliary, satellite earth station, private land mobile, and private fixed microwave licenses to a new limited liability company that would be a joint venture

of GE and Comcast (the “Joint Venture”).¹ Given the importance and magnitude of this transaction on a national basis, Common Sense believes it vital to comment on the impact that this Joint Venture will have on children’s programming and how the public interest can be served through the Applicants’ fulfillment and follow through on the sixteen “voluntary public interest commitments” made in Appendix 8 of their Application.

Common Sense believes that approval of the transaction should be conditioned upon the Applicants fulfilling their voluntary public interest commitments with respect to diversity, localism, competition, and innovation, and in particular those commitments that specifically touch programming and interactive content and media targeted to our nation’s children and families.

DISCUSSION

The Applicants have made a series of commitments in the Application to better serve the public interest, including expanding the availability of local and public interest programming (Commitment 2), using On Demand and On Demand Online platforms and a portion of the NBC O & O’s digital broadcast spectrum to speak to kids (Commitment 3), committing to clear and understandable on-screen TV ratings information for all covered programming across all networks and applying the cable industry’s best ratings standards for on-screen ratings information (Commitment 4), growing partnerships with nonprofits like Common Sense so that parents can easily find tools and information about media and schools have corresponding media education programs (Commitment 5), and expanding over-the-air programming to the Hispanic

¹ *Applications for Consent to the Transfer of Control of Licenses, General Electric Company, Transferor, to Comcast Corporation, Transferee, Applications and Public Interest Statement* (filed Jan. 28, 2010) (“Application”).

community – and, by extension, to children in the Hispanic community (Commitment 6). (See Application at 42-47, Appendix 8.)

Common Sense applauds the Applicants for these commitments and for the significant steps that Comcast has already taken in these areas, and hopes that other corporations will follow their lead. Parents need improved tools and information because the rapidly evolving electronic media landscape presents families with both transformative opportunities and critical challenges. Our children are growing up in a technological revolution in which they are connected 24/7 to interactive video, the Internet, and mobile devices. Shocking new data shows that the average child now spends nearly *eight hours a day* with media and digital activities.² The time spent with media is more than children spend collectively with their families or in school, and it profoundly shapes their social, emotional, cognitive and physical development.

Common Sense believes that the responsibility of raising a generation of children to use media wisely and well involves many people and institutions, including not only parents, educators, and policy makers, but also industry leaders like the Applicants. Further, educators and parents must have tools and information to teach our nation’s children the digital literacy and citizenship skills they need to use media responsibly and ethically in our current 24/7 broadband world. Comcast is already a leader in bringing resources and information to parents, and Common Sense believes that, through this Joint Venture, the Applicants will have a unique opportunity to maximize their leadership position in the media industry by fulfilling specific commitments to:

1. Improve access to information, guidance, and age-appropriate ratings for parents and all consumers, on all of the Applicants’ platforms;
2. Expand a national public awareness campaign on digital literacy and citizenship; and

² “Generation M2: Media in the Lives of 8- to 18-Year-Olds,” Kaiser Family Foundation, January 2010 – <http://www.kff.org/entmedia/mh012010pkg.cfm>.

3. Fund and facilitate local digital literacy and citizenship programs.

(1) Improve Access to Information for Parents and Consumers on All of Applicants' Platforms

As Comcast Chairman and CEO Brian Roberts said in December 2009, the merger of Comcast and NBCU “will allow us to become a leader in the development and distribution of multiplatform ‘anytime, anywhere’ media that American consumers are demanding.” That leadership position makes the Applicants especially well positioned to distribute better information to parents. As importantly, the Applicants should commit to a significant investment in marketing and promotion so that parents know where to find the information, and how to use it to manage all of the video and other digital content that their kids can now access through multiple platforms.

Comcast has already taken important steps, for example by providing age-appropriate movie reviews and parent tips on their video-on-demand platform and in other areas, including Fancast and Fandango online properties. In addition, the Applicants have committed to work with nonprofits like Common Sense to carry across their distribution platforms more extensive programming information and parental tools as they are developed. (See Application at 46-47.) Expanding on that commitment, the Applicants should incorporate Common Sense ratings and parent information into Comcast’s Interactive Program Guide, emerging On Demand and On Demand Online platforms, and other advanced platforms in development, including mobile phones and devices. Improving access to this information will:

- **Foster informed parental choice.** Parents who are empowered with more information about media content can make better choices about the media that is – or is not – appropriate for their families.

- **Strengthen parental controls.** Parental control tools would be improved significantly if parents could use them to access ratings and information from Common Sense or other independent organizations.

By improving access to – and promotion of – parent information, the Applicants are poised to set a powerful example for other industry players. They could build on the work of DirecTV, which recently incorporated Common Sense ratings and information into their Interactive Program Guide and is promoting these new, more accessible tools through advertising on their channels.³

Parental demand for independent, third-party ratings is demonstrated by the growth of Common Sense, which has more than 1.3 million unique visitors to its website each month and now offers more than 10,000 ratings and reviews of movies, television shows, video games, websites, mobile phone apps, and other media content. Ratings from independent organizations like Common Sense help simplify the converged digital world and guide families in selecting content.⁴

(2) Expand the National Public Awareness Campaign on Digital Literacy and Citizenship

The Applicants have also made a public commitment⁵ to join other industry leaders and contribute media distribution resources to a public awareness campaign around digital literacy and citizenship: Time Warner Cable, DirecTV, Cox Communications and Comcast have each committed \$10 million or more in distribution resources. Common Sense applauds the commitment of these companies and urges the Applicants to provide additional support –

³ See examples online at <http://www.directv.com/DTVAPP/global/article.jsp?assetId=P6140053>

⁴ See Letter from Benton Foundation, Common Sense Media and the Coalition for Independent Ratings to Chairman Martin and Commissioners Tate, Copps, McDowell and Adelstein, dated November 7, 2008. This Letter urged the Commission to improve the V-Chip through the addition of third-party ratings.

⁵ Application at 46.

including through their broadcast networks, local broadcast stations, cable networks, and other platforms – for targeted public awareness efforts over both the short and longer term.

The multifaceted public awareness campaign promoting digital literacy and citizenship will highlight the positives of digital media and technology and reassure families and communities about how they can manage the potential negatives. This national campaign will be a crucial step toward educating parents, educators, and young people about ways they can be smart and responsible with digital media. The campaign will also meet the National Broadband Plan recommendation that “the private sector and non-profit community should partner to conduct a national outreach and awareness campaign.”⁶ The Applicants’ ability to communicate through broadcast networks, local broadcast stations, cable networks, online platforms, theme parks, movie theaters, and other platforms would significantly increase the reach of the campaign, and bring essential messages about digital literacy and citizenship to a significant proportion of American families.

Common Sense outlined the principal elements of a similar effort in comments to the Commission about the need for a Broadband Opportunities Awareness Campaign, submitted on November 23, 2009,⁷ and referenced in Recommendation 9.7 of the National Broadband Plan.⁸

In this proposal, we outlined:

- Key Audiences to Reach
- Media Strategies for Reaching Key Audiences
- Key Campaign Messages and Themes
- Partnering with Major Media Companies
- Partnering with Schools and Community Groups for On-the-Ground Outreach
- Ongoing Outreach with Community and Advocacy Organizations Leadership from Policymakers and Government Institutions

⁶ See <http://www.broadband.gov/plan/9-adoption-and-utilization/#r9-7>

⁷ See generally <http://fjallfoss.fcc.gov/ecfs2/document/view?id=7020349837>.

⁸ See Footnote 125 of Chapter 9 at http://www.broadband.gov/plan/9-adoption-and-utilization/#_edn125.

- Budget Outline in Brief

(3) Fund and Facilitate Local Digital Literacy and Citizenship Programs

As part of a commitment “to further Common Sense’s digital literacy campaign”,⁹ the Applicants should fund and facilitate local digital literacy and citizenship programs across the country. Local businesses play a vital role in communities and local school systems, and the Applicants – especially through 26 NBC and Telemundo owned-and-operated stations and hundreds of affiliated stations – could be highly effective local partners, supporting schools and community groups in their efforts to build digital literacy and citizenship programs.

As Common Sense has noted in comments submitted in other Commission proceedings, it takes coordinated efforts by many players to prepare our children to live, learn, and thrive in a digital media world. Our country needs digital literacy and citizenship programs that will help children understand how digital media impacts the way they socialize, communicate, gather and assess information, and engage in political and economic activity. Families and educators need to teach children how to be media savvy and safe, to search for age appropriate content, and to be careful and ethical with regard to their own digital conduct. And to do this, parents and teachers need guidance and training.

Through its work, Common Sense has learned that there are several steps needed to develop comprehensive digital literacy and citizenship programs in schools and communities. These steps include:

1. Funding professional development for educators and community leaders.
2. Helping distribute basic resources for educating teachers, parents, and kids, and help schools and community programs access them.
3. Delivering education/technology resources in underserved schools and communities.

⁹ Application at 46-47.

4. Ensuring that digital literacy and citizenship are essential parts of every school's basic curriculum.¹⁰

With support from the MacArthur Foundation, the Hewlett Foundation, and the Sherwood Foundation, Common Sense has already created digital literacy and citizenship pilot programs in schools in Omaha, the San Francisco Bay Area, New York City, and Maine. Corporate support and involvement will be keys to building similar programs in other communities, and media industry leaders like the Applicants are ideal partners for these local programs.

Chairman Genachowski recently recognized the importance of public-private partnerships in broadband and education in his speech to the International Telecommunications Union in Hyderabad, India:

Also, the U.S. cable industry has announced a program to subsidize broadband connections to certain households with schoolchildren. We are working with the cable industry on this "A plus program," and other American industries on other partnerships. These can and should be an important part of the effort to provide learning support for students at school and at home.¹¹

The A plus program is an excellent idea, and the Applicants should lead the industry in building and supporting local digital literacy and citizenship programs around the country.

CONCLUSION

Digital media is changing the ways that kids live and learn – and the changes can create opportunities or pose potential dangers. As a nation, we need to manage the role of media in our children's lives to ensure that they harness the educational and creative powers of digital media

¹⁰ See Digital Literacy and Citizenship in the 21st Century, a Common Sense Media White Paper <http://www.common sense media.org/digitalliteracy>.

¹¹ Prepared Remarks of Chairman Genachowski, "Connect a School, Connect a Community", World Telecommunications Development Conference, International Telecommunications Union, Hyderabad, India – May 25, 2010 – http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-298395A1.pdf

while avoiding the potential negatives. To do this, we need better tools and information for parents, teachers, and children themselves.

Accordingly, the Commission should ensure that a grant of the assignment and transfer of control of these underlying licenses is conditioned upon the Applicants fulfilling their voluntary public interest commitments with respect to diversity, localism, competition, and innovation, and in particular those commitments that specifically touch programming and interactive content and media targeted to our nation's children.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alan Simpson', is written over a horizontal line.

Alan Simpson
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