

**STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL,
DISSENTING**

Re: *Children's Television Programming Rules, Modernization of Media Regulation Initiative, MB Docket No. 18-202, 17-105, Report and Order and Further Notice of Proposed Rulemaking (July 10, 2019)*

Take it from the only mother serving on the Federal Communications Commission, being a parent is not easy. My kids are my sweetest accomplishment and greatest source of joy. But they are also a reliable source of exhaustion. As every mother knows, every little thing that makes it easier to get through the day with your children healthy and safe is a thing you can get behind and support.

That is why I think the Children's Television Act is so important. It requires us to limit advertising and during the license renewal process consider how a station has served the educational and informational needs of children. To implement this law, the agency suggested stations provide three hours of children's content a week. For those keeping tabs, that is less than two percent of their total broadcast time.

I don't think that's burdensome. I think it's beneficial.

I know a lot has changed since this law was passed. Gone are the days of Saturday mornings when kids gathered around the glow of the television clad in pajamas, waiting for their favorite program to come on air. Today, many of us can call up a range of kid-focused content when we want it and where we want it. But shame on us for deciding that this has rendered children's television policies obsolete. Shame on us for using this as an excuse to cut children's television and make it harder for parents to find safe content on the screen.

That's what we do here. Today the FCC decides that we can cut these policies because in the internet age they are no longer needed. Nothing could be further than the truth.

We have a digital divide in this country. Broadband is not available everywhere. Our own statistics show that millions and millions of households have no access to the internet. That includes a quarter of the low-income households with children under 8 at home. Some of them live in rural areas, some of them simply cannot afford it. Remember that 8 in 10 Americans live paycheck to paycheck, many of them with young children in their homes. On top of that, many Americans who can afford this service have limitations—like data caps that prevent them from watching much video on their screens.

Plus, that internet viewing comes with its own problems. While there is quality content to be found, a whole lot of videos aimed at children are not so enriching and may be collecting information about the kids who are watching. In fact, our colleagues at the Federal Trade Commission are now investigating how online video providers may be violating the privacy of children. This follows on the heels of reports that automated recommendation systems can promote disturbing images of young children, rolling on the screen, one after another. I know, as

a mother, I am not at ease when my kids sit down before the computer and rely on algorithms to deliver their next video. There is so much that is new and not easy to navigate as a parent in the digital age.

So I don't think there is anything wrong with this agency keeping in place the fundamentals of the Children's Television Act. I am open to modernizing these policies and had many conversations with my colleague, Commissioner O'Rielly, about just that. But in the end, I believe our policies should support the day-to-day challenges so many parents face to keep our kids safe. As a result, I am saddened that today's order slashes so much of our children's television policies. We make it harder for parents to find content by reducing regularly scheduled programming. We shuttle off programming to multicast streams that most people don't watch and few parents are ever likely to locate. Then we issue another rulemaking, suggesting our effort to cut children's television is going to continue.

I am disappointed—as a policymaker and parent. I dissent.