Are children going to continue to serve television by providing a trusting audience for its commercial message, or is television going to begin to serve children? Current children's programs are designed for the sole purpose of holding the attention of the broadest age span possible. Today's television fails to enhance the small child's surroundings and fails to show him constructive actions he can copy to resolve his own problems. During one period of monitoring children's cartoons in the San Francisco Bay Area, it was found that dramatic characters engaged in seven times as many destructive as constructive actions, and that 79% of the destructive actions were rewarded. Broadcasters have ignored the Federal Communications Commission (FCC) requirement of ascertaining the needs of their community by disregarding the needs of children. If the FCC insisted that children be included in the process of ascertaining community needs, networks would start providing more adequate programs. Until the FCC starts enforcing its ascertainment requirements, there will be no significant change in the content of children's programming. (MG)
The position of the Committee on Children's Television (CCT) of San Francisco, California as presented by Neil Morse to the panels on children's television before the Federal Communications Commission October 2, 1972.

Washington, D.C.

There was a child went forth every day, and the first object he looked upon, that object he became, and that object became part of him for the day or a certain part of the day or for many years stretching cycles of years.

Walt Whitman
The question we are confronting today -- whether children's television programming should be directed at specific age groups -- goes to the heart of the challenge confronting commercial television today: Are children going to continue to serve television by providing a trusting audience for its commercial messages, or is television going to begin to serve children?

We are told that this season's programs are improved. Yet, all we find are the same old formulas with some new gimmicks that are designed to mislead the public so that television can continue to attract child viewers to the advertisers' message. ABC's innocuously titled "Superstar Movie", promoted as a series of original animated films for children like "Oliver and the Artful Dodger" based on Dicken's Oliver Twist, in reality features such monsters as "Frankenstein", "Dracula", and the "Mummy and the Invisible Man". CBS's subterfuge, "The Scooby Doo Movie" turns out to feature "Batman" and "The Three Stooges" -- programs CCT had been informed had been shelved at great financial loss to the industry because the industry had recognized its social responsibility. ABC's "Brady Kids", which many parents read to be a cute animated take-off on the family situation comedy "The Brady Bunch", has been transformed into a weekly adventure series that revives oldies like "The Lone Ranger" and "Superman". CBS's "Chan Clan" and ABC's "Tonto" have outraged the minority communities. This season's new emphasis of mimicry of adult programming is epitomized in NBC's "Runaround"; a children's game show "just like one Mommy watches" that had one child contestant so upset that she fell on the floor crying hysterically. Can it honestly be said that these programs are designed for any other purpose than to hold the attention of the broadest age span possible? One cannot perceive any effort or attempt to get any of the varying needs of this diverse population which broadcasters lump together as children.

The fundamental requirement of a television licensee is that it serve the needs and interests of the community in which it operates. Roughly 25% of any
Children Have A Broad Range Of Needs And Interests Which Television Can Serve

Needs And Interests Vary And Change As Children Grow And Develop

Young Children Require A Strong Sense Of Security

Fantasy And Reality Are Frequently Confused By Young Children

community in the U.S. is children under 14 - children who spend more time watching television than attending school. What is television doing to serve their needs and interests? The needs of a three year old are obviously different from those of a twelve year old; yet, with few exceptions, commercial television does not indicate an awareness of the differences. Today's children's programs suggest that all broadcasters can discern in children is the need to be distracted which the broadcasters refer to as a need to be entertained. In their blind frenzy to serve the "need" to be entertained, commercial broadcasters have ignored nearly all the fundamental needs of children for which society traditionally attempts to provide. Needs which deal with a child's emotions, education, sexual development, culture, ethnic and national heritage. Needs that are enhanced by stimulating and enriching experiences. Needs for intellectual growth and the opportunity to acquire a sense of self-worth. Needs to learn about one's surroundings and to have socializing experiences in order to find a place in the surroundings.

Psychologists and sociologists tell us that the ways to serve these needs varies according to different stages of a child's development. For example: the need to learn about one's surroundings is different for a young child than for an older child.

The young child's world is his home and he needs to feel secure in this environment before he can venture elsewhere. Because the young child doesn't engage in abstract thinking and has no sense of time and place, his television experience is a real part of his concept of the world. A Sesame Street cast member asked a young viewer where he lived. The child was incensed! He said: "You know where I live, you are there every day." For a young child, Vietnam is just around the corner and the bombs are falling on a neighbor's house. To a young child, cartoon characters are real and they are alive in his world because a young child cannot distinguish between fantasy and reality. The young child's life is further
CCT Study Demonstrates Destructive Effects Of Present Programming On Young Children.

Older Children Must Develop Self Esteem Competency And A Sense Of Competency In Dealing With Their Environment.

Children Adopt Many Television Figures As Role Models.

The older child's world has expanded beyond family to include a larger community in which he is striving to develop social skills. His physical strength is developing and he is becoming more aggressive. His predominant need is to develop a sense of self-esteem and competency about the many tasks he undertakes to learn to master his environment. These tasks require the older child to learn to "cope". He has to learn to handle frustration, he has to learn to channel his aggression constructively, and he has to learn many elaborate sets of rules that children develop regarding their socializing experiences at play and in relating to other children and adults. Through all of this, the older child needs to have permission to have feelings and he needs to have models that show him how to express these feelings effectively. And the older child needs fantasy for now that he has the ability to abstract he can utilize fantasy to act out his dreams of how he's going to fit into the world.
Present Programming Fails To Fill Needs And Interests Of Older Children

Broadcasters Must Be Aware Of Needs And Interests Of Children Before They Can Serve These Needs And Interests

Broadcasters Have Ignored The FCC Requirement Of Ascertaining The Needs And Interests Of Children

Broadcasters Failure To Ascertain Has Been Documented In CCT Reports

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Today's television programming is painfully frustrating for older children. It does not respect their intelligence; it does not respect their boundless interests and need for information which will help them to develop physical, verbal, and intellectual skills; it does not respect their need to have constructive examples of coping or constructive ways to channel their aggression; and television provides them with few fantasy experiences in which they can play out roles which will help them to establish their place in their environment and plan for their adulthood.

Commercial programming will not begin to serve the needs of children until broadcasters make efforts to study children of different developmental levels and determine what their needs are. This is why CCT feels that the most significant step the Commission could take in its efforts to improve the quality of children's programming is to give force to its existing regulations regarding Ascertainment of Community Needs.

Every licensee is required to ascertain the needs and interests of the community he serves, yet in terms of the way in which most stations carry it out, the obligation exists only in theory. In a report filed with the Commission last year, CCT has documented the failure of each of the commercial stations in the San Francisco Bay Area to ascertain the needs and interests of children. These studies not only demonstrated that the stations had not recognized the existence of a substantial portion of their viewing audience, but that stations acknowledged that they were not interested in serving the children. When the studies pointed out that local Bay Area programming for children had dropped from 17-1/2 hours per week to 0 hours per week, the stations pointed out that it was more practical to let the networks take up the slack and that local stations did not have any vehicle through which they could influence network decisions. We regard that as unacceptable buckpassing. CCT contends that, if the
Failure To Ascertain The Needs And Interests Of Children Precludes Programming designed To Serve Those Needs And Interests

Parents' Protests Unheeded

Best Hope From Children's Programming lies in FCC Enforcement Of Ascertainment Requirements

licensee carried out its legal obligation by engaging in a comprehensive and thorough program of Ascertainment, licensees could actually discover something about children's needs and could air programs to serve them. A licensed station's efforts to develop local programming for children would flow directly from its efforts to contact educators, child specialists, parents, and others concerned with children in its community and could reach a consensus of which needs of children were most important at which stages of development. For the balance of its children's schedule, a local station would assemble programming from networks and syndicators that it needed based on its ascertainment studies. The networks are not licensed, and yet they will necessarily provide programming which individual affiliates collectively require if those requirements are clearly specified. Once local stations are explicitly required to base programming decisions on the needs of children of different levels of development, networks and syndicators will work to produce programming that fits those specifications.

For years parents have protested against the failure of commercial television to provide decent children's programs and for years the networks have promised to do better. For years broadcasters have fallen back on the excuse of parental responsibility while denying parents adequate information on which to base programming choices for children. A glance at this year's schedule is sufficient to see why the industry has never applied its promotional capacity to sell children's programming to parents. Until the Commission acts to enforce a requirement on individual licensees to ascertain children's needs as we have suggested, there will be no significant change in the content of children's programming. The Commission in enforcing its ascertainment requirements, would be reaffirming the fundamental principle of the
Communications Act that the responsibility for television program service lies with the individual licensee and that the licensee must act in the public interest to serve the needs of the various elements of its viewing audience.
Dear Chairman Burch:

I wish to submit CCT's written position on age specific programming and ask that it be included in the formal record of the Federal Communications Commission panels on Children's Television Programming.

CCT, the organization I represent, is a group of 65 ethnically diverse educators, professionals, parents and concerned individuals formed to promote quality television programming for the children of the San Francisco Bay Area.

CCT contacted many sources to verify facts while developing this paper for the FCC panels. I wish to acknowledge the assistance provided CCT by the following people and groups: Eva Maas, M.S.W.; George Conklin, United Church of Christ, San Francisco; Velia Forst, M.S.W., Michael Shapiro, CTW, San Francisco, Jane Kenner, Creative Writer; George A. Williams, Jr., Social Planner; Linda H. Ormiston, Ph.D., Kathy Fong, Chinese Media Committee; La Raza; The Coalition for Media Change, the American Indian Historical Society, A.C.T. and others. Collaborating on the application of these facts to develop the position paper were: Paul J. Mundie, Esq., Sally Williams, Executive Director of CCT, and myself.

Thank you for giving me the opportunity to provide the Commission with information which will assist you in reaffirming to broadcasters their role in the development of programs specifically directed to the advancement of community culture and education.

Sincerely,

Neil Morse
Vice-President, CCT
2 October, 1972