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ABSTRACT

The origins, development, and effectiveness of Action for Children's Television (ACT) are examined in this pamphlet. The strategies used by ACT to obtain change at the congressional level and within television stations and networks include the following: a "tuneout" day when people are urged to turn off their television sets, a boycott of certain advertised goods, the "Bent Antenna" award for the poorest taste in children's television programing, and lobbying and the consolidation of public pressure. Special attention is given to ACT's successful attempt to alter government agency standards for the advertising of certain food items and toys during children's prime television-watching times. (KS)

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SCHOOL OF JOURNALISM, UNIVERSITY OF MISSOURI AT COLUMBIA
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FREEDOM OF INFORMATION REPORT NO. 364

ACTION FOR CHILDREN'S TELEVISION

This report was written by Donald P. Raaly, Associate Professor at the University of Missouri School of Journalism, as part of his doctoral dissertation, The Challengers: Social Pressures on the Press 1965-1975.

Introduction

Some of the many pressure groups concerned with the media that arose out of the sixties died quietly in the early seventies—some even before the seventies. But some of them have been unusually successful in what they set out to do. And if they have not been successful, they have at least been persistent.

Action for Children's Television deserves detailed treatment because it is an example of middle-class activism working within the system, using many of the techniques and approaches employed by what some would call more "radical" groups. Almost from the beginning, ACT knew how to use the news media to publicize what it was doing. Second, it came to know the law and the governmental agencies and how to "get to" them. Third, it used tactics designed to gain attention: a "tuneout," a day when people were urged to turn off their television sets; a boycott of certain advertised goods; annual "rallies"; the "Bent Antenna" awards for the poorest taste in children's television; a game called "Switch," which was to teach children and their parents how to enjoy turning off their television sets.

Most of all, ACT deserves attention because the group is larger, better organized and financed, and probably more determined than ever to add to the improvements it thinks it has made in programing for the young viewing audience.

Origins

Like many groups, ACT began unpretentiously, and for various reasons, broadcasters first experienced some difficulty in taking the group seriously.

As Leonard Gross wrote in *TV Guide*, the origins of ACT "are like a democratic dream."[1] After all, Gross said, in a democracy, when someone is disturbed by something in society, he or she should be able to do something about it.

In this case, the perturbed person was Peggy Charren, "a nonworking-working housewife" in her middle 30's, who lived in Newton, Massachusetts, a suburb of Boston with her husband, a plastics manufacturer, and their two daughters. Mrs. Charren had worked in commercial television in New York. She had also owned and operated a print gallery in Providence, Rhode Island, started a company that organized children's book fairs in Boston and served as chairman of the Newton Creative Arts Council.

One day while Mrs. Charren was watching her 3-year-old absorbed in front of a TV set, she decided television programing for children could be improved. More specifically, she came to believe that in the eight years since her older daughter had watched the same kinds of programs, the incidence of violence had significantly increased.

One day when she noticed that a "very violent movie" had been aired during Christmas vacation, she called a local station to ask why it had been scheduled at a time when children were very likely to be at home watching. A station official replied that the movie had been selected precisely because children would be at home watching at that time. "That they didn't even think to question it indicated that not enough people were paying attention," Mrs. Charren said, (*Wall Street Journal*, 8-5-74).

Mrs. Charren spoke to some of her friends about her concerns, and finally got a group of them together to discuss the subject. "We asked ourselves the kinds of questions a group of citizens should ask when they decide to change something in the system that isn't working right."[2] Fifteen friends, neighbors, teachers and pediatricians were at that first meeting, all concerned, but with little knowledge of how to proceed. "All we had were gut reactions," Mrs. Charren said, (*Wall Journal*, 8-5-74). "And there's no better way to make people pay no attention to you than to speak from no knowledge."

But four people whom Mrs. Charren contacted also wanted to change something in the system badly enough to begin doing something about it. They had at least one thing in common—they were all mothers.

Mrs. Evelyn Sarson, a native of England, formerly employed by the Reuters News Agency in Paris and the *Guardian* in Manchester, England, wife of a producer, also British, for public TV's WGBH in Boston, mother of two, served as the first president of the group.

Summary:

The author provides detailed information on the origins and development of ACT—one of the most successful citizen pressure groups to emerge from the sixties. This is the second paper published by the Freedom of Information Center on this group. The earlier report, "Action for Children's Television (ACT)," No. 265, by Melinda Elledge, was published in August, 1971.

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Mrs. Judith Chalfen, graduate of Smith College, previously employed in both commercial and educational television, founder of Everyman's Theatre, the first "experimental" theater group in the Boston area, wife of a building contractor, mother of three, served as treasurer.

Mrs. Joann Spiro, graduate of fine arts from Boston University, free lance designer, wife of a supplier of architectural and graphic materials, mother of two, served as a research assistant.

Mrs. Lillian Ambrosino, graduate of Cornell University (B.A.) and of Harvard University (M.Ed.), former producer of educational radio programs, newspaper reporter, teacher and communications researcher, wife of an employee of Boston's public television station, mother of three, served as an executive committee member.

The women did receive help. Mrs. Sarson wrote in early 1971 that four men were serving as advisers to ACT: Dr. Milton E. Akers, executive director, Education of Young Children, Washington, D.C.; Dr. Richard Galdston, chief, in-patient psychiatric consultant service, Children's Hospital Medical Center, Boston; Dr. Hyman H. Goldin, associate professor of communications, Boston University School of Public Communications; Richard Lewis, poet and editor, director of Touchstone Center for Children, New York.[3]

The group first became involved in a local issue. WHDH-TV in Boston had expanded its CBS morning news and reduced "Captain Kangaroo" from an hour to a one-half hour broadcast. The group demanded, through a letter-writing campaign and pickets, that the Captain regain his full hour. Their first battle ended in victory, and the group had received the encouragement to continue its crusade for children's television.

For at least a year, beginning in 1968, they did their homework—reading the magazines of the broadcasting industry, monitoring televsion programs, talking to local broadcasters. After they thought they knew what they were talking about, they traveled to New York to speak with the network executives.

Recalling that visit to New York, Mrs. Charren said in *TV Guide*:

> We were looking for the answer to why television was like it was. It was the broadcasters who, in answering that question, established ACT's goals. What the broadcasters said was children's television is like it is because it exists only to meet the needs of the 2-to-11-year-old market. When you get a program format that's successful, you keep employing it because you want the largest part of the 2-to-11-year-old market to see the commercial.[4]

What the New York executives were telling the "Boston mothers," as they soon came to be known, was that children in that age group had been identified as a separate, specific market and therefore, as an independent profit center that could be appealed to.

ACT Goes to Washington

Not long after the New York visit, Mrs. Sarson was testifying before the subcommittee on communications of the Senate Commerce Committee, saying that the FCC is unable to cope "with an industry that has expanded tremendously in two decades."

The subcommittee hearings concerned Senate Bill S. 2004, which would amend the Communications Act to establish orderly procedures for the consideration of application for renewal of broadcast licenses. Mrs. Sarson opposed S. 2004, explaining that the FCC "does not have any definitive criteria by which to judge a station, other than the nebulous 'serving the public interest, convenience and necessity,'" adding: "The FCC has rarely found any broadcaster guilty of not meeting this requirement." What the FCC needed were "standards and guidelines" by which it could evaluate a station's performance. She then offered as examples ACT's proposed guidlines for children's television programing.

> Whereas: The interests of the public are best served when children are considered as a special audience and not as potential consumers.
>
> Therefore: The following rules should govern all programing for children:
>
> 1. There shall be no sponsorship and no commercials on children's programs.
>
> 2. No performer shall be permitted to use or mention products, services or stores by brand name during children's programs, nor shall such names be included in any way during children's programs.
>
> 3. Each station shall provide a minimum of 14 hours of programing per week for children as part of its public service requirement . . . Provisions shall be made for programing in each of the following areas within the times specified:
>
> A. Preschool: Ages 2 to 5: 7 a.m. to 6 p.m. daily; 7 a.m. to 6 p.m. weekends.
>
> B. Primary: Ages 6 to 9; 4 p.m. to 8 p.m. daily 8 a.m. to 8 p.m. weekends.
>
> C. Elementary: Ages 10 to 12; 5 p.m. to 9 p.m. daily; 9 a.m. to 9 p.m. weekends.
>
> These rules shall be enforced by the Federal Communications Commission. Infraction shall be grounds for revocation of license.

The next step for ACT was a logical and simple one. Evelyn Sarson sent the guidelines to the FCC. In her letter to the FCC on February 13, 1970, she wrote:

> We all know that television is important in the formulation of a pattern of values, attitudes and social philosophy that, once learned, can be difficult to change.
>
> The purpose of Action for Children's Television Inc. is to transform this powerful medium into a creative force. . . .

Mrs. Sarson also noted in the letter that ACT's guidelines for children's television were now a "part of the Congressional Record," thus making it difficult for the FCC to ignore.

Although the FCC had rarely ventured into the sensitive areas of content and program categories,[5] it gave public notice that it had accepted ACT's guidelines as a petition for issuance of a notice of proposed rule making and that it had assigned it file No. 1569. This meant that under the provisions of Section 1.405 of the Commission's rules "interested parties" could file statements through July 1, 1971, in support of or in opposition to the Commission's action.

The FCC's Joe Ryan, who wrote the notice of inquiry and proposed rule making, recalled in an interview: "We thought they were a group of little women from Massachusetts petitioning for their rights. Hell, they've got the best legal talent in this part of the country." By that time the group's attorney was Earl K. Moore, the communications lawyer who had long been active in helping groups deal with the FCC.[6]

The "little women from Massachusetts" received a lot of support. The FCC received 100,000 replies, a response without precedent, 90 percent of which favored ACT's proposals.[7]

Suddenly the group had to be taken seriously. As Bob MacKenzie of the Oakland *Tribune* wrote (3-31-70):

> When first proposed, that idea sounded excessively idealistic, if not downright un-American. No one had even suggested that television networks and stations, profit-making corporations that they are, ought to operate at a dead loss; even the public service programs required by the FCC guidelines are allowed to have sponsors, if they can find any.

According to The *Wall Street Journal* (10-22-70), ACT's proposal for no ads on children's TV would have cost the three major networks some $26.4 million annually in ads for games, toys and hobby craft products and another $57.1 million in revenues from breakfast cereal ads.

The FCC had split 4 to 3 in its decision to adopt the notice of inquiry and proposed rule making,[8] but FCC Chairman Dean Burch began making his views known concerning programing for children, and he sounded sympathetic to ACT's views. In March of 1970 he was quoted in The New York *Times* as saying (4-9-70), "It is, I believe, fair to ask whether broadcasters operating on public channels as public trustees have fully met their responsibility to children."

In September, 1970, speaking to the International Radio and Television Society in New York, Chairman Burch mentioned ACT's proposals and said: "Problems must be considered, weighed and solved, and the solution must often be implemented regardless of whether cereal or toy sales reach new heights—or not."

Support for ACT's Proposals

Chairman Burch had good reason to be concerned. Few could have predicted so much discontent with children's television. The FCC quickly accumulated 15 volumes of public sentiment.

Perhaps the biggest complaint voiced by parents involved the appeals made to their children to buy expensive "TV toys," which the parents could not afford. Another major concern of those who wrote involved advertisements for children's vitamins, or vitamin supplements. The individual program that perhaps received the most attacks was a series called the "Romper Room," on which, said the parents, the teacher reminded her young audience that only children with "real Romper Room toys" can fully participate in the "class" activities.

ACT's proposal to forbid performers from doing the advertising themselves was met with wide approval. Jeff R. Spalsburg, director of audio-visual services, Instructional Systems, Inc., wrote to Chairman Burch:

> I do not believe that the strong impact these performers have on children can be understated, overlooked or ignored. Children accept these people not only as friends of the family, but in some cases, as second parents."

Some parents were worried about the effects of television commercials in general. Some were opposed to the sheer number of commercials on children's television, pointing out that the National Association of Broadcaster's Code of Good Practices permits 16 minutes of commercials per program hour on children's programs, compared to eight during prime-time adult shows.

The Stations and the Networks React

Obviously, not everyone agreed with ACT's proposals, least of all, the networks and individual station managers. The biggest concern, right from the beginning and up to the present has been, who is going to pay for the programing? CBS said that ACT and other organizations had decided that commercial television should assume a role in education made necessary by the "alleged failings of the multibillion-dollar educational system in the United States.

The National Association of Broadcasters' filing with the FCC was devoted principally to what it said was the value of self-regulation through the NAB code and to "significant improvements in programing and advertising content" that had occurred at both network and local levels.[10] The NAB warned that the criticism stimulated by ACT's proposals might obscure the improvements that have taken place.

A press release from the NAB dated October 1, 1971, discussed an official comment it had filed with the FCC, stating that the NAB

> firmly believed that the young public is best served by a system of television which is unafraid to innovate and experiment, which proceeds to improve its broadcaster matter through regulation which is voluntarily carried out, not government enforced as ACT, NCCB, and others are urging. These parties have painted a picture of American Television which is both unfair and inaccurate and cannot go unchallenged if any useful or honest resolution of the issues in the docket is to emerge.

The NAB listed what it considered to be inaccurate statements and untenable conclusions in the petitions of ACT, and insisted that:

> —Requiring stations to offer 14 hours of children's programing and to eliminate associated commercial matter would not produce uniformly excellent children's fare.
> —Taken to its logical conclusion what ACT and others are seeking is a government owned, financed and managed broadcast operation like those found in many other countries.
> —Television has not been insensitive to public preference when it comes to changing its programing offerings.
> —Elimination of commercial broadcasting would seriously diminish quality caliber programing.
> —Every other country which presents children's television on a non-commercial basis has come up with a substitute means of financial support—yet

the petitioners expect American broadcasting to present such programing at its own expense. "Such a proposal is unworkable, inequitable and without precedent."

One of the most significant points to be stressed about American television, NAB said, was that it is "totally self-sustaining and genuinely free to its public."

Then the NAB predicted that elimination of advertising from children's programs in the United States "would sound the death knell for quality children's program fare."

An editorial entitled, "Child's play," in *Broadcasting* magazine on January 25, 1971, said that the year before, five housewives from Boston were given an audience by the FCC "to advocate nothing less than total federal control over television programing aimed at children." The editorial then reviewed a couple of ACT's proposals "and, oh, half a dozen other propositions too outlandish to be taken seriously." The writer said he could not believe that the commissioners "had sat through the pitch with a straight face," and called the proposed rulemaking "the deepest federal incursion yet into broadcast programing."[11]

ACT Attacks Toy Commercials

After filing their proposals with the FCC, ACT directors mailed letters on February 23, 1970, to all members of Congress asking for support.

In October of 1970, ACT joined the Boston University School of Public Communication and the Kennedy Memorial Hospital for Children in sponsoring a national symposium on children and television in Boston for "hundreds of professionals from medicine, social work, education, TV, broadcasting and advertising."[12]

After the symposium, ACT announced it would zero in on "toy marketers for their hard-sell yuletide campaigns."[13] ACT said it would distribute a four-page newsletter ("Christmas Survival Kit") and collect signatures on petitions to be sent to Toy Manufacturers of America. The petitioners would ask that toy makers improve the quality of their products and cease aiming their commercials solely at children. The Christmas drive was to focus on schools, community groups and shopping centers in Boston, New York, Washington, San Francisco and Chicago.

ACT also asked (*Christian Science Monitor*, 12-14-70) most of the country's leading television stations to run spot ads advising viewers of deceptive advertising of toys. The Federal Trade Commission had prepared charges against three well known toy manufacturers. Only a dozen or so stations had replied and most indicated that they would await the FTC's formal complaint against the toy manufacturers before making a decision. But, said the editorial, the stations were beginning to look closely at those ads because they could foresee a battle similar to the one waged over cigarette ads.

Actually, the group had done more than ask "most of the major stations" to run spot ads advising viewers of deceptive advertising of toys. ACT had requested the FCC in a letter dated December 10, 1970, to issue a public notice advising all television licensees broadcasting toy commercials "that they would make substantial time available for presentation of the view that these commercials are misleading. . . ." ACT based its request on the fairness doctrine, saying "that it is not in the public interest for broadcasting stations to continue to present commercial announcements which have been identified by responsible public authorities as deceptive. . . ."[14]

The FCC refused (*Christian Science Monitor*, 11-10-71) to rule on ACT's complaint. But on December 22, 1970, the FTC issued a joint statement with the FCC that the two groups had met to discuss possible joint hearings on television advertising.[15]

The FCC Issues Its "Notice"

Then on January 20, 1971, the FCC issued its notice of inquiry and proposed rule making. The Commission cited objections that had been raised to ACT's proposal, but said there were "high public interest considerations involved in the use of television, perhaps the most powerful communications medium ever devised, in relation to a large and important segment of the audience, the nation's children."[16] The FCC also said it did not have information on children's programing to decide whether it was good as it was or whether it needed improvement.

FCC Commissioner Nicholas Johnson said he approved of the FCC request for additional information, but he was disturbed that so little had been done about the ACT petition:

> In reality, this (the Notice of Inquiry and Proposed Rule Making) is simply another case of "Due Processing them to death." It is Kafkaesque that after 10 months, after 15 volumes of comments, this commission has to tell concerned parents that ". . . we . . . have reached no conclusion, tentative or final, on the desirability of a rule. . ." I believe that we should at the very least be ready by now to adopt specific proposals—those proposed by ACT or whatever our own ingenuity could devise —as a proposed rule making.[17]

To gain the information it said it needed, the FCC asked that stations submit a sample of programs for a "composite week": Sunday, September 13, 1970; Monday, February 16, 1970; Tuesday, June 23, 1970; Wednesday, April 8, 1970; Thursday, October 2, 1969. The Commission asked for the names, dates, time and lengths of such programs, along with descriptive summaries of them. It also asked whether the programs were entertainment or educational, original showings or reruns, who the sources and sponsors were, the products, stores or services advertised and the commercial time involved.

The president of ACT, Mrs. Sarson, said the Commission could get the material it wanted from reading the network program schedules and from watching television: "We could give the Commission a subscription to *TV Guide*. At least half of the questions they're asking are answered in it."[18]

In February, 1970, ACT moved again, this time with three other groups—the Council on Children, Media and Merchandising; the National Citizens Committee for Broadcasting; and the Office of Communication of the United Church of Christ—asking the FCC to require networks to make available at least one film or video tape of all programing and advertising during the "composite week." The Commission said ACT should go directly to the networks with its request, adding that it would reconsider the requests if the networks turned them down.

In March, ACT and the same three groups sent a letter to 120 television stations requesting that they broadcast a 30-second spot which said, in part:

> The Federal Communications Commission would like to know . . . what you would like to see on TV for children; what you feel about commercials aimed at children. In January the Commission published a notice of inquiry asking questions about kid's TV. Until May 3 (the original closing date—the time was extended several times, finally to October 1, 1971) they will accept replies from broadcasters, advertisers and the public.[19]

Also, to call attention to the original May 3 deadline, ACT initiated a "tuneout campaign" for May 1, asking that the nation's TV sets be turned off for the day.[20]

ACT's Influence Spreads

Two studies commissioned by ACT, "Programing and Advertising Practices in Television Directed to Children," by Ralph M. Jennings, and "Mother's Attitudes Toward Children's Television Programs and Commercials," by Daniel Yankelovich, Inc., appeared in 1970. The latter said that toys and games seen to be large and exciting on TV, often turn out to be "inferior." The misrepresentations, it said, lead to frustration, disappointment and tears. Often the child's anger is vented upon the parent, not the sponsor, thus making for a constant duel between children asking for things and mothers having to say yes or no.

Although they denied that ACT was the reason, all three networks designated special executives for children's programing.[21] NBC promoted public affairs director George Heinemann to vice president in charge of "children's program"; CBS hired Peabody Award winner Allen (Duke) Ducovny to oversee Saturday morning schedules, "Captain Kangaroo" and the "CBS Children's Hour"; ABC appointed Hollywood film director-producer Charles Martin Jones as first executive director of children's programing.

ACT was not impressed by the first "new season" under new management.

> Only three shows seem to have made any effort to break out of the eternal chase-and-fight routine: "Hot Dog" (NBC); "Tomfoolery" (NBC) and a series from Britain, "The Double-deckers" (ABC). The much publicized CBS "In The Know" segments which were described as four-minute news items turned out to be mainly commercials with a brief film insert lasting less than two minutes. Topics covered have included felling a tree, giant crabs, glass blowing and birds that fish. . . . They looked like old travelogue excerpts.[22]

The networks said they were doing more than "beefing up" their children's schedules. They had begun hiring independent researchers to look into the whole concept of children and television. CBS committed more than $600,000 to violence research studies, and NBC began a five-year study on the same subject. ABC started two similar projects and sponsored a workshop on children and television on June 23 and 24, 1971, in New York City.

The networks and their advertisers (at least those who subscribed) could always point to the code of the National Association of Broadcasters. For example, in the Toy Advertising Guidelines, issued in 1964, the NAB stated as guidelines:

> —Seek to place a toy in a framework of play environment, performing in a way which accurately represents the toy.
> —Employ action and encourage habits that are generally recognized standards of safety.
> —Avoid dramatization of a toy in a realistic war atmosphere.
> —Avoid dramatization that could frighten or scare children.
> —Avoid appeals contending that, if a child has a toy, he betters his peers or, lacking it, will invite their contempt or ridicule.
> —Avoid presumption that a toy requiring a material investment can be had for the asking.

In addition, the NAB code said about children's broadcasting:

> The education of children involves giving them a sense of the world at large. It is not enough that only those programs which are intended for viewing by children shall be suitable to the young and immature. In addition, those programs which might be reasonably expected to hold the attention of children . . . should be presented with due regard for their effect on children.

Of course, this code, like others, is not strictly binding, and stations could always resign from the NAB code (as Group W, Westinghouse Broadcasting did). Mrs. Charren said in an interview in May, 1971, that ACT would welcome voluntary codes if they worked: "Theoretically, this could have happened any time in the last 25 years. But it hasn't."[23]

ACT Goes to the FTC

In November of 1971, ACT made its first attempt at dealing with the Federal Trade Commission, asking for a ban of all drug and vitamin commercials directed at children on television. Mrs. Sarson appeared before the FTC's hearings on the matter, carrying a statement by Dr. Frederick H. Lovejoy, executive secretary of the Boston Poison Information Center, which said that vitamin pills are the second most commonly ingested poison by children under five.

Too many vitamins, said Dr. Lovejoy (*Christian Science Monitor*, 11-10-71), can be dangerous, and children older than one year don't really need them anyway since properly selected foods provide enough of them.

Mrs. Sarson also included a statement from the director of Duke University's Poison Control Center, Dr. Jay Arena, who warned (*Christian Science Monitor*, 11-10-71) that "vitamin pills and other medicines should never be advertised to small children." The two poison centers indicated that about 4,000 cases of vitamin poison were reported each year, with symptoms from diarrhea to shock.

ACT's petition asked the FTC to file charges of false and misleading advertising against Miles Laboratories (maker of Bugs Bunny, Flintstones and Chocks vitamins), Bristol-Myers (maker of Pals vitamins) and Sauter Laboratories (maker of Zestabs vitamins). ACT also asked that the three networks and their Boston affiliates be indicted.

The petition noted that these three drug companies manufacture chocolate-coated vitamins with iron in the form of chocolate chip cookies and that children associate the medicine with candy and cookies. The companies also were cited for advertising the pills as a means for making friends by becoming a member of a "club" of children who take vitamins.[24]

Miles Laboratory, one of the companies involved, said (Washington *Post* 5-29-72) its vitamin products are not strong medicines or drugs, but merely nutritional foods. Many children's diets, it said, lack enough vitamins and nutritionists supported the use of the company's vitamin supplements. "The implication by ACT that the vitamins are poisons and constitute a health hazard to children is grossly misleading and does a disservice to the nutritional well-being of the American public," Miles Laboratory said.

In an editorial entitled, "Cop-out," *Broadcasting* magazine said:

> In its petition ACT accuses television of causing children to take unsupervised doses of vitamins—the principal object of its complaint. The connection is never proved; it is merely asserted. Nor is there any showing that an elimination of drug advertising would reduce the incidence of drug ingestion by the very young. The most conspicuous omission in the complaint is any reference to parental obligations to keep drugs out of children's reach.[25]

Transcripts of the commercials were submitted to the FTC. Although most of them were broadcast nationally, ACT was careful in its complaints to specify only the Boston stations that it had monitored.

Mrs. Sarson's group did not wait for the FTC to ban drug and vitamin commercials before making new demands. This time ACT filed (St. Louis *Post-Dispatch*, 12-16-71) a petition with the FTC urging a ban on toy ads in children's programing, saying the ads were misleading and took advantage of children.

Children do not have the maturity or the experience to analyze what is called the "normal puffery" claims of commercials, ACT said. Moreover, children have little money and cannot buy most of the toys which are advertised. This means they pressure their parents into buying or refusing to buy, and this often creates a strain on the parent-child relationship, ACT said.[26]

At the time of the petition to ban toy advertising, ACT also announced it would submit a request to the FTC in January of 1972 that food advertisements be banned during children's programs. As reported in *Broadcasting* magazine, ACT said:

> In the past few years the amount of TV advertising directed to children has increased. Earlier, ads for children were for child-oriented products such as toys and cereal. Today vitamin pills, frozen dinners, bread, gasoline, shoes and snack foods are all being advertised directly to children with the clear implication that they should pressure their parents into buying the adult oriented products.[27]

As ACT had promised, in January it filed its formal request with the FTC to ban food ads on children's TV. The request contained a summary report of a study done by F. Earle Barcus, professor of communications research at Boston University. Barcus had monitored children's television programs during the last half of 1971 and found that commercials on Saturday morning had increased during that period. On the average, commercials interrupted the programing every 2.1 minutes at the end of 1971, compared with every 2.8 minutes six months perviously.

ACT Gets Some Results

In spite of the inaction of the FCC and of the FTC, ACT began to see some results of its campaign that were more than just words. On July 12, 1972, *Variety* reported that the Association of National Advertisers (ANA) had issued a new set of guidelines for children's advertising on TV, due to mounting public pressure, "mostly from Action On (sic) Children's Television," and from the FTC and the FCC. At a press conference on July 6, General Foods marketing vice president F. Kent Mitchel, head of the ANA, said the new guidelines are not "rigid and inflexible rules," but "principles." The four principles listed in the guide are that advertisers

1) should be aware of the limited ability of children to ferret out the truth of advertising and to take that responsibility on themselves,
2) should recognize children's belief in fantasy and not to use that to get them to expect "unreasonable performance,"
3) should take special care that truth and taste be used in commercials and,
4) should create advertising which would help "develop social standards which are generally regarded as positive and beneficial."[28]

The ANA also spelled out rules which advertisers should never violate:

> —not leading a child to think that owning a product will make him better than his fellows,
> —not undermining the child's belief in his parents, or of others in a position to guide him,
> —avoiding ads which take advantage of the child's inability to separate reality from fantasy,
> —barring program personalities or characters from selling products in or adjacent to his appearance,
> —not asking kids to pressure parents to buy,
> —staying within the bounds of literal truth in ad claims.[29]

The two members most responsible for drawing up the ANA guidelines were Jerry Denko of General Mills and Jerry Souers of Mattel, Inc. The latter company is a toy manufacturer and responsible for "Romper Room." No longer would the hostess on "Romper Room" advertise products, and the company agreed to "cut down on" plugs that were not clearly marked as ads.

ACT was not impressed with ANA's action. A group statement called the guidelines "filled with rhetoric which does not protect our children, but rather protects the advertisers and broadcasters."[30]

But within the month, ACT received some letters that pleased the group very much. The New York *Times* announced that three major drug companies—Miles Laboratories, Bristol-Myers and Hoffmann-LaRoche (Sauter Labs)—had separately informed ACT that they would discontinue vitamin advertising on children's television programs.

Robert Wallace, vice president for consumer products of Miles Laboratories, said (New York *Times*, 7-21-72) in a letter to ACT:

> We have become increasingly convinced that continued advertising of our children's vitamin supplement products in the present type of environment of children's television programs has become no longer in our interest; this relates especially to some of the highly questionable programing as well as the number and nature of commercials presently being aired in the Saturday morning time period.

ACT announced (Providence *Journal*, 7-21-72) that it would follow up "this victory" with an appeal to the regulatory agencies "to set rules immediately to eliminate all advertising on children's TV programs." Mrs. Charren said that the drug companies withdrew the vitamin advertising voluntarily and that "certainly, there was no question of coercion."

There was no immediate indication how dropping the ads would affect the sale of the children's vitamins. "Nobody seems worried," said Robert Kaufman, a spokesman for Bristol-Myers.

On January 4, 1973, an ACT study was released (New York *Times*, 1-5-73) that said all commercials from children's programing could be eliminated over a five-to-seven-year period without "cataclysmic" financial results. The study that was undertaken for ACT by Dr. William H. Melody, of the University of Pennsylvania's Annenberg School of Communications, said the networks could replace commercial sponsorship of children's programs with government funding, institutional advertising and private underwriting.

The study, which was to become a part of ACT's petition to the FCC to ban all commercials from TV programing for children, contradicted the Commission's own report released the previous spring by Dr. Alan Pearce, an official of the agency. The Pearce study, Melody said, reached its conclusion without considering possible changes in the existing broadcast structure for children's programing:

> When it is recognized that institutional change does not have to take place instantaneously with cataclysmic economic consequences, it becomes clear that policy makers can phase in the new policy at whatever rate they find most compatible with the public interest.

The Melody plan would have the FCC supervise the restructuring of children's programing practices, which would begin by requiring each network to carry one hour a week of children's programing without commercials, as would all local stations. Melody said he thought this would cost the networks and stations "about $2 million the first year." Eventually, money would be obtained for children's programing from industry, the government and institutions and would be channeled to production units free of network control. The networks would distribute and transmit the programs, while individual stations would contribute the free air-time. The five-to-seven year plan would avert the sudden serious loss of income broadcasters met when cigarette advertising was banned. Depending on the availability of outside financing, Melody said, the objective could be obtained in four years or could be stretched to 10 years.

A spokesman for NBC said (New York *Times*, 1-5-73) "Dr. Melody's view is simply a surmise on his part and one with which we disagree." A CBS spokesman said, "We disagree with Dr. Melody's general concept, but prefer to defer further comment until we have examined his full study."

Advertisers also reacted to the Melody plan. James Neal Harvey, president of James Neal Harvey, Inc., Advertising, wrote (New York *Times*, 1-14-73) that in all the years of controversy over advertising on children's television, "there has not been one shred of evidence produced that suggests exposure to television commercials is in any way harmful to children."

On the contrary, wrote Harvey, studies conducted by "highly respectable companies" like Milton Bradley, General Mills and Ideal Toy, have indicated that "children are a lot smarter about television advertising than many people apparently think." Children, even at preschool ages, know that a commercial is a commercial and that its purpose is to try to sell a product, Harvey said. Children, by and large, like TV commercials and they are not fooled by them. Harvey quoted a Roper survey taken in 1972 that said that 78 percent of the parents polled thought it was all right to have commercials on children's television.

Harvey wrote that ACT's motives go a lot deeper than "the ambition to replace Bugs Bunny with Beethoven":

> I believe it is that a lot of people in this country think that there is something fundamentally wrong with trying to offer a product for sale to a child, and that functions of our free enterprise system of producing, promoting and selling goods at a profit are rather immoral facts of life from which children should be shielded.

Harvey's article brought a number of protesting letters to The New York *Times*, including a letter signed by Peggy Charren and Evelyn Sarson. A doctor from Scarsdale, New York, Bernard L. Albert, wrote (New York *Times*, 1-28-73):

> Because of their personal experience in discovering that advertising on TV does in fact, exaggerate, misrepresent and overglamorize the products, my children do not trust TV advertising and are wary of any product so advertised. The efforts of advertisers to "hard-sell" to children is producing a generation that will mistrust all advertising.

Another writer, Sam Lanfranco, assistant professor of economics at McMaster University in Hamilton, Ontario, took objection to Harvey's intimation that opponents of children's advertising were against the free enterprise system. The letter concluded:

> Adam Smith was never a defender of institutions which pitted child against parent and one need not be engaged in a dark plot to overthrow American free enterprise to suggest that the existence of children's advertising on television raises a legitimate ethical issue.

Another letter-writer, Claire Barrett, of Concord, Massachusetts, noted that time devoted to advertising during children's programing was greater than during adult viewing hours. Wrote Miss Barrett, "Either children are exploited by advertising, or they are indeed as sophisticated as Mr. Harvey says and the industry is wasting its money. Mr. Harvey can't have it both ways."

But there were some signs that the industry was not just wasting its money and was beginning to "advertise" in different ways. ACT, usually the critic of the advertisers, began giving praise. In February, 1973, ACT gave "special commendation" to Sears, Roebuck Foundation, Xerox Corporation, Mobil Oil Corporation, General Foods, Quaker Oats Company and IBM for underwriting the cost of children's fare on public TV without commercials.[32]

ACT also praised Miles Laboratories, Sauter Labs' division Hoffmann-LaRoche and Bristol-Myers for pulling their vitamin advertising out of children's programing and moving it to grown-up TV periods. Praise also went to the companies that were underwriting new children's programs such as "Sesame Street," "Electric Company" and "Misterrogers Neighborhood." ACT cited 43 commercial stations that were broadcasting "Sesame Street" regularly without any commercials, and mentioned specific programs that each of the networks were now producing for children. Also, praise went to "The Waltons," the National Geographic Society specials and Jacques Cousteau's undersea explorations, with ACT's accompanying note that all of these shows had high ratings, a fact that negated claims previously made by broadcasters that the top quality family programs were difficult to sell to audiences.

But ACT's comments were not limited to words of praise. "Brickbats" went to the networks for scheduling some children's specials when young ones are ready for bed, and for continuing adult soap operas when many youngsters are home from school. A special "disservice citation" went to stations which carry adult reminders during the Saturday morning children's hour. ACT said that on a recent Saturday morning, public service spots told New York children that the Social Security office could give them protection, that the Army needed young men, that the National Alliance of Businessmen wanted to get all men working, and that dogs and cats should be spayed.

ACT had other awards:

- a marshmallow to the NAB Code Authority "for being too squishy to enforce any of the beautifully worded regulations it keeps passing."
- two marshmallows to the National Advertising Review Board for doing so little that former Governor Leroy Collins resigned from the group.
- Three marshmallows to the Association of National Advertisers for "carefully designing some guidelines on advertising that won't affect a single commercial on the air."
- a leaky gas tank to Arco and Shell for advertising to children by means of toy premiums, "proving conclusively that you can sell gasoline to someone without a car."
- one year's dental bills to all makers of candy and snacks advertised to children on television.

Later in the year, ACT initiated (New York *Times*, 7-22-73) its first annual ACT Bent Antenna Awards. Most of the "awards" made the same points as listed above: for example, a Mickey Mouse Watch to the networks for running children's specials in the evenings and adult programs in the afternoons. But there were a few new ones: for example, a carton of throat lozenges to all those noble individuals who sat and laughed so that animated cartoons on Saturdays could have hysterical laugh-tracks during explosions and conflicts.

In early October, 1973, ACT enjoyed the success of the KTTV agreement in Los Angeles that banned a number of children's programs that ACT and several other organizations had considered "violent." "That's going a bit too far," Gene P. Mater, vice president of CBS' broadcast group, said. "What Peggy and her friends are trying to do is restructure the whole bloody industry."

As the years went on, ACT's annual symposium on children's television became more and more prestigious. *Broadcasting* magazine (which began its report by reminding its readers that "in some circles" Mrs. Charren has the nickname, "Wicked Witch of the East") reported that at the March 31, 1974, meeting in Washington, D.C., ACT attracted some 1,200 broadcasters, producers, educators and parents, as well as "government watchdogs, including FCC Chairman Richard E. Wiley."[33] ACT came with a collage of children's television programs from around the world, hoping to prove "there is some TV worth watching."

But, as usual, critics of children's television were in attendance. Jona Gussow, a nutrition educator at Columbia University Teachers College, demanded that consumer advertising messages must do nothing less than teach "how not to consumer anything unless absolutely necessary." Consumer education will necessarily offend some, she said, including "most sponsors."

Ralph Nader was also there. He congratulated ACT for its efforts in children's television and said ACT served as a "prototype," illustrative of how people "without any power" have created a movement that is "rising, soaring." The greatest force behind government is people, Nader said, and then he advised ACT to sue the FCC for "nonaction" on its petition submitted in 1970 before the organization is renamed "Action for Grandchildren's Television."[34]

Broadcasting concluded its report:

> What began six years ago as a group of mothers concerned about children's viewing, packed the Kennedy Center last week for its panels and programing offerings. What's next? "Maybe the moon," Mrs. Charren said.

Mrs. Charren had some reason to be optimistic. Since January of 1974, ACT and other groups (notably the Council on Children, Media and Merchandising, represented by founder and chairman Robert B. Choate) had been able to present their case at a succession of Congressional hearings in Washington. Also, ACT noted (New York *Times*, 5-12-74) that West Germany had moved to curb hard-sell advertising on children's television and the Canadian Government would begin banning all TV advertising to children on the state-owned Canadian Broadcasting Corporation beginning in January of 1975.

Choate testified before the Senate Commerce Committee that in motivational research houses across the country, children were being used in laboratory situations to formulate, analyze, polish, compare and act in advertisements that were designed to make other children salesmen in the home.

But government agencies were still reluctant to make any rulings. FTC Chairman Lewis Engman said before the Commerce Committee that "our agency does have the prime responsibility to move with respect to the content, deceptiveness and unfairness of children's advertising."

Nevertheless, Engman said:

> I have some concern as to whether or not we in fact do have the jurisdictional authority to do such things as, say, regulate the numbers of commercials which may appear on a given program. That historically has been the function of the FCC.

And in related testimony, Richard Wiley, then newly appointed chairman of the FCC, said (New York *Times*, 5-12-74):

> Let me say that I consider this a very important issue. These people, children, are not just little consumers, they are one of (the nation's) greatest resources. But I think we have to be very careful about the areas in which the FCC can and should move.

Mrs. Charren responded to the testimony of the two chairman by saying that "action and responsibility for the issues posed by children's television will be relegated to an unfathomable abyss somewhere between the two regulatory agencies."

The agencies and the industry again seemed to think that the real answer was in self-regulation. But Choate, who expressed concern that his four children were cynical, disenchanted with private enterprise perhaps due to being tricked or lied to by TV commercials, said that pinning hopes for significant reform on the industry's willingness to regulate itself is "like sending the goat out to mind the garbage."

Meanwhile, the FCC's Alan Pearce continued to look into the feasibility of non-commercial children's television and in June, 1974, released a study that confirmed many of the findings of Dr. William H. Melody. Pearce said the networks would lose little advertising revenue from children's shows if it simply cut back the number of advertising minutes per show and raised the cost of the time slots. After all, there were so few advertisers competing for the advertising slots during children's show times (Kellogg, Mattel and General Mills alone accounted for 30 percent of the revenues).

Pearce said a 25 per cent reduction in commercial content would reduce CBS's revenue by \$6.3 million, but CBS would still net a \$10 million profit from children's television programs. The same 25 per cent cut would reduce NBC's profits from \$3.7 million to \$1 million, and ABC's from \$7.2 to 3.5 million. Pearce concluded that commercials could be reduced to 7½ minutes from the current average of 9 to 10 minutes per hour on Saturday mornings, and 12 to 16 minutes per hour on weekdays.[35]

The FCC had debated for a long time whether broadcasters could afford to improve children's programing while simultaneously reducing the number of commercial minutes per program. Pearce had provided some answers. In May, 1974, in a speech in Atlanta, Chairman Wiley had warned that the Commission would adopt its own remedies for the problems it saw in children's programing and advertising unless the broadcasters acted voluntarily to deal with those problems.[36]

A month later the National Association of Broadcasters began to act. It ratified recommendations of its code review board restricting both advertising time and content of children's programing. Advertising was to be reduced to 10 minutes per hour in 1975 and to 9½ minutes in 1976. On weekday programing, nonprogram time was limited to 14 minutes per hour in 1975 and to 12 minutes in 1976.[37] The board also approved provisions requiring that program and advertising content be separated by an "appropriate device."

Three weeks later, the Association of Independent Television Stations (INTV) adopted similar guidelines.

And, finally, on October 24, 1974, after more than four years of testimony and debate, the FCC adopted a policy statement regarding children's television programs that would set levels of advertising in accordance with the limits established by the NAB and the INTV.

Other points made in the policy statement called on broadcasters to:

—provide a "reasonable amount" of programing for children—a "significant portion" of it educational in nature."
—meet the "special needs" of pre-school children.
—air children-oriented programing throughout the week, and not only on weekends.
—avoid "host selling" and "other techniques that confuse the distinction between programing and advertising content."
—provide for "clear separation" between programing and advertising.[38]

The Commission did not define either "reasonable" or "significant." Mrs. Charren found the Commission's statement "disappointing and disturbing."[39]

But ACT did not quit. Later in November, it announced (Los Angeles *Times*, 11-18-74) the marketing of a new game called "Switch," to be sold for \$1.50, "to let families know there's something else to life than television."

The game starts with an imaginary TV set switched "on," but after a player makes 56 moves, fewer if luck prevails, victory is won and the set is switched "off." The game has 10 draw cards that let the players make one to 30 commercials, one technical difficulty, one station break and 19 shows with names like "The Braided Bunch" and "Tarred Wreks." En route, players get five "switch" alternatives, such as one switch to public TV or a switch "from buying a toy to making one." The players pick their commercials from a stack of commercial cards for such imaginary goodies as "Glop Top," a soft drink, or "Capri-Cavity Granules." They have to get rid of the cards to move to new positions.

The game was to be sold only by ACT, not in stores, and first-round printing was for 20,000 "Switch" sheets. Mrs. Charren said ACT would not make any money on the game, and would lose even if it would sell them all. "But we felt the important thing about the game was its educational aspect. We're not using this as a fund-raiser."

ACT did not merely accept the FCC policy statement.

According to the December 2, 1974, edition of *Broadcasting* magazine, "the little band of Boston mothers who first aroused the FCC's interest in the subject, has filed notice of its intention to appeal the FCC's policy statement."

The editorial entitled "Not Again" warned that the "courts could agree with ACT and remand the case for the harsher actions that ACT originally petitioned the FCC to take." The editorial again urged "the healthy answer" of "individual responsibility."[46]

ACT In 1975

In 1975, ACT announced it had received a grant of $165,000 from the Carnegie Corporation of New York. The grant was to be used for the development of local chapters and for a national fund-raising campaign. ACT had come a long way from its first year when, operating out of Mrs. Charren's home, the officers collectively contributed $3,000 toward expenses. In 1970, ACT received a $6,000 grant, and in 1971 received $164,000, which enabled it to rent office space and become self-supporting. In May, 1974, ACT received (*Wall Street Journal*, 8-5-74) two grants, one from the Ford Foundation totaling $300,000 over two years, which enabled Mrs. Charren to begin drawing a $12,000 salary. Grants had come from the John and Mary R. Markle Foundation, the Consumers Union, the Center for Understanding Media, and the National Citizens Committee for Broadcasting.

But the Carnegie grant was intended (New York *Times*, 3-5-75) to help the group become self-sufficient through the development of "an active national membership." Mrs. Charren said the money would be used to involve thousands of others in media reform at the local level.

Mrs. Charren said (*Christian Science Monitor*, 3-7-75) local chapters were already at work. An organization at the University of Mississippi had succeeded in placing an educational program, "FunShop," on WTWV-TV in Tupelo, Mississippi, once a month, without commericals. The program, designed for children from three to eight years old, was deemed important by the local group because Mississippi has no kindergarten program.

Another ACT associate, Julie Quincy Jones, of Buffalo, New York, president of Consumer Forum, Inc., and her co-workers stopped a nutritionally deficient cereal from being marketed in western New York by General Mills. Mollie Miller of Pittsburgh, with her 10 active ACT members, saw to it that public service nutrition announcements became a regular part of local programing, as well as spots advising on the wise use of TV by child viewers themselves. Amanda Wallner of Lansing, Michigan, and her group threatened a petition to deny WJIM's license and thereafter the CBS affiliate met and consulted regularly with parents.

In addition to establishing local chapters, ACT continued its other activities. On April Fool's Day, 1975, ACT again issued its "Bent Antenna" awards, this time to nine "professionals in the broadcasting field who have assigned a higher priority to their own interests than to children's needs."[47] A few examples:

—A sugar 'lobby-pop' to the FTC for pretending it doesn't know whether sugar causes cavities, to avoid action on ACT's three-year-old petition to eliminate the selling of highly sugared foods on children's television.

—The 'Waterpik" award to M&M Mars for pushing candy to kids and creating service announcements for children "blaming cavities on plague."

—The self-serving citation of the year to the NAB Code Authority for deciding kids are less vulnerable during the week than on weekends, and cutting back commercial time on the latter, but not the former

—A fire extinguisher to WGN-TV, Chicago, for showing a movie promo with a man being burned at the stake during the kiddie program, "Bozo's Circus."

A couple of weeks after the awards, the FTC announced (Louisville *Courier-Journal*, 4-12-75) it would not ban advertising for food from children's television. Instead, the FTC said it would continue to issue rules on ad techniques that are unfair or deceptive regardless of the product and would continue to police deceptive ads on a case-by-case basis. FTC Chairman Lewis Engman and Commission member Elizabeth Hanford partly dissented, saying they would have opened a rule-making proceeding about the fairness of advertising sugar-laden foods on children's television.

But in June, 1975, the NAB met (Washington *Star*, 6-3-75) at the Washington Hilton to examine "the emerging FTC and FCC regulations concerning children's television, and to find out what kind of shows local communities are doing." ACT was not invited, but it was "generally conceded" that ACT, consumer advocate Robert Choate and other consumer groups concerned with children's television and advertising were the compelling reason for the conference. Director of consumer protection for the FTC, J. Thomas Rosch, noted that the National Science Foundation had received a $100,000 grant to conduct the first of a three-part research project on the impact of commercials on children's television. Generally, FCC and FTC officials praised the industry for its voluntary self-regulation.

At one panel, Mrs. Charren asked Jerome Lasner, assistant director of NAB's Code Authority, whether he was including sugar in products dangerous to health. "'No,' answered Rosch succinctly, to a round of laughter." A toy representative, speaking with Lasner after the panel, said (Washington *Star*, 6-3-75) said, "Those ACT girls. I hate them with a purple passion."

In November, ACT was in Atlanta for its fifth annual conference. According to reports by Judy Flander (Washington *Star*, 11-5-75), little was accomplished except three days of griping.

Senator Frank Moss told the convention:

> ACT represents the most significant grass roots effort at consumer protection that exists today . . . ACT was born out of the dawning of the insight that the great promise of television has been perverted into mind-rotting commercial exploitation of our nation's children.

Another speaker was Dr. Stephen P. Strickland, co-author with Douglass Cater, of "Television Violence and the Child." Strickland said some important people in the industry still thought of ACT merely as "the ladies from Boston," and one network president not long ago referred to ACT and its leaders as "the enemy." Strickland continued:

> I'm simply suggesting that ACT is neither—that it is more than a group of ladies and less than the enemy. . . I predict that ACT will be around at least as long as the current hierarchy of the television industry and longer than present members of the Federal Communications Commission.

As 1975 went into its final month, ACT was indeed still around. On December 15, Mrs. Charren announced at a New York City press conference that two studies of children's programing, which had been commissioned by ACT, had been completed by Dr. F. Earle Barcus of the Boston University School of Public Communications: "Weekend Commercial Children's Television," and "Television in the After-school Hours." The studies showed that commercial messages interrupt programs directed to the under-12 audience "on an average of once every 2.9 minutes," and "almost half of all commercial announcements were for cereals, candies and sweets."[42]

Mrs. Charren said the studies "negate the argument of the FCC's Policy Statement on Children's Television that self-regulation is an adequate solution to the problem of children's TV."

Dr. Barbus also stressed that while network children's programs had reduced "obvious portrayals of violence," his study of independent stations found that "nearly two-thirds of independent programs contained some form of violence and three in 10 were judged to be 'saturated' in violence."[43] *Broadcasting* magazine reported that some of the stations' logs differed from the findings of Dr. Barcus.

As the year ended, ACT had not won all of its battles by any means, but it had made its work felt. With a staff of six full-time and eight part-time employees and more than 5,000 dues-paying members, ACT was not about to fold up its tent and disappear.

FOOTNOTES

1. Leonard Gross, "Television Under Pressure: Are a Handful of Activists Saving or Wrecking the Medium?" *TV Guide*, February 22, 1975, p. 5.
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4. Gross, "Television Under Pressure," p. 5
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8. FCC Report No. 9621, January 21, 1971.
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10. "The Broadcasters' Say on ACT's Proposals," *Broadcasting*, July 5, 1971, p. 8.
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19. "ACT Sets Off on Different Tack," *Broadcasting*, March 1, 1971, p. 34.
20. "ACT's May Day Kidvid Tuneout," *Variety*, April 14, 1971
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31. "ACT Study Offers Plan to Delete Commercials from Children's Shows," *Broadcasting*, January 8, 1973, p. 22.
32. "ACT Limns, Boos Kids' TV Advertisers," *Advertising Age*, February 26, 1973, p. 135.
33. "ACT Takes Its Show to Washington," *Broadcasting*, April 8, 1974, p. 22.
34. *Ibid.*, p. 24.
35. Alan Pearce, "The Economics of Children's Television," FCC, June, 1974.
36. "Wiley Says FCC's Coming Close to Action on Children's Advertising, Programing; He Lays Blame on Broadcasters for Inertia," *Broadcasting*, May 27, 1974.
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39. "The Doan Report," *TV Guide*, November 9, 1974, p. A-3.
40. "Not Again," Editorial, *Broadcasting*, December 2, 1974, p. 58.
41. "ACT Bent Antenna Awards Rap TV Ads, Action," *Advertising Age*, April 7, 1975, p. 56.
42. ACT Press release, December 15, 1975.
43. "ACT Says Stations Aren't Living Up to Rules on Ads in Children's TV; Stations Say Group is Way Off Base," *Broadcasting*, December 22, 1975, p. 29.

Additional copies of this Freedom of Information Center report may be obtained by writing the Center at Box 858, Columbia, Missouri 65201. There is a 50 cent charge for each additional copy, 45 cents each for 25 or more copies, $30 per hundred copies, and $25 per hundred on orders of 300 or more copies.

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ABSTRACT

The origins, development, and effectiveness of Action for Children's Television (ACT) are examined in this pamphlet. The strategies used by ACT to obtain change at the congressional level and within television stations and networks include the following: a "tuneout" day when people are urged to turn off their television sets, a boycott of certain advertised goods, the "Bent Antenna" award for the poorest taste in children's television programing, and lobbying and the consolidation of public pressure. Special attention is given to ACT's successful attempt to alter government agency standards for the advertising of certain food items and toys during children's prime television-watching times. (KS)

SCHOOL OF JOURNALISM, UNIVERSITY OF MISSOURI AT COLUMBIA
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FREEDOM OF INFORMATION REPORT NO. 364

ACTION FOR CHILDREN'S TELEVISION

This report was written by Donald P. Raaly, Associate Professor at the University of Missouri School of Journalism, as part of his doctoral dissertation, The Challengers: Social Pressures on the Press 1965-1975.

Introduction

Some of the many pressure groups concerned with the media that arose out of the sixties died quietly in the early seventies—some even before the seventies. But some of them have been unusually successful in what they set out to do. And if they have not been successful, they have at least been persistent.

Action for Children's Television deserves detailed treatment because it is an example of middle-class activism working within the system, using many of the techniques and approaches employed by what some would call more "radical" groups. Almost from the beginning, ACT knew how to use the news media to publicize what it was doing. Second, it came to know the law and the governmental agencies and how to "get to" them. Third, it used tactics designed to gain attention: a "tuneout," a day when people were urged to turn off their television sets; a boycott of certain advertised goods; annual "rallies"; the "Bent Antenna" awards for the poorest taste in children's television; a game called "Switch," which was to teach children and their parents how to enjoy turning off their television sets.

Most of all, ACT deserves attention because the group is larger, better organized and financed, and probably more determined than ever to add to the improvements it thinks it has made in programing for the young viewing audience.

Origins

"Like many groups, ACT began unpretentiously, and for various reasons, broadcasters first experienced some difficulty in taking the group seriously.

As Leonard Gross wrote in *TV Guide*, the origins of ACT "are like a democratic dream."[1] After all, Gross said, in a democracy, when someone is disturbed by something in society, he or she should be able to do something about it.

In this case, the perturbed person was Peggy Charren, "a nonworking-working housewife" in her middle 30's, who lived in Newton, Massachusetts, a suburb of Boston with her husband, a plastics manufacturer, and their two daughters. Mrs. Charren had worked in commercial television in New York. She had also owned and operated a print gallery in Providence, Rhode Island, started a company that organized children's book fairs in Boston and served as chairman of the Newton Creative Arts Council.

One day while Mrs. Charren was watching her 3-year-old absorbed in front of a TV set, she decided television programing for children could be improved. More specifically, she came to believe that in the eight years since her older daughter had watched the same kinds of programs, the incidence of violence had significantly increased.

One day when she noticed that a "very violent movie" had been aired during Christmas vacation, she called a local station to ask why it had been scheduled at a time when children were very likely to be at home watching. A station official replied that the movie had been selected precisely because children would be at home watching at that time. "That they didn't even think to question it indicated that not enough people were paying attention," Mrs. Charren said, (*Wall Street Journal*, 8-5-74).

Mrs. Charren spoke to some of her friends about her concerns, and finally got a group of them together to discuss the subject. "We asked ourselves the kinds of questions a group of citizens should ask when they decide to change something in the system that isn't working right."[2] Fifteen friends, neighbors, teachers and pediatricians were at that first meeting, all concerned, but with little knowledge of how to proceed. "All we had were gut reactions," Mrs. Charren said, (*Wall Journal*, 8-5-74). "And there's no better way to make people pay no attention to you than to speak from no knowledge."

But four people whom Mrs. Charren contacted also wanted to change something in the system badly enough to begin doing something about it. They had at least one thing in common—they were all mothers.

Mrs. Evelyn Sarson, a native of England, formerly employed by the Reuters News Agency in Paris and the *Guardian* in Manchester, England, wife of a producer, also British, for public TV's WGBH in Boston, mother of two, served as the first president of the group.

Summary:

The author provides detailed information on the origins and development of ACT—one of the most successful citizen pressure groups to emerge from the sixties. This is the second paper published by the Freedom of Information Center on this group. The earlier report, "Action for Children's Television (ACT)," No. 265, by Melinda Elledge, was published in August, 1971.

Additional copies: 25c each.

Mrs. Judith Chalfen, graduate of Smith College, previously employed in both commercial and educational television, founder of Everyman's Theatre, the first "experimental" theater group in the Boston area, wife of a building contractor, mother of three, served as treasurer.

Mrs. Joann Spiro, graduate of fine arts from Boston University, free lance designer, wife of a supplier of architectural and graphic materials, mother of two, served as a research assistant.

Mrs. Lillian Ambrosino, graduate of Cornell University (B.A.) and of Harvard University (M.Ed.), former producer of educational radio programs, newspaper reporter, teacher and communications researcher, wife of an employee of Boston's public television station, mother of three, served as an executive committee member.

The women did receive help. Mrs. Sarson wrote in early 1971 that four men were serving as advisers to ACT: Dr. Milton E. Akers, executive director, Education of Young Children, Washington, D.C.; Dr. Richard Galdston, chief, in-patient psychiatric consultant service, Children's Hospital Medical Center, Boston; Dr. Hyman H. Goldin, associate professor of communications, Boston University School of Public Communications; Richard Lewis, poet and editor, director of Touchstone Center for Children, New York.[3]

The group first became involved in a local issue. WHDH-TV in Boston had expanded its CBS morning news and reduced "Captain Kangaroo" from an hour to a one-half hour broadcast. The group demanded, through a letter-writing campaign and pickets, that the Captain regain his full hour. Their first battle ended in victory, and the group had received the encouragement to continue its crusade for children's television.

For at least a year, beginning in 1968, they did their homework—reading the magazines of the broadcasting industry, monitoring televsion programs, talking to local broadcasters. After they thought they knew what they were talking about, they traveled to New York to speak with the network executives.

Recalling that visit to New York, Mrs. Charren said in *TV Guide*:

> We were looking for the answer to why television was like it was. It was the broadcasters who, in answering that question, established ACT's goals. What the broadcasters said was children's television is like it is because it exists only to meet the needs of the 2-to-11-year-old market. When you get a program format that's successful, you keep employing it because you want the largest part of the 2-to-11year-old market to see the commercial.[4]

What the New York executives were telling the "Boston mothers," as they soon came to be known, was that children in that age group had been identified as a separate, specific market and therefore, as an independent profit center that could be appealed to.

ACT Goes to Washington

Not long after the New York visit, Mrs. Sarson was testifying before the subcommittee on communications of the Senate Commerce Committee, saying that the FCC is unable to cope "with an industry that has expanded tremendously in two decades."

The subcommittee hearings concerned Senate Bill S 2004, which would amend the Communications Act to establish orderly procedures for the consideration of application for renewal of broadcast licenses. Mrs. Sarson opposed S. 2004, explaining that the FCC "does not have any definitive criteria by which to judge a station, other than the nebulous 'serving the public interest, convenience and necessity,'" adding: "The FCC has rarely found any broadcaster guilty of not meeting this requirement." What the FCC needed were "standards and guidelines" by which it could evaluate a station's performance. She then offered as examples ACT's proposed guidlines for children's television programing.

> Whereas: The interests of the public are best served when children are considered as a special audience and not as potential consumers.
>
> Therefore: The following rules should govern all programing for children:
>
> 1. There shall be no sponsorship and no commercials on children's programs.
>
> 2. No performer shall be permitted to use or mention products, services or stores by brand name during children's programs, nor shall such names be included in any way during children's programs.
>
> 3. Each station shall provide a minimum of 14 hours of programing per week for children as part of its public service requirement . . . Provisions shall be made for programing in each of the following areas within the times specified:
>
> A. Preschool: Ages 2 to 5: 7 a.m. to 6 p.m. daily; 7 a.m. to 6 p.m. weekends.
>
> B. Primary: Ages 6 to 9: 4 p.m. to 8 p.m. daily 8 a.m. to 8 p.m. weekends.
>
> C. Elementary: Ages 10 to 12: 5 p.m. to 9 p.m. daily: 9 a.m. to 9 p.m. weekends.
>
> These rules shall be enforced by the Federal Communications Commission. Infraction shall be grounds for revocation of license.

The next step for ACT was a logical and simple one. Evelyn Sarson sent the guidelines to the FCC. In her letter to the FCC on February 13, 1970, she wrote:

> We all know that television is important in the formulation of a pattern of values, attitudes and social philosophy that, once learned, can be difficult to change.
>
> The purpose of Action for Children's Television Inc. is to transform this powerful medium into a creative force. . . .

Mrs. Sarson also noted in the letter that ACT's guidelines for children's television were now a "part of the Congressional Record," thus making it difficult for the FCC to ignore.

Although the FCC had rarely ventured into the sensitive areas of content and program categories,[5] it gave public notice that it had accepted ACT's guidelines as a petition for issuance of a notice of proposed rule making and that it had assigned it file No. 1569. This meant that under the provisions of Section 1.405 of the Commission's rules "interested parties" could file statements through July 1, 1971, in support of or in opposition to the Commission's action.

The FCC's Joe Ryan, who wrote the notice of inquiry and proposed rule making, recalled in an interview: "We thought they were a group of little women from Massachusetts petitioning for their rights. Hell, they've got the best legal talent in this part of the country." By that time the group's attorney was Earl K. Moore, the communications lawyer who had long been active in helping groups deal with the FCC.[6]

The "little women from Massachusetts" received a lot of support. The FCC received 100,000 replies, a response without precedent, 90 percent of which favored ACT's proposals.[7]

Suddenly the group had to be taken seriously. As Bob MacKenzie of the Oakland *Tribune* wrote (3-31-70):

> When first proposed, that idea sounded excessively idealistic, if not downright un-American. No one had even suggested that television networks and stations, profit-making corporations that they are, ought to operate at a dead loss; even the public service programs required by the FCC guidelines are allowed to have sponsors, if they can find any.

According to The *Wall Street Journal* (10-22-70), ACT's proposal for no ads on children's TV would have cost the three major networks some $26.4 million annually in ads for games, toys and hobby craft products and another $57.1 million in revenues from breakfast cereal ads.

The FCC had split 4 to 3 in its decision to adopt the notice of inquiry and proposed rule making,[8] but FCC Chairman Dean Burch began making his views known concerning programing for children, and he sounded sympathetic to ACT's views. In March of 1970 he was quoted in The New York *Times* as saying (4-9-70), "It is, I believe, fair to ask whether broadcasters operating on public channels as public trustees have fully met their responsibility to children."

In September, 1970, speaking to the International Radio and Television Society in New York, Chairman Burch mentioned ACT's proposals and said: "Problems must be considered, weighed and solved, and the solution must often be implemented regardless of whether cereal or toy sales reach new heights—or not."

Support for ACT's Proposals

Chairman Burch had good reason to be concerned. Few could have predicted so much discontent with children's television. The FCC quickly accumulated 15 volumes of public sentiment.

Perhaps the biggest complaint voiced by parents involved the appeals made to their children to buy expensive "TV toys," which the parents could not afford. Another major concern of those who wrote involved advertisements for children's vitamins or vitamin supplements. The individual program that perhaps received the most attacks was a series called the "Romper Room," on which, said the parents, the teacher reminded her young audience that only children with "real Romper Room toys" can fully participate in the "class" activities.

ACT's proposal to forbid performers from doing the advertising themselves was met with wide approval. Jeff R. Spalsburg, director of audio-visual services, Instructional Systems, Inc., wrote to Chairman Burch:

> I do not believe that the strong impact these performers have on children can be understated, overlooked or ignored. Children accept these people not only as friends of the family, but in some cases, as second parents."

Some parents were worried about the effects of television commercials in general. Some were opposed to the sheer number of commercials on children's television, pointing out that the National Association of Broadcaster's Code of Good Practices permits 16 minutes of commercials per program hour on children's programs, compared to eight during prime-time adult shows.

The Stations and the Networks React

Obviously, not everyone agreed with ACT's proposals, least of all the networks and individual station managers. The biggest concern, right from the beginning and up to the present has been, who is going to pay for the programing? CBS said that ACT and other organizations had decided that commercial television should assume a role in education made necessary by the "alleged failings of the multibillion-dollar educational system in the United States.

The National Association of Broadcasters' filing with the FCC was devoted principally to what it said was the value of self-regulation through the NAB code and to "significant improvements in programing and advertising content" that had occurred at both network and local levels.[10] The NAB warned that the criticism stimulated by ACT's proposals might obscure the improvements that have taken place.

A press release from the NAB dated October 1, 1971, discussed an official comment it had filed with the FCC, stating that the NAB

> firmly believed that the young public is best served by a system of television which is unafraid to innovate and experiment, which proceeds to improve its broadcaster matter through regulation which is voluntarily carried out, not government enforced as ACT, NCCB, and others are urging. These parties have painted a picture of American Television which is both unfair and inaccurate and cannot go unchallenged if any useful or honest resolution of the issues in the docket is to emerge.

The NAB listed what it considered to be inaccurate statements and untenable conclusions in the petitions of ACT, and insisted that:

> —Requiring stations to offer 14 hours of children's programing and to eliminate associated commercial matter would not produce uniformly excellent children's fare.
> —Taken to its logical conclusion what ACT and others are seeking is a government owned, financed and managed broadcast operation like those found in many other countries.
> —Television has not been insensitive to public preference when it comes to changing its programing offerings.
> —Elimination of commercial broadcasting would seriously diminish quality caliber programing.
> —Every other country which presents children's television on a non-commercial basis has come up with a substitute means of financial support—yet

the petitioners expect American broadcasting to present such programing at its own expense. "Such a proposal is unworkable, inequitable and without precedent."

One of the most significant points to be stressed about American television, NAB said, was that it is "totally self-sustaining and genuinely free to its public."

Then the NAB predicted that elimination of advertising from children's programs in the United States "would sound the death knell for quality children's program fare."

An editorial entitled, "Child's play," in *Broadcasting* magazine on January 25, 1971, said that the year before, five housewives from Boston were given an audience by the FCC "to advocate nothing less than total federal control over television programing aimed at children." The editorial then reviewed a couple of ACT's proposals "and, oh, half a dozen other propositions too outlandish to be taken seriously." The writer said he could not believe that the commissioners "had sat through the pitch with a straight face," and called the proposed rulemaking "the deepest federal incursion yet into broadcast programing."[11]

ACT Attacks Toy Commercials

After filing their proposals with the FCC, ACT directors mailed letters on February 23, 1970, to all members of Congress asking for support.

In October of 1970, ACT joined the Boston University School of Public Communication and the Kennedy Memorial Hospital for Children in sponsoring a national symposium on children and television in Boston for "hundreds of professionals from medicine, social work, education, TV, broadcasting and advertising."[12]

After the symposium, ACT announced it would zero in on "toy marketers for their hard-sell yuletide campaigns."[13] ACT said it would distribute a four-page newsletter ("Christmas Survival Kit") and collect signatures on petitions to be sent to Toy Manufacturers of America. The petitioners would ask that toy makers improve the quality of their products and cease aiming their commercials solely at children. The Christmas drive was to focus on schools, community groups and shopping centers in Boston, New York, Washington, San Francisco and Chicago.

ACT also asked (*Christian Science Monitor*, 12-14-70) most of the country's leading television stations to run spot ads advising viewers of deceptive advertising of toys. The Federal Trade Commission had prepared charges against three well known toy manufacturers. Only a dozen or so stations had replied and most indicated that they would await the FTC's formal complaint against the toy manufacturers before making a decision. But, said the editorial, the stations were beginning to look closely at those ads because they could foresee a battle similar to the one waged over cigarette ads.

Actually, the group had done more than ask "most of the major stations" to run spot ads advising viewers of deceptive advertising of toys. ACT had requested the FCC in a letter dated December 10, 1970, to issue a public notice advising all television licensees broadcasting toy commercials "that they would make substantial time available for presentation of the view that these commercials are misleading. . . ." ACT based its request on the fairness doctrine, saying "that it is not in the public interest for broadcasting stations to continue to present commercial announcements which have been identified by responsible public authorities as deceptive. . . ."[14]

The FCC refused (*Christian Science Monitor*, 11-10-71) to rule on ACT's complaint. But on December 22, 1970, the FTC issued a joint statement with the FCC that the two groups had met to discuss possible joint hearings on television advertising.[15]

The FCC Issues Its "Notice"

Then on January 20, 1971, the FCC issued its notice of inquiry and proposed rule making. The Commission cited objections that had been raised to ACT's proposal, but said there were "high public interest considerations involved in the use of television, perhaps the most powerful communications medium ever devised, in relation to a large and important segment of the audience, the nation's children."[16] The FCC also said it did not have information on children's programing to decide whether it was good as it was or whether it needed improvement.

FCC Commissioner Nicholas Johnson said he approved of the FCC request for additional information, but he was disturbed that so little had been done about the ACT petition:

> In reality, this (the Notice of Inquiry and Proposed Rule Making) is simply another case of "Due Processing them to death." It is Kafkaesque that after 10 months, after 15 volumes of comments, this commission has to tell concerned parents that ". . . we . . . have reached no conclusion, tentative or final, on the desirability of a rule. . . ." I believe that we should at the very least be ready by now to adopt specific proposals—those proposed by ACT or whatever our own ingenuity could devise—as a proposed rule making.[17]

To gain the information it said it needed, the FCC asked that stations submit a sample of programs for a "composite week": Sunday, September 13, 1970; Monday, February 16, 1970; Tuesday, June 23, 1970; Wednesday, April 8, 1970; Thursday, October 2, 1969. The Commission asked for the names, dates, time and lengths of such programs, along with descriptive summaries of them. It also asked whether the programs were entertainment or educational, original showings or reruns, who the sources and sponsors were, the products, stores or services advertised and the commercial time involved.

The president of ACT, Mrs. Sarson, said the Commission could get the material it wanted from reading the network program schedules and from watching television: "We could give the Commission a subscription to *TV Guide*. At least half of the questions they're asking are answered in it."[18]

In February, 1970, ACT moved again, this time with three other groups—the Council on Children, Media and Merchandising; the National Citizens Committee for Broadcasting; and the Office of Communication of the United Church of Christ—asking the FCC to require networks to make available at least one film or video tape of all programing and advertising during the "composite week." The Commission said ACT should go directly to the networks with its request, adding that it would reconsider the requests if the networks turned them down.

In March, ACT and the same three groups sent a letter to 120 television stations requesting that they broadcast a 30-second spot which said, in part:

> The Federal Communications Commission would like to know . . . what you would like to see on TV for children; what you feel about commercials aimed at children. In January the Commission published a notice of inquiry asking questions about kid's TV. Until May 3 (the original closing date—the time was extended several times, finally to October 1, 1971) they will accept replies from broadcasters, advertisers and the public.[19]

Also, to call attention to the original May 3 deadline, ACT initiated a "tuneout campaign" for May 1, asking that the nation's TV sets be turned off for the day.[20]

ACT's Influence Spreads

Two studies commissioned by ACT, "Programing and Advertising Practices in Television Directed to Children," by Ralph M. Jennings, and "Mother's Attitudes Toward Children's Television Programs and Commercials," by Daniel Yankelovich, Inc., appeared in 1970. The latter said that toys and games seen to be large and exciting on TV, often turn out to be "inferior." The misrepresentations, it said, lead to frustration, disappointment and tears. Often the child's anger is vented upon the parent, not the sponsor, thus making for a constant duel between children asking for things and mothers having to say yes or no.

Although they denied that ACT was the reason, all three networks designated special executives for children's programing.[21] NBC promoted public affairs director George Heinemann to vice president in charge of "children's program"; CBS hired Peabody Award winner Allen (Duke) Ducovny to oversee Saturday morning schedules, "Captain Kangaroo" and the "CBS Children's Hour"; ABC appointed Hollywood film director-producer Charles Martin Jones as first executive director of children's programing.

ACT was not impressed by the first "new season" under new management.

> Only three shows seem to have made any effort to break out of the eternal chase-and-fight routine: "Hot Dog" (NBC); "Tomfoolery" (NBC) and a series from Britain, "The Double-deckers" (ABC). The much publicized CBS "In The Know" segments which were described as four-minute news items turned out to be mainly commercials with a brief film insert lasting less than two minutes. Topics covered have included felling a tree, giant crabs, glass blowing and birds that fish. . . . They looked like old travelogue excerpts.[22]

The networks said they were doing more than "beefing up" their children's schedules. They had begun hiring independent researchers to look into the whole concept of children and television. CBS committed more than $600,000 to violence research studies, and NBC began a five-year study on the same subject. ABC started two similar projects and sponsored a workshop on children and television on June 23 and 24, 1971, in New York City.

The networks and their advertisers (at least those who subscribed) could always point to the code of the National Association of Broadcasters. For example, in the Toy Advertising Guidelines, issued in 1964, the NAB stated as guidelines:

—Seek to place a toy in a framework of play environment, performing in a way which accurately represents the toy.

—Employ action and encourage habits that are generally recognized standards of safety.

—Avoid dramatization of a toy in a realistic war atmosphere.

—Avoid dramatization that could frighten or scare children.

—Avoid appeals contending that, if a child has a toy, he betters his peers or, lacking it, will invite their contempt or ridicule.

—Avoid presumption that a toy requiring a material investment can be had for the asking.

In addition, the NAB code said about children's broadcasting:

> The education of children involves giving them a sense of the world at large. It is not enough that only those programs which are intended for viewing by children shall be suitable to the young and immature. In addition, those programs which might be reasonably expected to hold the attention of children . . . should be presented with due regard for their effect on children.

Of course, this code, like others, is not strictly binding, and stations could always resign from the NAB code (as Group W, Westinghouse Broadcasting did). Mrs. Charren said in an interview in May, 1971, that ACT would welcome voluntary codes if they worked: "Theoretically, this could have happened any time in the last 25 years. But it hasn't."[23]

ACT Goes to the FTC

In November of 1971, ACT made its first attempt at dealing with the Federal Trade Commission, asking for a ban of all drug and vitamin commercials directed at children on television. Mrs. Sarson appeared before the FTC's hearings on the matter, carrying a statement by Dr. Frederick H. Lovejoy, executive secretary of the Boston Poison Information Center, which said that vitamin pills are the second most commonly ingested poison by children under five.

Too many vitamins, said Dr. Lovejoy (*Christian Science Monitor*, 11-10-71), can be dangerous, and children older than one year don't really need them anyway since properly selected foods provide enough of them.

Mrs. Sarson also included a statement from the director of Duke University's Poison Control Center, Dr. Jay Arena, who warned (*Christian Science Monitor*, 11-10-71) that "vitamin pills and other medicines should never be advertised to small children." The two poison centers indicated that about 4,000 cases of vitamin poison were reported each year, with symptoms from diarrhea to shock.

ACT's petition asked the FTC to file charges of false and misleading advertising against Miles Laboratories (maker of Bugs Bunny, Flintstones and Chocks vitamins), Bristol-Myers (maker of Pals vitamins) and Sauter Laboratories (maker of Zestabs vitamins). ACT also asked that the three networks and their Boston affiliates be indicted.

The petition noted that these three drug companies manufacture chocolate-coated vitamins with iron in the form of chocolate chip cookies and that children associate the medicine with candy and cookies. The companies also were cited for advertising the pills as a means for making friends by becoming a member of a "club" of children who take vitamins.[24]

Miles Laboratory, one of the companies involved, said (Washington Post 5-29-72) its vitamin products are not strong medicines or drugs, but merely nutritional foods. Many children's diets, it said, lack enough vitamins and nutritionists supported the use of the company's vitamin supplements. "The implication by ACT that the vitamins are poisons and constitute a health hazard to children is grossly misleading and does a disservice to the nutritional well-being of the American public," Miles Laboratory said.

In an editorial entitled, "Cop-out," *Broadcasting* magazine said:

> In its petition ACT accuses television of causing children to take unsupervised doses of vitamins—the principal object of its complaint. The connection is never proved: it is merely asserted. Nor is there any showing that an elimination of drug advertising would reduce the incidence of drug ingestion by the very young. The most conspicuous omission in the complaint is any reference to parental obligations to keep drugs out of children's reach.[25]

Transcripts of the commercials were submitted to the FTC. Although most of them were broadcast nationally, ACT was careful in its complaints to specify only the Boston stations that it had monitored.

Mrs. Sarson's group did not wait for the FTC to ban drug and vitamin commercials before making new demands. This time ACT filed (St. Louis *Post-Dispatch*, 12-16-71) a petition with the FTC urging a ban on toy ads in children's programing, saying the ads were misleading and took advantage of children.

Children do not have the maturity or the experience to analyze what is called the "normal puffery" claims of commercials, ACT said. Moreover, children have little money and cannot buy most of the toys which are advertised. This means they pressure their parents into buying or refusing to buy, and this often creates a strain on the parent-child relationship, ACT said.[26]

At the time of the petition to ban toy advertising, ACT also announced it would submit a request to the FTC in January of 1972 that food advertisements be banned during children's programs. As reported in *Broadcasting* magazine, ACT said:

> In the past few years the amount of TV advertising directed to children has increased. Earlier, ads for children were for child-oriented products such as toys and cereal. Today vitamin pills, frozen dinners, bread, gasoline, shoes and snack foods are all being advertised directly to children with the clear implication that they should pressure their parents into buying the adult oriented products.[27]

As ACT had promised, in January it filed its formal request with the FTC to ban food ads on children's TV. The request contained a summary report of a study done by F. Earle Barcus, professor of communications research at Boston University. Barcus had monitored children's television programs during the last half of 1971 and found that commercials on Saturday morning had increased during that period. On the average, commercials interrupted the programing every 2.1 minutes at the end of 1971, compared with every 2.8 minutes six months perviously.

ACT Gets Some Results

In spite of the inaction of the FCC and of the FTC, ACT began to see some results of its campaign that were more than just words. On July 12, 1972, *Variety* reported that the Association of National Advertisers (ANA) had issued a new set of guidelines for children's advertising on TV, due to mounting public pressure, "mostly from Action On (sic) Children's Television," and from the FTC and the FCC. At a press conference on July 6, General Foods marketing vice president F. Kent Mitchel, head of the ANA, said the new guidelines are not "rigid and inflexible rules," but "principles." The four principles listed in the guide are that advertisers

1) should be aware of the limited ability of children to ferret out the truth of advertising and to take that responsibility on themselves,
2) should recognize children's belief in fantasy and not to use that to get them to expect "unreasonable performance,"
3) should take special care that truth and taste be used in commercials and,
4) should create advertising which would help "develop social standards which are generally regarded as positive and beneficial."[28]

The ANA also spelled out rules which advertisers should never violate:

> —not leading a child to think that owning a product will make him better than his fellows,
> —not undermining the child's belief in his parents, or of others in a position to guide him,
> —avoiding ads which take advantage of the child's inability to separate reality from fantasy,
> —barring program personalities or characters from selling products in or adjacent to his appearance,
> —not asking kids to pressure parents to buy,
> —staying within the bounds of literal truth in ad claims.[29]

The two members most responsible for drawing up the ANA guidelines were Jerry Denko of General Mills and Jerry Souers of Mattel, Inc. The latter company is a toy manufacturer and responsible for "Romper Room." No longer would the hostess on "Romper Room" advertise products, and the company agreed to "cut down on" plugs that were not clearly marked as ads.

ACT was not impressed with ANA's action. A group statement called the guidelines "filled with rhetoric which does not protect our children, but rather protects the advertisers and broadcasters."[30]

But within the month, ACT received some letters that pleased the group very much. The New York *Times* announced that three major drug companies—Miles Laboratories, Bristol-Myers and Hoffmann-LaRoche (Sauter Labs)—had separately informed ACT that they would discontinue vitamin advertising on children's television programs.

Robert Wallace, vice president for consumer products of Miles Laboratories, said (New York *Times*, 7-21-72) in a letter to ACT:

> We have become increasingly convinced that continued advertising of our children's vitamin supplement products in the present type of environment of children's television programs has become no longer in our interest; this relates especially to some of the highly questionable programing as well as the number and nature of commercials presently being aired at the Saturday morning time period.

ACT announced (Providence *Journal*, 7-21-72) that it would follow up "this victory" with an appeal to the regulatory agencies "to set rules immediately to eliminate all advertising on children's TV programs." Mrs. Charren said that the drug companies withdrew the vitamin advertising voluntarily and that "certainly, there was no question of coercion."

There was no immediate indication how dropping the ads would affect the sale of the children's vitamins. "Nobody seems worried," said Robert Kaufman, a spokesman for Bristol-Myers.

On January 4, 1973, an ACT study was released (New York *Times*, 1-5-73) that said all commercials from children's programing could be eliminated over a five-to-seven-year period without "cataclysmic" financial results. The study that was undertaken for ACT by Dr. William H. Melody, of the University of Pennsylvania's Annenberg School of Communications, said the networks could replace commercial sponsorship of children's programs with government funding, institutional advertising and private underwriting.

The study, which was to become a part of ACT's petition to the FCC to ban all commercials from TV programing for children, contradicted the Commission's own report released the previous spring by Dr. Alan Pearce, an official of the agency. The Pearce study, Melody said, reached its conclusion without considering possible changes in the existing broadcast structure for children's programing:

> When it is recognized that institutional change does not have to take place instantaneously with cataclysmic economic consequences, it becomes clear that policy makers can phase in the new policy at whatever rate they find most compatible with the public interest.

The Melody plan would have the FCC supervise the restructuring of children's programing practices, which would begin by requiring each network to carry one hour a week of children's programing without commercials, as would all local stations. Melody said he thought this would cost the networks and stations "about $2 million the first year." Eventually, money would be obtained for children's programing from industry, the government and institutions and would be channeled to production units free of network control. The networks would distribute and transmit the programs, while individual stations would contribute the free air-time. The five-to-seven year plan would avert the sudden serious loss of income broadcasters met when cigarette advertising was banned. Depending on the availability of outside financing, Melody said, the objective could be obtained in four years or could be stretched to 10 years.

A spokesman for NBC said (New York *Times*, 1-5-73) "Dr. Melody's view is simply a surmise on his part and one with which we disagree." A CBS spokesman said, "We disagree with Dr. Melody's general concept, but prefer to defer further comment until we have examined his full study."

Advertisers also reacted to the Melody plan. James Neal Harvey, president of James Neal Harvey, Inc., Advertising, wrote (New York *Times*, 1-14-73) that in all the years of controversy over advertising on children's television, "there has not been one shred of evidence produced that suggests exposure to television commercials is in any way harmful to children."

On the contrary, wrote Harvey, studies conducted by "highly respectable companies" like Milton Bradley, General Mills and Ideal Toy, have indicated that "children are a lot smarter about television advertising than many people apparently think." Children, even at preschool ages, know that a commercial is a commercial and that its purpose is to try to sell a product, Harvey said. Children, by and large, like TV commercials and they are not fooled by them. Harvey quoted a Roper survey taken in 1972 that said that 78 percent of the parents polled thought it was all right to have commercials on children's television.

Harvey wrote that ACT's motives go a lot deeper than "the ambition to replace Bugs Bunny with Beethoven":

> I believe it is that a lot of people in this country think that there is something fundamentally wrong with trying to offer a product for sale to a child, and that functions of our free enterprise system of producing, promoting and selling goods at a profit are rather immoral facts of life from which children should be shielded.

Harvey's article brought a number of protesting letters to The New York *Times*, including a letter signed by Peggy Charren and Evelyn Sarson. A doctor from Scarsdale, New York, Bernard L. Albert, wrote (New York *Times*, 1-28-73):

> Because of their personal experience in discovering that advertising on TV does in fact, exaggerate, misrepresent and overglamorize the products, my children do not trust TV advertising and are wary of any product so advertised. The efforts of advertisers to "hard-sell" to children is producing a generation that will mistrust all advertising.

Another writer, Sam Lanfranco, assistant professor of economics at McMaster University in Hamilton, Ontario, took objection to Harvey's intimation that opponents of children's advertising were against the free enterprise system. The letter concluded:

> Adam Smith was never a defender of institutions which pitted child against parent and one need not be engaged in a dark plot to overthrow American free enterprise to suggest that the existence of children's advertising on television raises a legitimate ethical issue.

Another letter-writer, Claire Barrett, of Concord, Massachusetts, noted that time devoted to advertising during children's programing was greater than during adult viewing hours. Wrote Miss Barrett, "Either children are exploited by advertising, or they are indeed as sophisticated as Mr. Harvey says and the industry is wasting its money. Mr. Harvey can't have it both ways."

But there were some signs that the industry was not just wasting its money and was beginning to "advertise" in different ways. ACT, usually the critic of the advertisers, began giving praise. In February, 1973, ACT gave "special commendation" to Sears, Roebuck Foundation, Xerox Corporation, Mobil Oil Corporation, General Foods, Quaker Oats Company and IBM for underwriting the cost of children's fare on public TV without commercials.[32]

ACT also praised Miles Laboratories, Sauter Labs, division Hoffmann-LaRoche and Bristol-Myers for pulling their vitamin advertising out of children's programing and moving it to grown-up TV periods. Praise also went to the companies that were underwriting new children's programs such as "Sesame Street," "Electric Company" and "Misterrogers Neighborhood." ACT cited 43 commercial stations that were broadcasting "Sesame Street" regularly without any commercials, and mentioned specific programs that each of the networks were now producing for children. Also, praise went to "The Waltons," the National Geographic Society specials and Jacques Cousteau's undersea explorations, with ACT's accompanying note that all of these shows had high ratings, a fact that negated claims previously made by broadcasters that the top quality family programs were difficult to sell to audiences.

But ACT's comments were not limited to words of praise. "Brickbats" went to the networks for scheduling some children's specials when young ones are ready for bed, and for continuing adult soap operas when many youngsters are home from school. A special "disservice citation" went to stations which carry adult reminders during the Saturday morning children's hour. ACT said that on a recent Saturday morning, public service spots told New York children that the Social Security office could give them protection, that the Army needed young men, that the National Alliance of Businessmen wanted to get all men working, and that dogs and cats should be spayed.

ACT had other awards:

- a marshmallow to the NAB Code Authority "for being too squishy to enforce any of the beautifully worded regulations it keeps passing."
- two marshmallows to the National Advertising Review Board for doing so little that former Governor Leroy Collins resigned from the group.
- three marshmallows to the Association of National Advertisers for "carefully designing some guidelines on advertising that won't affect a single commercial on the air."
- a leaky gas tank to Arco and Shell for advertising to children by means of toy premiums, "proving conclusively that you can sell gasoline to someone without a car."
- one year's dental bills to all makers of candy and snacks advertised to children on television.

Later in the year, ACT initiated (New York *Times*, 7-22-73) its first annual ACT Bent Antenna Awards. Most of the "awards" made the same points as listed above: for example, a Mickey Mouse Watch to the networks for running children's specials in the evenings and adult programs in the afternoons. But there were a few new ones: for example, a carton of throat lozenges to all those noble individuals who sat and laughed so that animated cartoons on Saturdays could have hysterical laugh-tracks during explosions and conflicts.

In early October, 1973, ACT enjoyed the success of the KTTV agreement in Los Angeles that banned a number of children's programs that ACT and several other organizations had considered "violent." "That's going a bit too far," Gene P. Mater, vice president of CBS' broadcast group, said. "What Peggy and her friends are trying to do is restructure the whole bloody industry."

As the years went on, ACT's annual symposium on children's television became more and more prestigious. *Broadcasting* magazine (which began its report by reminding its readers that "in some circles" Mrs. Charren has the nickname, "Wicked Witch of the East") reported that at the March 31, 1974, meeting in Washington, D.C., ACT attracted some 1,200 broadcasters, producers, educators and parents, as well as "government watchdogs, including FCC Chairman Richard E. Wiley."[33] ACT came with a collage of children's television programs from around the world, hoping to prove "there is some TV worth watching."

But, as usual, critics of children's television were in attendance. Jona Gussow, a nutrition educator at Columbia University Teachers College, demanded that consumer advertising messages must do nothing less than teach "how not to consumer anything unless absolutely necessary." Consumer education will necessarily offend some, she said, including "most sponsors."

Ralph Nader was also there. He congratulated ACT for its efforts in children's television and said ACT served as a "prototype," illustrative of how people "without any power" have created a movement that is "rising, soaring." The greatest force behind government is people, Nader said, and then he advised ACT to sue the FCC for "non-action" on its petition submitted in 1970 before the organization is renamed "Action for Grandchildren's Television."[34]

Broadcasting concluded its report:

> What began six years ago as a group of mothers concerned about children's viewing, packed the Kennedy Center last week for its panels and programing offerings. What's next? "Maybe the moon," Mrs. Charren said.

Mrs. Charren had some reason to be optimistic. Since January of 1974, ACT and other groups (notably the Council on Children, Media and Merchandising, represented by founder and chairman Robert B. Choate) had been able to present their case at a succession of Congressional hearings in Washington. Also, ACT noted (New York *Times*, 5-12-74) that West Germany had moved to curb hard-sell advertising on children's television and the Canadian Government would begin banning all TV advertising to children on the state-owned Canadian Broadcasting Corporation beginning in January of 1975.

Choate testified before the Senate Commerce Committee that in motivational research houses across the country, children were being used in laboratory situations to formulate, analyze, polish, compare and act in advertisements that were designed to make other children salesmen in the home.

But government agencies were still reluctant to make any rulings. FTC Chairman Lewis Engman said before the Commerce Committee that "our agency does have the prime responsibility to move with respect to the content, deceptiveness and unfairness of children's advertising."

Nevertheless, Engman said:[34]

> I have some concern as to whether or not we in fact do have the jurisdictional authority to do such things as, say, regulate the numbers of commercials which may appear on a given program. That historically has been the function of the FCC.

And in related testimony, Richard Wiley, then newly appointed chairman of the FCC, said (New York *Times*, 5-12-74):

> Let me say that I consider this a very important issue. These people, children, are not just little consumers, they are one of (the nation's) greatest resources. But I think we have to be very careful about the areas in which the FCC can and should move.

Mrs. Charren responded to the testimony of the two chairman by saying that "action and responsibility for the issues posed by children's television will be relegated to an unfathomable abyss somewhere between the two regulatory agencies."

The agencies and the industry again seemed to think that the real answer was in self-regulation. But Choate, who expressed concern that his four children were cynical, disenchanted with private enterprise perhaps due to being tricked or lied to by TV commercials, said that pinning hopes for significant reform on the industry's willingness to regulate itself is "like sending the goat out to mind the garbage."

Meanwhile, the FCC's Alan Pearce continued to look into the feasibility of non-commercial children's television and in June, 1974, released a study that confirmed many of the findings of Dr. William H. Melody. Pearce said the networks would lose little advertising revenue from children's shows if it simply cut back the number of advertising minutes per show and raised the cost of the time slots. After all, there were so few advertisers competing for the advertising slots during children's show times (Kellogg, Mattel and General Mills alone accounted for 30 percent of the revenues).

Pearce said a 25 per cent reduction in commercial content would reduce CBS's revenue by \$6.3 million, but CBS would still net a \$10 million profit from children's television programs. The same 25 per cent cut would reduce NBC's profits from \$3.7 million to \$1 million, and ABC's from \$7.2 to 3.5 million. Pearce concluded that commercials could be reduced to 7½ minutes from the current average of 9 to 10 minutes per hour on Saturday mornings, and 12 to 16 minutes per hour on weekdays.[35]

The FCC had debated for a long time whether broadcasters could afford to improve children's programing while simultaneously reducing the number of commercial minutes per program. Pearce had provided some answers. In May, 1974, in a speech in Atlanta, Chairman Wiley had warned that the Commission would adopt its own remedies

for the problems it saw in children's programing and advertising unless the broadcasters acted voluntarily to deal with those problems.[36]

A month later the National Association of Broadcasters began to act. It ratified recommendations of its code review board restricting both advertising time and content of children's programing. Advertising was to be reduced to 10 minutes per hour in 1975 and to 9½ minutes in 1976. On weekday programing, nonprogram time was limited to 14 minutes per hour in 1975 and to 12 minutes in 1976.[37] The board also approved provisions requiring that program and advertising content be separated by an "appropriate device."

Three weeks later, the Association of Independent Television Stations (INTV) adopted similar guidelines.

And, finally, on October 24, 1974, after more than four years of testimony and debate, the FCC adopted a policy statement regarding children's television programs that would set levels of advertising in accordance with the limits established by the NAB and the INTV.

Other points made in the policy statement called on broadcasters to:

> —provide a "reasonable amount" of programing for children—a "significant portion" of it educational in nature."
> —meet the "special needs" of pre-school children.
> —air children-oriented programing throughout the week, and not only on weekends.
> —avoid "host selling" and "other techniques that confuse the distinction between programing and advertising content."
> —provide for "clear separation" between programing and advertising.[38]

The Commission did not define either "reasonable" or "significant." Mrs. Charren found the Commission's statement "disappointing and disturbing."[39]

But ACT did not quit. Later in November, it announced (Los Angeles *Times*, 11-18-74) the marketing of a new game called "Switch," to be sold for \$1.50, "to let families know there's something else to life than television."

The game starts with an imaginary TV set switched "on," but after a player makes 56 moves, fewer if luck prevails, victory is won and the set is switched "off." The game has 10 draw cards that let the players make one to 30 commercials, one technical difficulty, one station break and 19 shows with names like "The Braided Bunch" and "Tarred Wreks." En route, players get five "switch" alternatives, such as one switch to public TV or a switch "from buying a toy to making one." The players pick their commercials from a stack of commercial cards for such imaginary goodies as "Glop Top," a soft drink, or "Capri-Cavity Granules." They have to get rid of the cards to move to new positions.

The game was to be sold only by ACT, not in stores, and first-round printing was for 20,000 "Switch" sheets. Mrs. Charren said ACT would not make any money on the game, and would lose even if it would sell them all. "But we felt the important thing about the game was its educational aspect. We're not using this as a fund-raiser."

ACT did not merely accept the FCC policy statement.

According to the December 2, 1974, edition of *Broadcasting* magazine, "the little band of Boston mothers who first aroused the FCC's interest in the subject, has filed notice of its intention to appeal the FCC's policy statement."

The editorial entitled "Not Again" warned that the "courts could agree with ACT and remand the case for the harsher actions that ACT originally petitioned the FCC to take." The editorial again urged "the healthy answer" of "individual responsibility."[16]

ACT In 1975

In 1975, ACT announced it had received a grant of $165,000 from the Carnegie Corporation of New York. The grant was to be used for the development of local chapters and for a national fund-raising campaign. ACT had come a long way from its first year when, operating out of Mrs. Charren's home, the officers collectively contributed $3,000 toward expenses. In 1970, ACT received a $6,000 grant, and in 1971 received $164,000, which enabled it to rent office space and become self-supporting. In May, 1974, ACT received (*Wall Street Journal*, 8-5-74) two grants, one from the Ford Foundation totaling $300,000 over two years, which enabled Mrs. Charren to begin drawing a $12,000 salary. Grants had come from the John and Mary R. Markle Foundation, the Consumers Union, the Center for Understanding Media, and the National Citizens Committee for Broadcasting.

But the Carnegie grant was intended (New York *Times*, 3-5-75) to help the group become self-sufficient through the development of "an active national membership." Mrs. Charren said the money would be used to involve thousands of others in media reform at the local level.

Mrs. Charren said (*Christian Science Monitor*, 3-7-75) local chapters were already at work. An organization at the University of Mississippi had succeeded in placing an educational program, "FunShop," on WTWV-TV in Tupelo, Mississippi, once a month, without commericals. The program, designed for children from three to eight years old, was deemed important by the local group because Mississippi has no kindergarten program.

Another ACT associate, Julie Quincy Jones, of Buffalo, New York, president of Consumer Forum, Inc., and her co-workers stopped a nutritionally deficient cereal from being marketed in western New York by General Mills. Mollie Miller of Pittsburgh, with her 10 active ACT members, saw to it that public service nutrition announcements became a regular part of local programing, as well as spots advising on the wise use of TV by child viewers themselves. Amanda Wallner of Lansing, Michigan, and her group threatened a petition to deny WJIM's license and thereafter the CBS affiliate met and consulted regularly with parents.

In addition to establishing local chapters, ACT continued its other activities. On April Fool's Day, 1975, ACT again issued its "Bent Antenna" awards, this time to nine "professionals in the broadcasting field who have assigned a higher priority to their own interests than to children's needs."[17] A few examples:

—A sugar 'lobby-pop' to the FTC for pretending it doesn't know whether sugar causes cavities, to avoid action on ACT's three-year-old petition to eliminate the selling of highly sugared foods on children's television.

—The 'Waterpik' award to M&M Mars for pushing candy to kids and creating service announcements for children "blaming cavities on plague."

—The self-serving citation of the year to the NAB Code Authority for deciding kids are less vulnerable during the week than on weekends, and cutting back commercial time on the latter but not the former

—A fire extinguisher to WGN-TV, Chicago, for showing a movie promo with a man being burned at the stake during the kiddie program, "Bozo's Circus."

A couple of weeks after the awards, the FTC announced (Louisville *Courier-Journal*, 4-12-75) it would not ban advertising for food from children's television. Instead, the FTC said it would continue to issue rules on ad techniques that are unfair or deceptive regardless of the product and would continue to police deceptive ads on a case-by-case basis. FTC Chairman Lewis Engman and Commission member Elizabeth Hanford partly dissented, saying they would have opened a rule-making proceeding about the fairness of advertising sugar-laden foods on children's television.

But in June, 1975, the NAB met (Washington *Star*, 6-3-75) at the Washington Hilton to examine "the emerging FTC and FCC regulations concerning children's television, and to find out what kind of shows local communities are doing." ACT was not invited, but it was "generally conceded" that ACT, consumer advocate Robert Choate and other consumer groups concerned with children's television and advertising were the compelling reason for the conference. Director of consumer protection for the FTC, J. Thomas Rosch, noted that the National Science Foundation had received a $100,000 grant to conduct the first of a three-part research project on the impact of commercials on children's television. Generally, FCC and FTC officials praised the industry for its voluntary self-regulation.

At one panel, Mrs. Charren asked Jerome Lasner, assistant director of NAB's Code Authority, whether he was including sugar in products dangerous to health. "'No,' answered Rosch succinctly, to a round of laughter." A toy representative, speaking with Lasner after the panel, said (Washington *Star*, 6-3-75) said, "Those ACT girls. I hate them with a purple passion."

In November, ACT was in Atlanta for its fifth annual conference. According to reports by Judy Flander (Washington *Star*, 11-5-75), little was accomplished except three days of griping.

Senator Frank Moss told the convention:

> ACT represents the most significant grass roots effort at consumer protection that exists today . . . ACT was born out of the dawning of the insight that the great promise of television has been perverted into mind-rotting commercial exploitation of our nation's children.

Another speaker was Dr. Stephen P. Strickland, co-author with Douglass Cater, of "Television Violence and the Child." Strickland said some important people in the industry still thought of ACT merely as "the ladies from Boston," and one network president not long ago referred to ACT and its leaders as "the enemy," Strickland continued:

> I'm simply suggesting that ACT is neither — that it is more than a group of ladies and less than the enemy . . . I predict that ACT will be around at least as long as the current hierarchy of the television industry and longer than present members of the Federal Communications Commission.

As 1975 went into its final month, ACT was indeed still around. On December 15, Mrs. Charren announced at a New York City press conference that two studies of children's programing, which had been commissioned by ACT, had been completed by Dr. F. Earle Barcus of the Boston University School of Public Communications: "Weekend Commercial Children's Television," and "Television in the After-school Hours." The studies showed that commercial messages interrupt programs directed to the under-12 audience "on an average of once every 2.9 minutes," and "almost half of all commercial announcements were for cereals, candies and sweets."[42]

Mrs. Charren said the studies "negate the argument of the FCC's Policy Statement on Children's Television that self-regulation is an adequate solution to the problem of children's TV."

Dr. Barbus also stressed that while network children's programs had reduced "obvious portrayals of violence," his study of independent stations found that "nearly two-thirds of independent programs contained some form of violence and three in 10 were judged to be 'saturated' in violence."[43] *Broadcasting* magazine reported that some of the stations' logs differed from the findings of Dr. Barcus.

As the year ended, ACT had not won all of its battles by any means, but it had made its work felt. With a staff of six full-time and eight part-time employees and more than 5,000 dues-paying members, ACT was not about to fold up its tent and disappear.

FOOTNOTES

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3. Melinda Elledge, "Action for Children's Television (ACT)," Freedom of Information Center Report No. 265, August, 1971, p. 2.
4. Gross, "Television Under Pressure," p. 5
5. Robert Lewis Shayon, "The Kidvid Ghetto," *Saturday Review*, January 20, 1970, p. 21.
6. Elledge, "Action for Children's Television," p. 1.
7. Gross, "Television Under Pressure," p. 6
8. FCC Report No. 9621, January 21, 1971.
9. Letter to the FCC, March 11, 1970
10. "The Broadcasters' Say on ACT's Proposals," *Broadcasting*, July 5, 1971, p. 8.
11. "Child's Play," Editorial, *Broadcasting*, January 25, 1971, p. 66.
12. ACT Newsletter, Fall, 1970.
13. "Parents Group Sets Attack Against Toy Makers' Yule Drives," *Advertising Age*, November 23, 1970, p. 50.
14. FCC Report No. 9554, December 17, 1970.
15. Federal Trade Commission News, December 22, 1970
16. FCC Docket 19142, January 26, 1971.
17. Concurring Opinion of Commissioner Nicholas Johnson, FCC Notice of Inquiry and Propsed Rule Making, January 20, 1971
18. "FCC Moves Against Children's TV," *Broadcasting*, January 25, 1971, p. 21.
19. "ACT Sets Off on Different Tack," *Broadcasting*, March 1, 1971, p. 34.
20. "ACT's May Day Kidvid Tuneout," *Variety*, April 14, 1971
21. Elledge, "Action for Children's Television," p. 5.
22. ACT Newsletter, Fall, 1970.
23. Elledge, "Action for Children's Television," p. 6.
24. Thomas Neale, "Action for Children's Television," Unpublished Report, Freedom of Information Center, April 12, 1975.
25. "Cop-out," Editorial, *Broadcasting*, November 15, 1971, p. 74
26. "ACT Goes Back to the FTC," *Broadcasting*, December 20, 1971, p. 45.
27. *Ibid.*
28. "ANA Issues Guidelines For Kidvid Blurbs, But ACT's Not Impressed," *Variety*, July 12, 1972.
29. *Ibid.*
30. *Ibid.*
31. "ACT Study Offers Plan to Delete Commercials from Children's Shows," *Broadcasting*, January 8, 1973, p. 22.
32. "ACT Limns, Boos Kids' TV Advertisers," *Advertising Age*, February 26, 1973, p. 135.
33. "ACT Takes Its Show to Washington," *Broadcasting*, April 8, 1974, p. 22.
34. *Ibid.*, p. 24.
35. Alan Pearce, "The Economics of Children's Television," FCC, June, 1974.
36. "Wiley Says FCC's Coming Close to Action on Children's Advertising, Programing; He Lays Blame on Broadcasters for Inertia," *Broadcasting*, May 27, 1974.
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42. ACT Press release, December 15, 1975.
43. "ACT Says Stations Aren't Living Up to Rules on Ads in Children's TV; Stations Say Group is Way Off Base," *Broadcasting*, December 22, 1975, p. 29.