

May 22, 2026

*Submitted via ECFS (<https://www.fcc.gov/ecfs>)*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**RE: FCC’s Media Bureau Seeks Comment on Further Empowering Parents to Protect their Children and Make Informed Choices About the TV Programs Their Children Watch, MB Docket No. 19-41**

Dear Secretary Dortch:

We are scholars with Ethics and Public Policy Center’s (EPPC) Administrative State Accountability Project (Eric Kniffin and Rachel N. Morrison), Person and Identity Project (Mary Rice Hasson, Theresa Farnan, and Maddy Pelletier), and Bioethics, Technology, and Human Flourishing Program (Chloe Lawrence). We write to offer public comment in response to the Federal Communications Commission’s (FCC) Public Notice, “FCC’s Media Bureau Seeks Comment on Further Empowering Parents to Protect Their Children and Make Informed Choices About the TV Programs Their Children Watch” (“Notice”).<sup>1</sup>

As the FCC’s Media Bureau states in its Notice, in the Telecommunications Act of 1996, Congress recognized that the “pervasive” presence of television programming in children’s lives “influences children’s perceptions of the values and behavior that are common and acceptable in society.”<sup>2</sup> Consequently, “Congress then determined that parents should be provided with timely information about the nature of upcoming video programming and have the ability to block violent, sexual, or other programming that parents believe is harmful to their children.”<sup>3</sup> The Media Bureau seeks public comment on the composition balance and accountability of the TV Parental Guidelines Monitoring Board (also referred to by the FCC as the “TV Oversight Management Board” or TVOMB) and on the accuracy of TV ratings. Specifically, the Bureau is seeking input on how to empower parents when it comes to media, such as by including family-oriented perspectives and faith-based organizations on the Board and by including ratings that inform parents when “gender identity themes” are discussed or displayed.<sup>4</sup>

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<sup>1</sup> 91 Fed. Reg. 23990 (May 4, 2026), <https://www.federalregister.gov/d/2026-08624>.

<sup>2</sup> *Id.* at 23991.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.* at 23991-92.

We applaud the FCC for seeking to empower parents to protect their children and make informed choices when it comes to media. As we explain below, the Board is not sufficiently balanced—it is stacked with industry insiders and pro-gender ideology advocacy groups. Also, the current oversight and ratings system is inadequate. To remedy these issues, we support the inclusion of parents, people of faith, and faith-based media on the Board and urge the FCC to strengthen the media ratings by ensuring that the ratings apply to specific episodes, not just programs or series, and by including warnings about LGBTQ themes and gender ideology content. These recommendations align with Trump Administration priorities to protect parental rights, protect children, fight gender ideology, and promote religious liberty.

**I. The TV Parental Guidelines Monitoring Board is not “sufficiently balanced.”**

The FCC has asked whether the composition of the TV Parental Guidelines Monitoring Board, which exercises oversight of the industry-led ratings system, is “sufficiently balanced to represent a broad range of stakeholders outside of the entertainment industry.”<sup>5</sup> It is not.

**A. The Monitoring Board is loaded with industry insiders and progressive groups.**

The Monitoring Board includes up to 24 industry representatives and up to five “public interest” representatives.<sup>6</sup> According to the Board’s 2025 Annual Report,<sup>7</sup> the Board is now composed of the following:

**Industry members (broadcast / cable / streaming / trade):**

- A+E Networks
- AMC Networks
- Disney ABC Television Group
- Fox Corporation
- NBCUniversal
- Paramount
- Warner Bros. Discovery
- TelevisaUnivision
- Versant Media
- R2P Strategies
- Motion Picture Association (MPA)
- National Association of Broadcasters (NAB)
- NCTA – The Internet & Television Association

**Public-interest members:**

- American Academy of Pediatrics
- Boys & Girls Clubs of America
- National PTA

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<sup>5</sup> *Id.* at 23992.

<sup>6</sup> See TV Parental Guidelines Monitoring Board, *About Us*, <https://tvguidelines.org/aboutUs.html>.

<sup>7</sup> TV Parental Guidelines Monitoring Board, *Annual Report 2025*, [https://www.tvguidelines.org/resources/TV\\_Parental\\_Guidelines\\_2025AnnualReport.pdf](https://www.tvguidelines.org/resources/TV_Parental_Guidelines_2025AnnualReport.pdf).

- Entertainment Industries Council
- Call for Action

From its inception, the Monitoring Board has reflected the industry’s progressive tilt, not American parents’ concerns. The organizations that currently occupy the “public interest” seats have demonstrated little concern for the interests of parents, particularly conservative and religious parents, in obtaining reliable information about the content of children’s programming—notably LGBTQ themes and pro-“gender identity” content. To the contrary, several of the “public interest” members are strong public advocates *for* the promotion of gender ideology to minors and *against* the rights of parents to obtain information about the effects of gender ideology *on their own children*.

For example, the **American Academy of Pediatrics (AAP)** is a leading institutional promoter of gender ideology, and the purveyor of an error-ridden set of pediatric guidelines regarding the care of identity-distressed children.<sup>8</sup> The AAP has filed numerous briefs in federal courts, including amicus briefs at the Supreme Court, supporting the provision of sex-rejecting procedures to minors. The AAP’s consistent policies, including its 2026 Policy Statement on *Principles for Health Information Technology to Support and Protect Adolescent Confidentiality*, consider it “imperative” that pediatricians maintain “adolescent confidentiality” by withholding an adolescent’s “sensitive” information about “gender identity, sexual behaviors, or reproductive health” from parents, absent the minor’s consent to share the information.<sup>9</sup>

The AAP’s professional journal, *Pediatrics*, has published numerous articles and practice guides supporting the provision of sex-rejecting procedures to minors, and withholding information from parents about a child’s expressed “gender identity” or sexuality.<sup>10</sup> In short, the AAP has demonstrated insensitivity towards parental concerns about gender ideology and a thoroughgoing disregard for parents’ rights to be informed about their child’s issues related to sexuality and “gender identity.” The AAP cannot be trusted to advocate for parental empowerment over children’s programming when it comes to concerns over “LGBTQ” content, including “gender identity” content.

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<sup>8</sup> See Jason Rafferty et al., *Ensuring Comprehensive Care and Support for Transgender and Gender-Diverse Children and Adolescents*, 142 *Pediatrics* e20182162 (2018), <https://publications.aap.org/pediatrics/article/142/4/e20182162/37381/Ensuring-Comprehensive-Care-and-Support-for?autologincheck=redirected>.

<sup>9</sup> American Academy of Pediatrics (AAP), *Principles for Health Information Technology to Support and Protect Adolescent Confidentiality: Policy Statement* (2026), <https://publications.aap.org/pediatrics/article/157/3/e2025075747/206452/Principles-for-Health-Information-Technology-to?searchresult=1>.

<sup>10</sup> See, e.g., Katz-Wise, et al., *Developing Parenting Guidelines to Support Transgender and Gender Diverse Children’s Well-Being*, 150 *Pediatrics* e2021055347 (2022). See also AAP, *Bright Futures Tip Sheets for Clinical Practices* (last updated Feb. 1, 2024), <https://www.aap.org/en/practice-management/bright-futures/bright-futures-in-clinical-practice/bright-futures-tip-sheets-for-clinical-practices/> (urging physicians to “affirm” a child’s purported “gender identity” from the earliest ages and to provide “confidential” care to minor patients, which betrays bias in suggesting that parents’ refusal to approve sex-rejecting interventions raises concerns about the child’s/adolescent’s welfare and safety.)

Other industry and “public interest” Board representatives are similarly ill-suited to the task of protecting parents’ rights to be informed about the content of children’s programming. **The National PTA** has passed numerous resolutions advocating for policies and laws that privilege “gender identity” over the reality of sex, and which promote gender ideology in government K-12 schools.<sup>11</sup> Similarly, **the Boys & Girls Clubs of America** endorse and promote the beliefs of gender ideology, encouraging adults to expose children to “media and activities that feature LGBTQ themes.”<sup>12</sup>

While these three “public interest” members are aggressively progressive, the two remaining “public members” do not focus on children or families at all. The **Entertainment Industries Council (EIC)** was created *by and for the entertainment industry*.<sup>13</sup> It works *inside* the content-creation ecosystem to shape messaging. It is, functionally, an industry-embedded advisory group. At bottom, *the EIC looks much more like another industry member than a public interest member*. Additionally, the EIC is captured by gender ideology: it recommends that shows “use preferred pronouns” when “depicting transgender or gender non-conforming youths.”<sup>14</sup>

The final “public interest” member of the Monitoring Board is **Call for Action (CFA)**, whose mission does not focus on parents or children at all; it is “an international, nonprofit network of consumer hotlines.”<sup>15</sup> Its stated mission involves “assist[ing] consumers through mediation and education to resolve problems with businesses, government agencies, and other organizations.”<sup>16</sup> Its “Guides & Fact Sheets” covers topics like “Consumer Advice for Timeshares,” “5G Wireless Internet,” “Vision Care Consumer Guide” and “Used Car Buyers Guide.”<sup>17</sup> Nothing about children or parents.

In short, the Monitoring Board is made up of industry representatives—which are the *source* of the problem—three pro-gender ideology “public interest” groups, and “an international, nonprofit network of consumer hotlines.” This falls far short of what Congress had in mind.

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<sup>11</sup> See National PTA, *Search Results: “gender identity”* (last visited May 22, 2026), <https://www.pta.org/search-results?keywords=gender%20identity>.

<sup>12</sup> Boys & Girls Club of America, *Support LGBTQ Youth Through Inclusive Practices* (June 17, 2019), <https://www.bgca.org/news-stories/2022/May/empower-lgbtq-youth-through-inclusive-practices/>.

<sup>13</sup> See Entertainment Industries Council, *About Us*, <https://www.eiconline.org/about>.

<sup>14</sup> Entertainment Industries Council, *Picture This: Additional & Suicide—Prevention, Treatment & Recovery at 23*, [https://www.eiconline.org/\\_files/ugd/aec3fc\\_be4ce0832631407b87768df103ea9b3c.pdf](https://www.eiconline.org/_files/ugd/aec3fc_be4ce0832631407b87768df103ea9b3c.pdf).

<sup>15</sup> Call for Action, *About Us*, <https://callforaction.org/about-call-for-action>.

<sup>16</sup> *Id.*

<sup>17</sup> Call for Action, *Guides & Fact Sheets*, <https://callforaction.org/guides-%26-fact-sheets>.

**B. The Monitoring Board should add new members that will represent parents and faith-based groups.**

To address the imbalances noted above, the Monitoring Board should add new members that will represent important voices that are currently left out of conversations over the TV rating system.

**The Monitoring Board should include groups that represent the concerns of parents** who seek reliable information to make choices about media content for their children, including “gender identity” content. Given the known concerns about media’s role in catalyzing the “social contagion” of child and adolescent identity distress,<sup>18</sup> the Board needs to include parent advocates who are sensitive to the mounting evidence that gender ideology harms children.

**The Monitoring Board should also include faith-based groups.** As Tocqueville observed, Americans regard religion as “indispensable to the maintenance of republican institutions”—not because religious institutions run the state, but because faith communities shaped the moral habits and family life on which self-government depends.<sup>19</sup> It follows that faith-based group, including religious leaders and religious media, that actually form children’s consciences and family media practices should have a meaningful voice on the TV Parental Guidelines Monitoring Board.

Placing faith-based groups, including faith leaders and religious media, on the Monitoring Board would also help protect “the rights of parents to direct the religious upbringing of their children,” a right the Supreme Court affirmed in *Mahmoud v. Taylor* is part of the “enduring American tradition.”<sup>20</sup> This right is “not merely a right to teach religion in the confines of one’s own home. Rather, it extends to the choices that parents wish to make for their children outside the home.”<sup>21</sup> And, as the Supreme Court recognized in *Mahmoud*, parents are hindered in their God-given responsibility to direct their children’s religious upbringing if they do not know when their children are going to be subjected to gender ideology.<sup>22</sup>

**II. The current oversight and ratings system is inadequate.**

The Monitoring Board represents that “TV ratings are applied on an episode-by-episode basis” to account for variable content in particular episodes.<sup>23</sup> The Monitoring Board also represents that it conducts “spot checks” to ensure that the ratings are being properly applied and

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<sup>18</sup> See Dianna Kenny, *Gender Ideology, Social Contagion, and the Making of a Transgender Generation* (2024), <https://www.taylorfrancis.com/books/mono/10.65325/EB11859/gender-ideology-social-contagion-making-transgender-generation-dianna-kenny> (explaining “why social contagion is a major factor in the upsurge of young people wishing to transition”).

<sup>19</sup> Alexis de Tocqueville, *Democracy in America* vol. I, pt. II, ch. 9, at 283-84 (Liberty Fund ed. 2012), available at <https://oll.libertyfund.org/title/democracy-in-america-english-edition-vol-1>.

<sup>20</sup> *Mahmoud v. Taylor*, 606 U.S. 522, 547 (2025).

<sup>21</sup> *Id.*

<sup>22</sup> *Id.* at 550.

<sup>23</sup> TV Parental Guidelines Monitoring Board, *Ratings*, <https://tvguidelines.org/ratings.html>.

is willing to receive consumer complaints about ratings and address them to ensure appropriate ratings. However, there are many reasons to believe that the Monitoring Board’s current processes are not as successful as the Board itself represents.

**A. The Monitoring Board’s current processes are superficial and not responsive to parents’ concerns.**

According to the Monitoring Board’s 2025 Annual Report, the Board “conducted four spot check audits reviewing program ratings across broadcast, cable and streaming platforms to uphold the consistent application of the TV Parental Guidelines.”<sup>24</sup> In addition, the Report claims that it “maintained timely, responsive communication with the public, addressing questions and concerns about television and streaming programming.”<sup>25</sup>

However, a closer look at the Board’s own data reveals sparse public engagement and only vague assertions about the “spot checks” that supposedly assure the reliability of the TV Ratings.

**1. The Board’s “spot check” process is inadequate and leaves too many unanswered questions.**

The Board states that its spot check process, instituted in 2020, consists of

quarterly reviews through four dedicated groups, each of which includes a public interest board member to ensure a range of perspectives. These groups assess programming across multiple time blocks—early morning children’s content, daytime shows, prime-time programming, and late-night adult content—selecting titles at random from the platforms represented on the Monitoring Board. When discrepancies in ratings are identified, review groups work directly with participating services to resolve them. Matters that cannot be settled at the group level are referred to the chairman, and if necessary, to the full Monitoring Board for final review. Spot checks conducted throughout 2025 reflected the strength and consistency of the ratings system, with just two instances requiring rating changes.<sup>26</sup>

The Board’s spot check process lacks transparency and is short on specifics:

- Who are the members of the “four dedicated groups,” which include at least one “public interest” member?
  - Given the analysis of the “public interest” member provided above, we dispute the Monitoring Board’s claim that including one of the current “public interest” members “ensure[s] a range of perspectives” on important concerns.

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<sup>24</sup> *Annual Report 2025* at 2.

<sup>25</sup> *Id.*

<sup>26</sup> *Id.* at 5.

- The Report claims that these groups analyze “programming across multiple time blocks ... selecting titles at random” to identify any discrepancies between ratings and content. However, it is unclear how many programs are reviewed in each category, or in total.
  - Did the reviewers assess five programs? 25 programs? 100 programs? Did they consider the current ratings on shows in selecting which programs to review?
- “LGBTQ/gender identity” content and content with mature themes have increased markedly in children’s programming since the ratings system was first implemented. This increase may be attributed in substantial part to pressure campaigns from progressive groups like GLAAD to increase “LGBTQ” “representation” and themes in TV programming.<sup>27</sup> Consequently, a range of private media assessment organizations, which span the ideological spectrum from Common Sense Media (progressive)<sup>28</sup> to PluggedIn (Christian conservative),<sup>29</sup> have emerged to assist parents. Does the spot check process consider the known concerns among parents about specific programs? Does it take into account the assessments of external media groups, as an additional way of evaluating the effectiveness of the TV ratings system? And if not, why not?
- The spot checks reportedly identify “discrepancies” in ratings, but it is unclear whether this means a discrepancy from program to program in how a particular rating is applied. Or does it mean that there is a discrepancy between the actual content of the show and the rating given? This process lacks transparency and deserves additional scrutiny.
- “Spot checks” are only as good as the ratings categories themselves. If the ratings categorically fail to provide parents with the information they seek—for example, by failing to identify “LGBTQ/gender identity” content—then the consistency of ratings across existing categories is a benchmark without meaning. (Concerns about the adequacy and accuracy of the ratings categories are addressed elsewhere in this document.)
- The Report’s conclusion that the 2025 spot checks “reflected the strength and consistency of the ratings system, with just two instances requiring rating changes,” does not inspire confidence in the thoroughness, relevance, or objectivity of the spot checks, or the Board itself. It suggests instead that reviewers operate in an echo chamber, with little meaningful input from parents outside the Board’s ecosystem.

## **2. The dearth of ratings complaints to the Board is not a mark of success.**

The 2025 Annual Report notes that over an *entire year*, the Board received 170 public comments, of which *only 11 comments* concerned the TV parental ratings.<sup>30</sup> Although the Board

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<sup>27</sup> GLAAD is an LGBTQ advocacy organization that works “with the television, film, and video game industries to ensure casting reflects the new realities of this generation, and that LGBTQ character presence is authentic.” <https://glaad.org/institute/>. “As a dynamic media force, GLAAD ensures fair, accurate, and inclusive representation that rewrites the script for LGBTQ acceptance.” <https://glaad.org/about/>

<sup>28</sup> Common Sense Media, *TV*, <https://www.common Sense Media.org/reviews/category/tv>.

<sup>29</sup> PluggedIn, *TV*, <https://www.pluggedin.com/tv/>.

<sup>30</sup> *Annual Report 2025* at 7.

considers it a “core responsibility” to manage and respond to complaints about the TV ratings,<sup>31</sup> it is remarkably incurious as to why it receives so few complaints about the TV ratings.

The Board presumes that the lack of complaints from parents must mean that it is doing a remarkably good job. But that is ludicrous. It is far more likely that these paltry numbers show that the Board is isolated from parents’ everyday concerns and is not doing nearly enough to reach out to parents and solicit their honest feedback. The low number of complaints suggests that few parents know to whom or how to make their objections or concerns known. Or, it may reflect some parents’ sense that complaints would be futile, given that—as shown above—the Monitoring Board almost exclusively comprises industry insiders and progressive advocacy groups.

If the Board were curious about whether parents are truly happy with the TV ratings system, the truth isn’t hard to find. A simple perusal of social media, parenting columns on Substack, and watchdog reports shows that parents are quite unhappy, and sometimes outraged, at the lack of or inaccuracy of TV content information.<sup>32</sup> Public officials have registered their discontent with the ratings system for years.<sup>33</sup>

The Board’s complacency over the miniscule feedback it receives from American parents raises important questions for the FCC to raise with the Monitoring Board:

- Does the Board invite parental feedback? And if so, through what channels?
- Does the Board actively seek to determine the utility and accuracy of its ratings? If so, how does it make that assessment? Does it engage with watchdog groups or monitor social media to get a better sense of parents’ honest reactions?
- Over the past five years, exactly what was the nature of the content complaints received by the Board and how were those complaints resolved? Has there been any adjustment in how the ratings are understood and applied?

### **3. The Board’s high “parental satisfaction” scores are not credible and are inconsistent with other researchers’ findings.**

The Board reports the results of biannual surveys that purportedly find high rates of parental satisfaction with the TV Ratings. For example, the Board’s 2024 Annual Report claims

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<sup>31</sup> *Id.*

<sup>32</sup> See, e.g., Libs of TikTok, X (Apr. 7, 2025, 11:20 AM) (criticizing a Disney program “Dying for Sex”) <https://x.com/libsoftiktok/status/1909280199213990064>; see also Jess Colopy, *Conservative Parents Outraged After Disney+ Advertises “Sex” Show to Kids*, Disney Dining (April 10, 2025), <https://www.disneydining.com/disney-plus-dying-for-sex-libs-of-tiktok-jc1/>.

<sup>33</sup> See, e.g., Roger Marshall, X (May 19, 2026, 1:03 PM), <https://x.com/RogerMarshallMD/status/2056768534970081637> (“In 2022, I wrote to the TV Parental Guidelines Board because parents were being left in the dark about radical transgender content showing up in kids’ programming.”).

that “96% of parents are near unanimous in reporting satisfaction with the accuracy of the TV Parental Guidelines ratings system.”<sup>34</sup> That statistic is simply not credible.

The Board provides no information about its survey sample, beyond the statement that Hart Research conducted a “national online survey among 1,062 parents of children age two to 17” in September 2024. No indication is given about how the sample was chosen, the qualifying (or disqualifying) criteria for inclusion in the sample, and whether (or the degree to which) the respondents were representative (or not) of average parents, or parents from particular demographic groups (race, religion, geographic location, etc.).

For several decades, watchdog groups and several studies have demonstrated parental concerns over children’s exposure to specific kinds of content across a variety of channels, including classroom curricula, TV programming, social media, video games or elsewhere.<sup>35</sup> Parents want to be informed of the nature of the content to which their children are exposed, regardless of the source or delivery platform. Given the externally documented failures of the TV ratings systems (including the list of ratings failures identified in the following section), it is simply untenable for the Board to maintain that 96% of parents are satisfied with the accuracy of the ratings system.

It is problematic that the Board—which bears responsibility for ensuring parents have the information they need to make media decisions that fit their families—appears to have no interest in examining relevant research or in seriously seeking or responding to parental feedback on media content in children’s programming.

It is not possible here to do a thorough review of the research landscape concerning parents’ views of media content for children. Recent research has focused heavily on the effects of *time* spent on media, but less research has emerged regarding the *effects* on children of viewing certain *kinds* of content, specifically “LGBTQ” / “gender identity” content. A serious effort to empower parents might begin by considering the following relevant research:

- A 2026 study of parental views towards the inclusion of “LGB” topics in sex education programs indicates parental objection to “LGB” content transcends students ages and pertains to the content itself. Parents give little weight to assurances that material is “age-appropriate.”<sup>36</sup>
- A 2021 law review article concerned with TV ratings and tobacco use found “numerous deficiencies” in the TV parental guidelines, including a failure to adequately research the

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<sup>34</sup> TV Parental Guidelines Monitoring Board, *Annual Report 2024*  
[https://www.tvguidelines.org/resources/TV\\_Parental\\_Guidelines\\_2024AnnualReport.pdf](https://www.tvguidelines.org/resources/TV_Parental_Guidelines_2024AnnualReport.pdf).

<sup>35</sup> Risa Gelles-Watnick, *Explicit Content, Time-Wasting Are Key Social Media Worries for Parents of U.S. Teens*, Pew Research Center (Dec. 15, 2022), <https://www.pewresearch.org/short-reads/2022/12/15/explicit-content-time-wasting-are-key-social-media-worries-for-parents-of-u-s-teens/>.

<sup>36</sup> Tania Ravaei, *Student Age, Inclusion of LGB Topics, and Specifying Appropriateness on Support for Sex Education in the United States: Results From a National Survey Experiment*, 2 *Sex & Sexualities* (2026), <https://journals.sagepub.com/doi/epub/10.1177/30333717261416944>.

accuracy of the ratings system.<sup>37</sup>

- A 2016 study of television ratings assessing violent content found that “TV Parental Guidelines ratings were ineffective in discriminating shows for 3 out of 4 behaviors studied.”<sup>38</sup> In other words, the ratings were not accurately describing the content.
- A 2011 report co-authored by EPPC scholar Mary Hasson and published in *Pediatrics* assessed parents’ views of the TV ratings system across three separate studies.<sup>39</sup> The researchers found that parents preferred content descriptors to age labels. Parents sought greater detail about the content in children’s programming, including information about dialogue, characters, and themes related to “alternative lifestyles” (“LGBTQ” content).

**B. The current TV ratings system does not adequately warn parents about LGBTQ themes and pro-gender ideology content.**

The FCC Notice observes that “[r]ecently, parents have raised concerns that controversial “gender identity” issues are being included or promoted in children’s programs without providing any disclosure or transparency to parents.”<sup>40</sup> The FCC therefore asks in the Notice:

Do descriptions of the content provide a sufficient basis for parents to make informed decisions concerning viewing decisions for their family, including when gender identity themes are discussed or displayed? Are parents aware that children watching programs rated TV–Y, TV–Y7, and TV–G may contain the discussion or promotion of gender identity themes? Should such programming be rated differently or contain relevant descriptions so that parents can make informed decisions?<sup>41</sup>

We do not think the current system is sufficient to help parents make informed decisions about what their children can watch.

As noted above, in *Mahmoud v. Taylor*, the Supreme Court held that parents have the right to be notified of and opt their children out of “LGBTQ” storybooks in the public school curriculum.<sup>42</sup> Although *Mahmoud* discussed parents’ rights in the school context, the Court’s observations in *Mahmoud* about why parents were so concerned about “LGBTQ” content in schools apply equally to parents’ concerns over children’s TV programming. Like the problematic LGBTQ storybooks in *Mahmoud*, television programming that presents LGBTQ

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<sup>37</sup> Courtney Leavitt, *Tobacco and the Small Screen: Why the TVOMB Should Restructure the Parental Guidelines*, 55 *Hastings Comm. & Ent. L.J.* 119 (2021), [https://repository.uclawsf.edu/hastings\\_comm\\_ent\\_law\\_journal/vol44/iss1/5/](https://repository.uclawsf.edu/hastings_comm_ent_law_journal/vol44/iss1/5/).

<sup>38</sup> Joy Gabrielli et al., *Industry Television Ratings for Violence, Sex, and Substance Use*, 238 *Pediatrics* e20160487 (2016), <https://pubmed.ncbi.nlm.nih.gov/27550985/>.

<sup>39</sup> Douglas Gentile et al., *Parents’ Evaluation of Media Ratings a Decade After the Television Ratings Were Introduced*, 128 *Pediatrics* 36 (2011), <https://publications.aap.org/pediatrics/article-abstract/128/1/36/30359/Parents-Evaluation-of-Media-Ratings-a-Decade-After?redirectedFrom=fulltext>.

<sup>40</sup> 91 Fed. Reg. at 23991.

<sup>41</sup> *Id.* at 23992.

<sup>42</sup> 606 U.S. 522 (2025).

content (broadly understood) as “unmistakably normative” poses a direct challenge to many parents’ religious, moral, and prudential concerns.<sup>43</sup> Parents have a right to know when such controversial content is embedded in children’s programming. Put differently, when the content of children’s programming “present[s] certain values and beliefs as things to be celebrated, and certain contrary values and beliefs as things to be rejected,” *in contradiction to parents’ beliefs and values*, then parents have a right to meaningful warnings about that content.<sup>44</sup>

With these concerns in mind, an EPPC scholar reviewed a sampling of children’s programming, listed below, that had been identified (in show notes, news articles, or by media watchdogs) as including LGBTQ themes and gender ideology content. The scholar verified the controversial content and lack of appropriate content labeling for this sampling, noting content that included any of the following: portrayal of characters who identify as “gay,” “lesbian,” “bisexual,” “transgender” (including “non-binary”), or “queer”; themes related to sex rejection, identity distress (‘gender dysphoria’), or social or medical “transition”; or LGBTQ themes such as “coming out,” same-sex attraction and behavior, and same-sex “marriage.”

The reviewed episodes, across network, cable and streaming platforms, all included content promoting LGBTQ themes and pro-gender ideology content. Nearly all the reviewed episodes received a TV-Y or TV-G rating, indicating (erroneously) that the episodes were suitable for very young children. None of the episodes offered any detailed information about the content, and none indicated the inclusion of such content. The few episodes that received a TV-Y7, TV-Y7+ or PG rating were classified as such because of *other* thematic elements such as fantasy violence but contained no information to inform viewers that the content promoted LGBTQ themes or pro-gender ideology content.

Consider the following examples from the scholar’s review<sup>45</sup>:

- ***Blue’s Clues and You!*** is a series aimed at preschoolers that aired on Nickelodeon from 2019 through 2025.<sup>46</sup> In 2021, *Blue’s Clues and You!* released a short episode titled “The Pride Parade Sing-Along” to its *YouTube* channel. This episode features drag queen Nina West emceeding a “pride parade” that included families with same-sex couples and characters who presented as “non-binary” or “transgender,” including one character with visible double mastectomy scars. The episode has no visible rating and contains no warning that it promotes gender ideology—including normalizing double mastectomies on minors, to young children.
- ***Cocomelon Lane*** (Netflix) is a series aimed at preschoolers. In 2023, it released an episode (Season 1, episode 8) titled “Say Cheese Nico.” In this episode, one character, Nico, is a boy with two “dads,” who tries on various outfits as he decides what to wear

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<sup>43</sup> *Id.* at 550.

<sup>44</sup> *Id.*

<sup>45</sup> Additional information on programs or series reviewed by an EPPC scholar is available here: <https://media.eppc.org/2026/05/TV-Shows-Movies-with-LGBTQ-Content.pdf>.

<sup>46</sup> Jessica Pena, *Blue’s Clues & You: Premiere Date Set for Nickelodeon Reboot, Original Hosts Return* (Aug. 26, 2019), <https://tvseriesfinale.com/tv-show/blues-clues-you-premiere-date-set-for-nickelodeon-reboot-original-hosts-return/>.

for a family photo. When the men remind Nico that he likes to dance, Nico appears dressed in a tutu and tiara, against a rainbow wall of music notes as a background, and spins around for the men as they sing “just be you.” Nico declares that he feels like himself when he finally appears with multiple hats and the tiara. This episode has no content warnings and is rated TV-Y.

- The series *Arthur* (PBS kids, PBS website) is aimed at young children (K through early elementary). In 2019, an episode titled “Mr. Ratburn and the Special Someone,” shows the male third-grade teacher getting “married” to a man, with the children from his class attending. This episode carries a TV-Y Rating with no content warning, even though Alabama public television refused to air it because of the same-sex “wedding.”
- *The Bravest Knight* is a Canadian series that airs on Hulu and is aimed at young children (K-early elementary). The Bravest Knight features a male knight and his “husband” Prince Andrew as the main characters in every episode. The two men also have an adopted daughter. The show is rated TV-PG and has no content warnings.
- *Muppet Babies* (Reboot) (Disney Junior, also found on Disney Plus) is a series for preschoolers. Season 3 features an episode titled “Gonzo-rella” (2021-22). In this episode, Gonzo becomes upset at being described as one of the boys/princes. He declares he wants to wear the Cinderella gown to the ball and is crushed when told boys don’t wear dresses and is unconvinced when other boys say they’ll have a great time being knights. Gonzo’s “fairy Rat-father” gives him the perfect dress to wear to the ball and helps him transform himself to look like a princess. Gonzo declares that it makes him “so happy” to wear a dress and successfully passes himself off as a “princess.” Afterwards, Gonzo reveals to his friends that he is the mysterious “princess.” The episode presents identity distress and “social transition” with no content warning. It is rated TV-Y.
- *Ridley Jones*, a series for preschoolers (Netflix, premiered in 2021), is about a girl who lives at a museum. Her friends include a non-binary bison and a mummy girl (who has two mom-mummies). When Ridley meets the bison she asks a friend if the bison is “a he or a she,” and the friend replies, “I don’t know, they’re just Fred.”<sup>47</sup> Ridley Jones is rated TV-Y and no content warnings are listed.
- **Other TV shows**, particularly those geared towards young adolescents, include themes of “coming out” as “gay,” or feature “transgender” and “non-binary” teens, couples, or parents.<sup>48</sup> Many shows, including hit series like Sesame Street and shows for all age groups, feature same-sex parents.<sup>49</sup> For example, same-sex parents appear on *Doc McStuffins*, and *Rubble and Crew* (A *Paw Patrol* spin-off) features a non-binary character who is decked in the colors of the transgender flag. *Star vs. the Forces of Evil* features a same-sex kiss. No shows carry content warnings to warn parents of the content.

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<sup>47</sup> Mombian, *Watch: New Netflix Kids’ Show “Ridley Jones” Includes Nonbinary Bison and Two-Dad Mummy Family* (June 21, 2021), <https://mombian.com/2021/06/21/watch-new-netflix-kids-show-ridley-jones-includes-nonbinary-bison-and-two-dad-mummy-family/>.

<sup>48</sup> Common Sense Media, *TV Shows with LGBTQ+ Characters and Leads* (last updated Mar. 26, 2026), <https://www.commonsensemedia.org/lists/tv-shows-with-lgbtq-characters-and-leads>.

<sup>49</sup> Mombian, *Watch: Sesame Street Episode Introduces Two-Dad Couple and Daughter* (June 18, 2021), <https://mombian.com/2021/06/18/watch-sesame-street-episode-introduces-two-dad-couple-dads-and-daughter/>.

The portrayal of sexuality and “gender identity” is a natural concern for parents, reflecting parents’ deeply held beliefs about the human person and their responsibility for their children’s formation and upbringing. Some parents may seek out programming that promotes gender ideology, while others may wish to avoid it. The FCC rating system recognizes that it is a parent’s prerogative to exercise oversight and make decisions concerning the media that their children consume. Given the intentional infusion of LGBTQ themes and pro-gender ideology content into shows aimed at even the youngest children, parents should be empowered to make the decisions that are right for their families—but this requires that they receive accurate information to inform their decisions. The current ratings system fails to provide parents with the information they need and therefore does not accomplish the goals Congress identified in passing the Telecommunications Act of 1996.

**C. Technology makes it feasible for the Monitoring Board to do a much better job addressing these concerns.**

Because of the many content-screening technologies available, expanding ratings—including adding additional content descriptors, such as one for LGBTQ content—would not be burdensome.

One widely used method of automatically tagging content is multimodal artificial intelligence. Multimodal AI combines video, language, and acoustic analysis capabilities to detect specific types of content included in a video.<sup>50</sup> It can be directed to detect many kinds of content, and could be used to flag transgender identity portrayal or same-sex romantic behavior. AI video analysis works frame by frame to detect inappropriate scenes or graphic content. It is used by social media platforms like Instagram, YouTube, and TikTok to identify and remove videos that violate their policies.<sup>51</sup> Language analysis begins with automatic speech recognition (ASR) that converts spoken language into written text; then, natural language processing (NLP) analyzes the text, identifying and classifying the content of the speech.<sup>52</sup> ASR and NLP are used for live captioning, Spotify podcast transcripts, Instagram voice captions, and more. Acoustic analysis flags changes in audio, even if there is no dialogue, to pick up on cues for inappropriate content, such as screaming, explosions, or sexual noises.<sup>53</sup>

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<sup>50</sup> Milvus, *How Is Multimodal AI Used in Video Analysis?*, Milvus AI Quick Reference, <https://milvus.io/ai-quick-reference/how-is-multimodal-ai-used-in-video-analysis>; Ahmed et al., *Enhanced Multimodal Content Moderation of Children’s Videos Using Audiovisual Fusion*, 37 Int’l FLAIRS Conf. Proceedings (2024).

<sup>51</sup> YouTube, “Building Greater Transparency and Accountability with the Violative View Rate,” YouTube Blog, April 6, 2021, <https://blog.youtube/inside-youtube/building-greater-transparency-and-accountability/>; TikTok, “Community Guidelines Overview” TikTok Safety / Community Guidelines, <https://www.tiktok.com/safety/en/policies-and-engagement/overview?cgversion=2025H2update>.

<sup>52</sup> Ethical Speech Detection And Safeguarding In Realtime Audio Systems For Safety Applications. (2026). *International Journal of Engineering and Science Research*, 16(2), 28-33. <https://ijesr.org/index.php/ijesr/article/view/1578>.

<sup>53</sup> Bonet-Solà, D., & Alsina-Pagès, R. M. (2021). A Comparative Survey of Feature Extraction and Machine Learning Methods in Diverse Acoustic Environments. *Sensors (Basel, Switzerland)*, 21(4), 1274. <https://doi.org/10.3390/s21041274>.

Many companies sell AI systems for automated content tagging that can generate time-stamped reports and classify content categories scene by scene. Again, these systems can be tailored to flag many types of content, more broadly than just language, violence, and sex. Automated content tagging is also used by large companies like Amazon Technologies, which received a patent for an automated maturity rating system that bundles AI video analysis with ASR and NLP.<sup>54</sup> This system is designed to generate more specific ratings for episodes, rather than relying on a blanket rating for shows or seasons.

Large entertainment companies like Netflix, Max, and Amazon also use metadata tagging capabilities to classify their content and power recommendation algorithms.<sup>55</sup> Metadata tagging goes far beyond broad genre labels and can include things like mood, pacing, tone, narrative structure, visual intensity, and dialogue density. Some streaming platforms already include metadata tags for LGBT-related content so that they can recommend it to interested viewers. The infrastructure to rate each episode based on a range of content tags already exists, so it is technologically feasible to explore an expansion of ratings frameworks.

### III. These recommendations align with Trump Administration priorities.

The recommendations outlined in this public comment—diversifying the Monitoring Board to include parents, faith leaders, and religious media, and adding content ratings to recognize LGBTQ themes and pro-gender ideology content—align with Trump Administration Priorities. Since Day 1, President Trump and his administration have taken bold actions to protect parental rights,<sup>56</sup> protect children,<sup>57</sup> fight gender ideology,<sup>58</sup> and promote religious

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<sup>54</sup> Emily Evon McAninly et al., *Automated Video Ratings*, U.S. Patent No. 10,643,074 B1 (filed May 5, 2020; issued May 5, 2020), assigned to Amazon Technologies, Inc., <https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/10643074>.

<sup>55</sup> Carlos A. Gomez-Urbe and Neil Hunt, *The Netflix Recommender System: Algorithms, Business Value, and Innovation*, 6 ACM Trans. Manage. Inf. Syst., Article 13 (2015). <http://dx.doi.org/10.1145/2843948>.

<sup>56</sup> See, e.g., White House, *President Trump's Top 100 Victories for People of Faith* (Sept. 8, 2025), <https://www.whitehouse.gov/releases/2025/09/president-trumps-top-100-victories-for-people-of-faith/> (highlighting ways President Trump has protected parental rights); Brief of United States, *Mahmoud v. Taylor*, 606 U.S. 522 (2025), No. 24-297, [https://www.supremecourt.gov/DocketPDF/24/24-297/351678/20250310164956381\\_24-297\\_tsacUnitedStates.pdf](https://www.supremecourt.gov/DocketPDF/24/24-297/351678/20250310164956381_24-297_tsacUnitedStates.pdf); Press Release, ACF Defends Biological Reality and Parental Rights in Letter to All 50 States (Mar. 3, 2026), <https://acf.gov/media/press/2026/acf-defends-biological-reality-parental-rights-letter-50-states> (letter available at <https://media.eppc.org/2026/03/ACF-CAPTA-Letter.pdf>).

<sup>57</sup> See, e.g., White House, *President Trump is Delivering on His Commitment to Protect Our Kids* (Feb. 3, 2025), <https://www.whitehouse.gov/articles/2025/02/president-trump-is-delivering-on-his-commitment-to-protect-our-kids/>.

<sup>58</sup> See, e.g., Exec. Order 14168, *Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*, 90 Fed. Reg. 8615 (Jan. 20, 2025), <https://www.federalregister.gov/d/2025-02090>; Exec. Order 14187, *Protecting Children From Chemical and Surgical Mutilation*, 90 Fed. Reg. 8771 (Jan. 28, 2025), <https://www.federalregister.gov/d/2025-02194>; Exec. Order 14190, *Keeping Men Out of Women's Sports*, 90 Fed. Reg. 9279 (Feb. 5, 2025), <https://www.federalregister.gov/d/2025-02513>; Press Release, DOJ, *The Department of Justice Proposes Legislation to Protect Children from Gender Mutilation*, <https://www.justice.gov/opa/pr/department-justice-proposes-legislationprotect-children-gender-mutilation> (proposing “Victims of Chemical or Surgical Mutilation Act”).

liberty.<sup>59</sup> We urge the FCC to similarly take the bold actions proposed in the notice and in this comment to further these important priorities and empower parents to protect their children.

## CONCLUSION

Thank you for the opportunity to provide public comment. We hope that these recommendations will help the FCC reform the ratings systems so that does a better job of empowering parents and protecting children.

Sincerely,

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<sup>59</sup> See, e.g., Exec. Order 14188, Additional Measures to Combat Anti-Semitism (Jan. 29, 2025), <https://www.federalregister.gov/d/2025-02230>; Exec. Order 14190, Eradicating Anti-Christian Bias, 90 Fed. Reg. 9365 (Feb. 6, 2025), <https://www.federalregister.gov/d/2025-02611>; Exec. Order 14205, Establishment of the White House Faith Office, 90 Fed. Reg. 9499 (Feb. 12, 2025), <https://www.federalregister.gov/d/2025-02635>; DOJ, Eradicating Anti-Christian Bias within the Federal Government (Apr. 30, 2026), <https://www.justice.gov/opa/media/1438506/dl?inline>; Press Release, EEOC, *200 Days of EEOC Action to Protect Religious Freedom at Work* (Aug. 22, 2025), <https://www.eeoc.gov/newsroom/200-days-eeoc-action-protect-religious-freedom-work>.