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Tobacco Control Policy Making: United States

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Publication Date

2020-04-01

WHAT IS HOLLYWOOD HIDING?

How the entertainment industry
downplays the danger to kids
from smoking on screen

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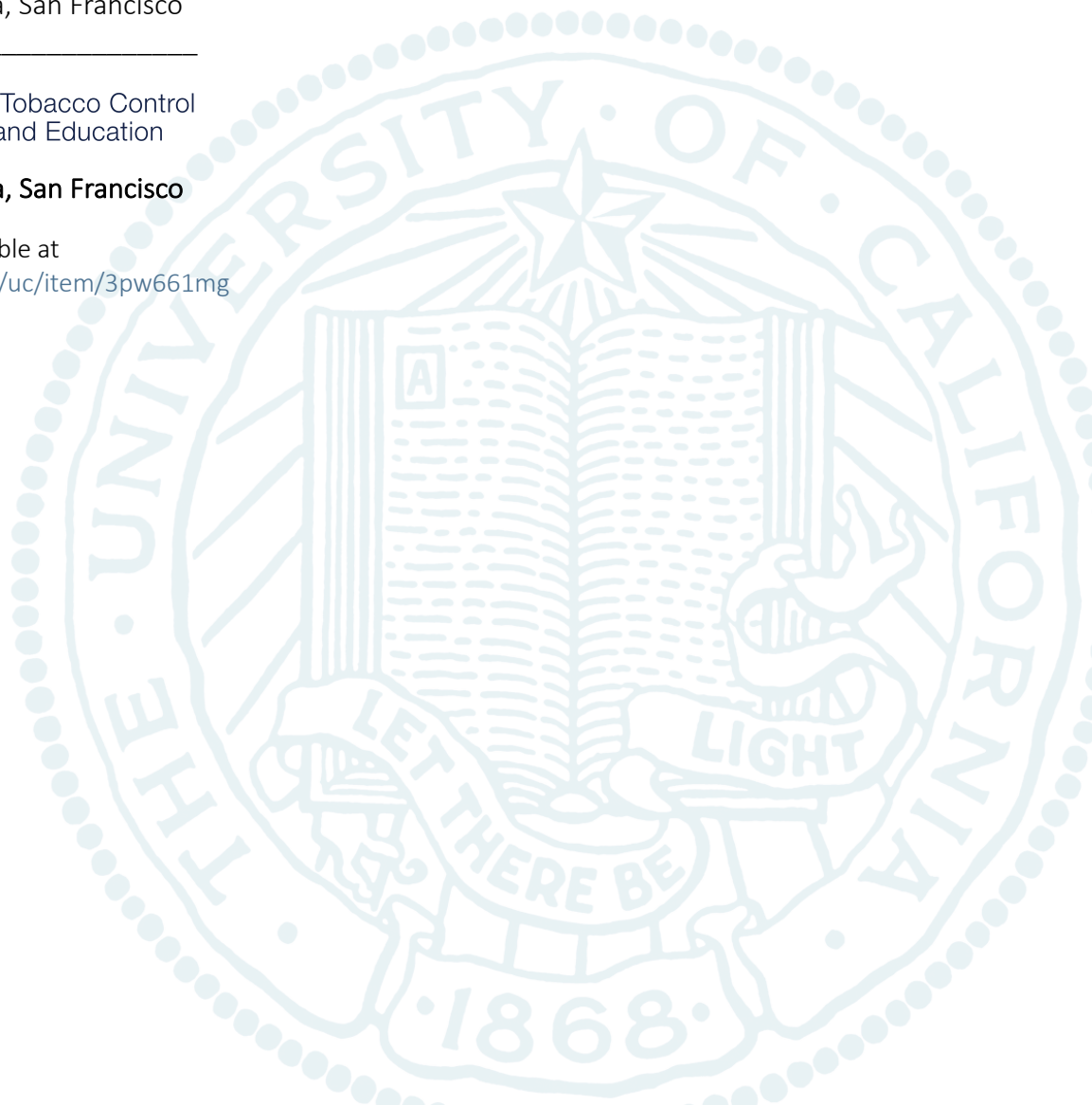
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This publication is available at
<https://escholarship.org/uc/item/3pw661mg>

April 2020



EXECUTIVE SUMMARY

- The U.S. Surgeon General has concluded that exposure to onscreen tobacco imagery causes young people to smoke. The U.S. CDC has projected that this exposure will recruit more than six million new young smokers in the U.S. in this generation, of whom two million will die from tobacco-induced diseases.
- More than half of U.S. top-grossing films released since 2002 include smoking,¹ including 51 percent of films in 2019. The number of tobacco incidents in youth-rated films has grown by 63% since 2015.
- By 2019, three-quarters of U.S. households subscribed to at least one video-in-demand (VOD) channel. Films comprise the majority of the titles offered on popular video-on-demand (VOD) services, while TV series account for the majority of programming hours they offer.
- Per capita, in 2019 films were viewed fourteen times more on digital media than in theaters.

Advance notice to parents

- Neither the Motion Picture Association (MPA) nor TV Parental Guidelines (TVPG) treat tobacco as an explicit rating factor. The MPA only applies its bland “smoking” descriptors to 13 percent of top-grossing youth-rated films with tobacco content.
- A survey of nine popular VOD services finds that three VOD services do not display film and TV ratings reasons with their video content and six other VOD services show ratings reasons only after the user selects a film or TV show and the video is rolling.
- Two VOD services that add their own tobacco content notifications to some of their videos show them only after the user selects a film or TV show and the video is rolling.
- None of the nine VOD services surveyed informs users that smoking on screen harms young viewers.

Weak parental controls

- None of the VOD service offers parental controls on their landing pages; instead, multiple steps are required to reach the controls.
- Within the controls, six of the nine VOD services do not reference MPA or TVPG ratings when parents set restrictions.
- Three of the services allow young viewers to bypass controls by selecting an existing, unrestricted user profile without entering a password or PIN.
- Six of the services require parents to remember and use a PIN number to bypass account-wide restrictions, which may discourage the sustained use of parental controls. How many households with children try out or consistently use parental controls is not public data.

Recommendation

- Policy makers must continue to focus on substantially reducing tobacco content in films and TV programs produced in the future that are accessible to young viewers, and on the marketing of existing films and TV programs with smoking in a way that substantially reduces youth exposure to tobacco content.

¹ For the purposes of this report: “Smoking,” “tobacco content” or “tobacco imagery” include the visual display, audio reference, or other representation of smoking, vaping, or the use of any tobacco or nicotine product and the display or reference to an object that appears to be or promotes a tobacco or nicotine product. “Objects” include combustible tobacco products, vaping (e-cigarettes) or heat-not-burn devices or accessories, packaging, billboards, posters, advertisements, commercials, cartoons, or any other representations.

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INTRODUCTION | SHIFTS IN ONSCREEN TOBACCO RISK

There is worldwide scientific consensus that exposing young audiences to onscreen tobacco imagery causes millions of adolescents to start using tobacco. Article 13 of the WHO Framework Convention on Tobacco Control, with 181 national and other parties representing ninety percent of the world's population, obligates governments to stop tobacco promotion in entertainment media, including film and video.²

Documents gathered through lawsuits show that the U.S. tobacco industry began exploiting motion pictures to promote smoking by 1927, running cross-promotion campaigns that involved top Hollywood stars, directors, and major film studios into the 1950s.³ Tobacco companies took the lead in TV sponsorship and advertising from the 1950s through 1970, the year the U.S. Congress barred tobacco advertising on broadcast media. Tobacco companies then launched systematic product placement initiatives from the 1970s onward that ensured brand display and smoking in hundreds of U.S. films — 40 percent youth-rated — into at least the 1990s.^{4,5}

Tobacco depictions in films and on video, including overt tobacco brand display, persist in U.S.-produced entertainment products distributed globally. In 2016, the U.S. Centers for Disease Control and Prevention (CDC) projected that exposure to onscreen smoking in motion pictures alone will recruit more than six million of the current generation of U.S. children and teens to use tobacco products, among whom more than two million will ultimately die from tobacco-induced diseases.⁶

The migration of smoking on screen

The Breathe California-UCSF Onscreen Tobacco Database has tracked tobacco content in top-grossing U.S. theatrical films since 2002. Analysis shows that, from 2002 to 2019, 1,436 films featured a total of 50,684 tobacco incidents and delivered 371 billion tobacco impressions⁷ to U.S. movie-goers of all ages. Fifty-two percent of these films with smoking have been youth-rated G, PG or PG-13 (41% in 2019).⁸

In 2014, the U.S. Surgeon General estimated that the U.S. teen smoking rate could be cut by 18 percent if smoking were effectively eliminated from future youth-rated films.⁹ This amounts to about half of the estimated 37 percent of new young smokers estimated to be recruited by exposure to smoking in both youth-rated and R-rated films.

The annual number of youth-rated films with any smoking declined by nine percent from 2015 to 2019. However, the number of tobacco incidents in youth-rated films actually increased over these

² World Health Organization (2008). Guidelines for implementation of Article 13 of the WHO Framework Convention on Tobacco Control (Tobacco advertising, promotion and sponsorship). Accessed 3/27/20 at https://www.who.int/fctc/guidelines/adopted/article_13/en/.

³ Lum KL et al (2008). Signed, sealed and delivered: "Big Tobacco" in Hollywood, 1927-1951. *Tobacco Control* 2008 Oct;17(5):313-23. Accessed 3/27/20 at <https://www.ncbi.nlm.nih.gov/pubmed/18818225>.

⁴ Mekemson C, Glantz SA (2002). How the tobacco industry built its relationship with Hollywood. *Tobacco Control* 2002;11(Suppl 1):i81-i91. Accessed 3/27/20 at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1766059/pdf/v011p00i81.pdf>.

⁵ Polansky JR, Glantz SA (2016). Tobacco product placement and its reporting to the Federal Trade Commission. UCSF Center for Tobacco Control Research and Education. Accessed 3/27/20 at <https://escholarship.org/uc/item/7kd981j3>.

⁶ U.S. Centers for Disease Control and Prevention (2016). Smoking in the movies (fact sheet). Accessed 3/27/20 in its archived form: <https://smokefreemovies.ucsf.edu/sites/smokefreemovies.ucsf.edu/files/CDC%20-%20Fact%20Sheet%20-%202015.pdf>.

⁷ One impression is one person seeing one onscreen tobacco incident.

⁸ Breathe California-UCSF Onscreen Tobacco Database (OTDb), accessible at <https://smokefreemovies.ucsf.edu/>.

⁹ U.S. Department of Health and Human Services (2014). The health consequences of smoking—50 years of progress: A report of the Surgeon General. Accessed at 3/21/20 at https://www.ncbi.nlm.nih.gov/books/NBK179276/pdf/Bookshelf_NBK179276.pdf (Chap. 14, pp. 775-77).

years — by 63 percent — and in-theater tobacco impressions¹⁰ delivered by youth-rated films grew by 51% (from 2.9 billion to 4.3 billion), according to the Onscreen Tobacco Database

Researchers have consistently observed that adolescents in the U.S. and worldwide receive substantial tobacco exposure from U.S. adult-rated (“R”) films.¹¹ (Many U.S. R-rated films are rated for youth outside the U.S.¹²) R-rated films, which have not been the focus of public health policy advocacy, saw much larger increases in tobacco content than did youth-rated films from 2015 to 2019. While the number of R-rated films with any smoking increased by eleven percent from 2015 to 2019, the total number of tobacco incidents in R-rated films more than doubled (from 1,136 to 2,631 incidents) and tobacco impressions delivered by R-rated films tripled (from 6.4 billion to 19.4 billion). Depending on the relative youth viewership of youth-rated and R-rated films, the share of tobacco exposure received by adolescents that comes from youth-rated films and the share from R-rated films may be shifting, with a smaller amount coming from youth-rated films and a larger amount from R-rated films.

With tobacco imagery migrating from youth-rated to R-rated films and viewership increasing on video-on-demand (VOD) services lacking effective age-gates, it is difficult to know if kids are getting more or less total tobacco exposure from films — in absolute terms — than they did in the early 2000s. Determining actual youth exposure to onscreen smoking requires knowing the amount of smoking in individual films *and* TV shows as well as the number of young people watching each film and TV show on all screens.¹³

The migrating media audience

Movie theaters in the U.S. and Canada (what the U.S. film industry calls its “domestic market”) sold 1.2 billion tickets to top-grossing films in 2019. This represents a 31 percent decline, per capita, from two decades ago and a 21 percent drop in paid admissions in absolute terms. PG-13 films in theaters have taken the biggest hit, losing 28 percent of their audience between 2015 and 2019 (699 million to 506 million annual admissions) while R-rated films have held steady.¹⁴

Where have audiences gone? Younger audiences adopt new media platforms faster than older audiences. Teens 12-17 cut their traditional TV viewing in half between 2013 and 2018, from more than 21 hours per week to fewer than ten.¹⁵ Eighty-five percent of children and teens (ages 2-17) watched full-length films and TV shows on their phones in 2019, and half reported watching films on their phones daily or several times a week. Only 58 percent adults do so at all, and only 20 percent do so as often.¹⁶

¹⁰ Tobacco impressions are calculated as paid admissions to a film X tobacco incidents in a film. They do not include exposures from viewing the movie on home media, as those per-title audience counts are not consistently available.

¹¹ A survey of 6,500+ U.S. 10-14-year-olds found they received 39% of their onscreen tobacco exposure from R-rated films, with R-rated exposure increasing by age. Sargent JD, Tanski S et al (2006). Reach of movie smoking among U.S. adolescents. Fifth AACR Int’l Conf. on Frontiers in Cancer Prevention Research. Accessed 3/27/20 at https://cebp.aacrjournals.org/content/15/12_Supplement/B52.

¹² Eighty-five percent of films with smoking seen by adolescents in Europe were youth-rated, compared to 59% in the U.S., because films R-rated films in the U.S. are often youth-rated in other markets. Hanewinkel R, Sargent JD, Karlsdóttir S et al (2013). High youth access to movies that contain smoking in Europe compared with the USA. *Tobacco Control* 2013;22:241-244. Accessed 3/27/20 at <https://tobaccocontrol.bmj.com/content/22/4/241.full>.

¹³ Audience age composition data from the early 2000s showed that 12-17-year-olds comprised about 25% of the audience for both PG-13 and R-rated films in theaters. In 2019, U.S. Senators asked a dozen large media companies for audience-age data from 2015-18, but the companies did not provide it. [Request and replies](#).

¹⁴ Breathe California-UCSF Onscreen Tobacco Database. Year 2020 declines due to the coronavirus pandemic are not reflected in this analysis.

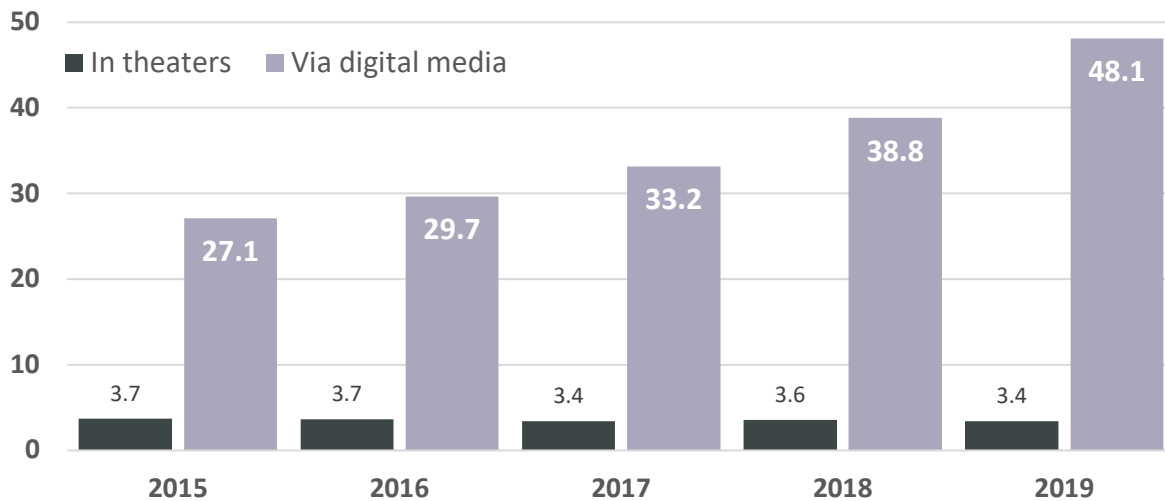
¹⁵ Lupis JS (2019). The state of traditional TV: Updated with Q3 2018 data. Marketing Charts. Accessed 3/27/20 at <https://www.marketingcharts.com/featured-105414>.

¹⁶ Motion Picture Association (2020). MPA THEME Report 2019. Accessed 3/27/20 at <https://www.motionpictures.org/wp-content/uploads/2020/03/MPA-THEME-2019.pdf>.

By 2019, three-quarters of U.S. households subscribed to at least one VOD channel¹⁷ (270 million households). Nearly half (46%) subscribed to more than one service, up from 20 percent in 2014.¹⁸ As of late 2019, nearly one-fifth (19%) of all hours watching TV were spent watching VOD services.¹⁹

The film industry's own statistics show that films are watched substantially more often online than in theaters and that the gap is widening. From 2015 to 2019, online movie transactions via subscription VOD services and other digital platforms grew by 82 percent (from 8.7 billion to 15.8 billion). In 2015, films were already viewed 7.3 more times online than in theaters; by 2019, they were being watched 14.2 times more often online (Figure 1).²⁰

Figure 1 | Film viewings in the U.S., per capita, in theaters and via digital media, 2015-2019



Adding to the attraction of on-demand viewing, the “release window” between when a film appears in theaters and when it is available on home video has shrunk: audiences in 2019 waited 12 weeks to see a hit movie at home, on average, compared to 24 weeks in 2002.²¹ Anywhere-anytime convenience and ostensibly lower prices (\$8-12 per month for unlimited home access to a single VOD platform vs. \$8-12 for a single ticket at a movie theater) draws audiences to VOD.

Incentives for the media companies

A company that owns a library of media content and its own VOD channel to sell it on no longer needs to license the content and negotiate a revenue split with another company, whether it is HBO, Amazon or AMC Theatres. The company that owns a film and TV library can load its own intellectual property into its own sleek direct-to-consumer interface, then build its subscriber base with each new “original” film or video series using classic marketing techniques. Another advantage for a media conglomerate owning its own VOD service? The company can harvest valuable data from tens of millions of households, including about their viewing and consumption habits, which benefits the conglomerate’s broader, multi-media marketing purposes.

¹⁷ Broadband TV News (2019). *Research: 74% of U.S. households have an SVOD service.*

¹⁸ Digital TV Europe (2019). *Multiple OTT subscriptions becoming the norm with 130% growth over five years.*

¹⁹ Q4 2019 data cited by Tech Crunch (2020). *Streaming accounts for nearly one-fifth of total U.S. TV watching, according to Nielsen.*

²⁰ Calculated from data in MPA THEME Report (2019), citing IHS Markit, at p. 38. TV show views online were up 150%.

²¹ National Association of Theatre Owners (2020). *Major studio release windows (DVD).*

Most of the major VOD platforms offer a mix of licensed and original programming. Licensed content may include “must-see” blockbusters but also more obscure titles, many never released to theaters, that are added to populate the site and convince members of its value proposition. Some VOD services position their brands as unique destinations by investing in production of costly “original” feature films and TV series. However, across all age groups 18-64, in 2019, viewers watched more licensed (56%) than original content (44%) and reported that they value access to a “wide variety of content” (73%) over access to “exclusive, original content (27%).²²

Attracting subscribers is expensive: one analyst reported that in 2017 Netflix spent \$100 to sign up each new U.S. account.²³ Retaining subscribers also requires care. The customer should feel that desirable choices are plentiful, but not feel overwhelmed. Like other e-commerce sites, VOD platforms use the concept of a “conversion funnel,” which narrows down the consumer’s choices, first among categories and then within a category, until the transaction is completed. Many services use algorithms to show subscribers a filtered set of titles similar to choices that they (or users like them) have made previously. With subscribers averaging more than seven minutes to make a selection,²⁴ each site’s user experience is finely tuned to avoid distractions, detours, or ungratifying visits that might cause the user to abandon the session or cancel the subscription. Companies’ incentive to retain subscribers and minimize membership turn-over will bear on later topics of this briefing: ratings display and parental controls.

Growth of video-on-demand channels raises three questions related to youth exposure to tobacco content

How does the shifting media environment affect audience risk from toxic tobacco content? There are three questions:

- How do VOD services handle content ratings and content notices?
- How do parental controls actually operate?
- What policies can best protect a new generation from the proven risks of tobacco-contaminated content?

1 | HOW THE ENTERTAINMENT INDUSTRY RATES ITSELF

The motion picture and TV industries maintain separate and distinct age-classification systems.

1.1 | MPA ratings for films

Theatrical feature-length films are rated in the United States by anonymous panels of parents recruited, trained, and managed by the Motion Picture Association (MPA).²⁵ The MPA ratings and their deployment follow published rules and procedures; violations are subject to sanctions on film distributors.²⁶

²² PwC (March 2019 data). [Streaming ahead: Making UX + content strategy work together](#). Because they are not competing for advertisers, subscription-based VOD services disclose viewer data at their own discretion. When they do report proprietary viewer data, it is commonly for their “original” programs,” not for licensed titles.

²³ Advanced Television (2018). [Analysis: Netflix spends \\$100 to get each U.S. sub.](#)

²⁴ Nielsen (Q1 2019). [Total audience report](#).

²⁵ 2017 revenue (2017): \$76.2 million; \$4.6 million from film rating service. Source: IRS [Form 990](#).

²⁶ See [Classification and Rating Rules](#) (2010) and [Advertising Administration Rules](#) (2019). The MPA appoints its own executives to oversee ratings and film advertising, but formally consults with the National Association of Theatre Owners (NATO) at least annually: theater management is the gatekeeper enforcing theatrical R and NC-17 admission restrictions.

The MPA's board of directors has six seats filled by major motion picture studios: AT&T's Warner Bros., Comcast's Universal, Disney (which acquired Twentieth Century Fox in 2019), Sony, ViacomCBS' Paramount, and Netflix (since 2019). Perhaps to reassure independent producer-distributors that the larger, MPA-member companies will not dominate the ratings process to the independents' disadvantage, the MPA formally manages the ratings through its Classification and Ratings Administration office (CARA). CARA is headed by an MPA senior vice-president appointed by the MPA's chairman, and the fees it charges producers or distributors to review and rate films are treated as MPA program revenue.

Another MPA office, the Advertising Administration, reviews film distributors' advertising materials to ensure that film ratings are displayed in accordance with MPA rules. Both offices offer an appeals process to film producers and distributors, with the MPA chairman making the final decision.

The MPA ratings were launched in 1968 to replace an industry-run censor board, the Hays Office, dating to 1930, whose enforcement powers had been hollowed out by a series of Supreme Court rulings.²⁷ According to its weekly ratings bulletins, the MPA routinely reviews and rates far more films than are widely released to U.S. theaters. The films that do not receive a wide theatrical release may be given a "limited release" at festivals or in a few cities, go straight to video, or never find a distributor at all. From 2008 to 2018, the MPA rated 7,746 films, of which only 1,538 (20%) were the wide-release, top-grossing films²⁸ that account for more than 95 percent of domestic movie tickets.²⁹

The MPA ratings have been revised six times since they were adopted in 1968.³⁰ The genesis of the PG-13 rating is credited to director Steven Spielberg, who reportedly proposed it after his PG-rated *Indiana Jones and the Temple of Doom* (Paramount, 1984) drew criticism for a grisly scene of human sacrifice.³¹ Otherwise, the film might have been re-rated R. In 1990, the NC-17 rating replaced the X rating, which the MPA had not copyrighted and the porn industry was exploiting.

Figure 2 | MPA rating blocks



Typical MPA rating block, before 2013 revision



Typical MPA rating block, after 2013 revision

In 2013, the MPA enlarged the font size of the "descriptors" (rating reasons) in its rating blocks (Figure 2). The revision came after the White House signaled, in the wake of the Sandy Hook shootings, that it

²⁷ Example: *Burstyn v. Wilson*, 343 U.S. 495 (1952), for the first time said that motion pictures had First Amendment protection.

²⁸ We define a "top grossing" film as one that was in the top 10 box office ticket sales for at least one week.

²⁹ MPA-rated film count: MPA ratings bulletins 2008-2018. Top-grossing film count: OTDb (definition at Note 14). Total domestic admissions: MPA statistical yearbooks 2014 (p.9) and 2018 (p.15). Top-grossing film admissions: OTDb, calculated as individual box office gross / NATO avg. ticket price in release year. MPA's 2019 statistics not available at the time of publication.

³⁰ 1968-70: G/M/R/X; 1970-72: G/GP/R/X; 1972-84: G/PG/R/X; 1984-90: G/PG/PG-13/R/X; 1990-96: G/PG/PG-13/R/NC-17 (descriptors, AKA rating reasons, added to R-rating block); 2000: Descriptors added to PG, PG-13, and NC-17 rating blocks; 2013: Descriptors enlarged in rating block.

³¹ Today.com (Comcast: NBCU, 2004). [PG-13 at 20: How "Indiana" remade films](#). Other studios quickly benefited from the PG-13 rating, which avoids the R-rating. Reports that an admired director proposed the PG-13 rating may be factual but also serve to skirt suspicions that major studios shape rating policy to serve their economic interests.

wanted screen violence ratings strengthened. Like the introduction of the PG-13 rating, the MPA's tweak to its rating block was perceived as yet another "soft" way for film studios to avoid R-ratings.³²

R-ratings are strongly associated with lower ticket sales.³³ In particular, from 2015 to 2019, R-rated films grossed half as much (49%) at the domestic as did PG-13 films, according to the Breathe California-UCSF Onscreen Tobacco Database. This can be explained by the fact that R-rated films' have smaller production and advertising budgets, in line with R-rated films' smaller revenue expectations.

As noted, however, R-rated films — while they are less of a box-office draw than youth-rated films, on average — have held their place in box office popularity. As the number of PG-13 films has declined, R-rated films have steadily accounted for 30-40 percent of the top-grossing film list every year since 2002 (39% in 2019).³⁴

1.2 | MPA ratings and tobacco content

The MPA has made public claims about how it treats onscreen smoking in its ratings. Before 2017, the organization claimed that it took smoking by "underage" characters into ratings consideration. After 2007, it claimed that it took all smoking into ratings consideration. We have compared these claims with the MPA's rating records and detailed observations of onscreen smoking in the Breathe California-UCSF Onscreen Tobacco Database from 2002 to 2019.

1.2.1 | MPA's treatment of onscreen smoking by kids

Before 2007, the MPA claimed that smoking by underage characters (that is, seventeen years and younger) was a factor in its ratings.³⁵ However, between 2002 and 2007, there were fifty top-grossing films that depicted a total of 81 youth (70 adolescents and 11 children) using tobacco. The MPA rated more than half (52%) of these films for youth (6% PG and 46% PG-13). None of the MPA's ratings for these films included "smoking" or "teen smoking" in its MPA rating block.

From 2008 through 2019 — after the MPA asserted that "all smoking" was "now a rating consideration"³⁶— forty more top-grossing films were released showing 68 youth (56 adolescents and 12 children) smoking. Of these post-2007 films, more than one-third (36%) were youth-rated PG (3%) or PG-13 (33%). Only three of these forty films (8%) carried a smoking-related descriptor in their MPA rating blocks. None of the descriptors mentioned "teen smoking."³⁷

1.2.2 | MPA's misleading tobacco descriptors after 2007

In late 2006, under mounting pressure from state Attorneys General (AGs), the MPA invited the Harvard School of Public Health to advise the U.S. film industry on the problem of smoking in movies. On April 3, 2007, Harvard made public its recommendation that the industry should "eliminate the depiction of tobacco smoking from films accessible to children and youths."³⁸ Rather than implement Harvard's

³² The Christian Science Monitor (2013). [MPAA movie ratings: New initiative to assist parents get mixed reviews](#). Accessed 3/27/20.

³³ Glantz SA, Polansky JR (2012). [Movies with smoking make less money](#). *Tobacco Control* 2012;21:569-571. Accessed 3/27/20.

³⁴ Breathe California-UCSF Onscreen Tobacco Database

³⁵ Associated Press (May 2007; updated January 2015). [MPAA adds smoking as a film-rating factor](#). Accessed 3/27/20.

³⁶ [Letter from MPAA Chairman Dan Glickman to Maryland AG Douglas Gansler, 10 May 2007](#). Accessed on 3/27/20.

³⁷ Breathe California-UCSF Onscreen Tobacco Database. In addition to the 90 top-grossing films 2002-19 depicting teen or child smokers (44% youth-rated), the database also shows that of 42 films grossing at least \$1 million domestically, but not achieving top-grossing status, also depicted school-age characters smoking. Of these 42 lower-grossing films, nine of the fifteen youth-rated films included smoking descriptors (60%) but only three (20%) referred to "teen smoking."

³⁸ Harvard T.H. Chan School of Public Health (2007). [Presentations to the Motion Picture Association of America \(MPAA\) on smoking in the movies](#). See especially HSPH Dean Bloom's summation. Accessed 3/27/20.

recommendation, on May 10, 2007, the MPA released a press announcement and letter to the AGs stating that “now” all tobacco depictions (not only depictions of smoking by characters under 18, as it had previously claimed) would be a “consideration” in ratings.³⁹

The announcement failed to explain precisely what effect tobacco content would have on MPA’s film ratings — merely remarking that affected films might be labeled for smoking with a “descriptor” (rating reason) in its rating block. U.S. Senators⁴⁰ and national health organizations immediately declared the policy inadequate. When the MPA declined to provide policy specifics, the AGs treated it as a sign of bad faith and canceled a meeting with the MPA.⁴¹

In fact, the MPA has never made tobacco content an explicit rating factor. Its *Classification and Rating Rules* (last revised in 2010)⁴² contains no reference to “tobacco,” “smoking” or any type of tobacco or nicotine product, nor published any specification for when a “smoking” descriptor is to be assigned (if at all). In contrast, it makes numerous explicit references to other types of onscreen content that trigger higher ratings (Table 1).

Table 1 | References to rating factors in MPA’s *Classification and Rating Rules* (2010 edition):

Rating factor	Number of references
“adult activities”*	3
“alcohol/drinking”	0
“drug(s)”	7
“language”	7
“nudity”	8
“sex(ual)”	10
“tobacco/smoking”	0
“violence”	11

* Defined in the *Rules* as “activities that adults, but not minors, may engage in legally”

We evaluated how many MPA-rated top-grossing films in the Onscreen Tobacco Database carried MPA “smoking” descriptors from 2008, the first full year after the MPA announced that “all” smoking would be a ratings “consideration,” through 2019 (data table in Appendix A).⁴³

Share of smoking films with smoking descriptors | From 2008 through 2019, the MPA applied smoking descriptors to six percent of all top-grossing films with tobacco content (50 of 822 films; 7% in 2019) — that is, to 38 percent of G or PG films with smoking (18 of 47; 25% in 2019); to nine percent of PG-13 films with smoking (32 of 345; 14% in 2019); and to none of the 430 R-rated films with smoking. Overall, of the youth-rated (G/PG/PG-13) films with smoking, 13 percent included a smoking descriptor (50 of 392; 17% in 2019).

Films, tobacco incidents, and in-theater tobacco impressions left unlabeled | Across MPA ratings 2008-19, 94 percent of all top-grossing films with smoking were left unlabeled for smoking, including 87 percent of youth-rated films with smoking. Of the 30,700 total tobacco incidents in top-

³⁹ See note 36.

⁴⁰ Letter from U.S. Senators Durbin, Kennedy, and Lautenberg to MPAA Chairman Dan Glickman on June 22, 2007. Accessed 3/27/20.

⁴¹ Letter from MPAA Chairman Dan Glickman to Vermont Attorney General William Sorrell on September 14, 2007. Accessed 3/27/20.

⁴² MPA (2010, most recent edition). *Classification and rating rules*. Accessed 3/27/20.

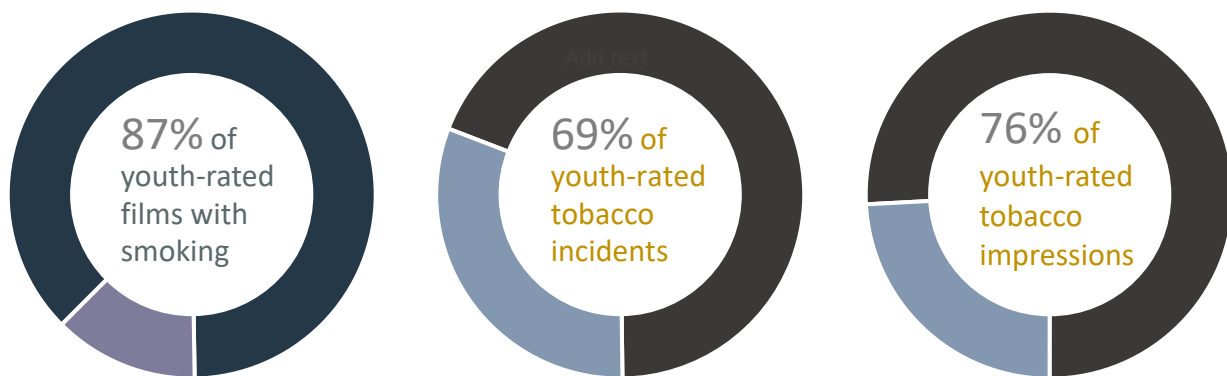
⁴³ A small number of top-grossing films 2008-19 (18 of 1,677) were not MPA-rated and are not included in this analysis.

grossing films, 89 percent were in films with no label for smoking, including 69 percent of the incidents in youth-rated films. Of the 216 billion in-theater tobacco impressions delivered by top-grossing films, 89 percent were delivered by films left unlabeled for tobacco content by the MPA, including 76 percent of impressions from youth-rated films (Figure 3).

Are smokier films more likely to be labeled for smoking by the MPA? While R-rated films average more smoking than youth-rated films, no top-grossing R-rated film was labeled for smoking by the MPA. When the top-grossing *youth-rated* films with smoking released from 2008 to 2019 are divided into quartiles by number of tobacco incidents, we observe that 33 percent of the top-quartile films (with 33 or more tobacco incidents per film) were labeled for smoking by the MPA compared to six percent of the lower three quartiles of smoking films (fewer than 33 incidents per film).

It is important to note that, even among the smokiest youth-rated films, two-thirds (67%) lack MPA “smoking” descriptors, along with 62 percent of their tobacco incidents (5,266 of 8,528 top-quartile incidents) and the 72 percent of the tobacco impressions they delivered (52 billion of 72 billion top-quartile impressions). Figure 3 shows the portion of all top-grossing, youth-rated films, incidents, and impressions that MPA left unlabeled from 2008 through 2019.

Figure 3 | Unlabeled for smoking by the Motion Picture Association, 2008-2019



1.3 | TVPG ratings and tobacco content

TV programs that premiere on broadcast, cable or streaming channels⁴⁴ use an entirely different rating system than the MPA does for films: the TV Parental Guidelines⁴⁵ (TVPG). This voluntary, industry self-regulation system was set up as part of the Telecommunications Act of 1996. The Act also added V-Chip technology to all TV sets manufactured after 2000, theoretically enabling parents to block certain content using codes embedded in the TV program. MPA and TV Parental Guidelines ratings (Table 2) differ in three fundamental ways:

- 1 | MPA ratings are assigned by an MPA-recruited and trained panel of parents, formally independent of the films’ producers and distributors. In contrast, TV Parental Guidelines ratings are self-assigned by “broadcast and cable networks, or program producers,” declares the TVPG.⁴⁶ Broadcasters have, in the past, maintained standards-and-practices department to comply with

⁴⁴ Includes full series, limited series, specials, and feature-length films (sometimes referred to as MOWs, or “movies of the week”) made for television and not rated by the MPA.

⁴⁵ TVPG Council annual revenue (2017): \$101,000, undifferentiated. Source: IRS Form 990-EZ.

⁴⁶ TVPG (no date). *Understanding the TV ratings and parental controls*. Accessed 3/27/20.

Federal Communications Commission standards, avoid public complaints, and meet advertisers’ concerns. Where these departments still exist, they may play a role in assigning ratings to the programs their company produces or carries.

2 | The MPA specifies five rating codes (G, PG, PG-13, R, NC-17) and manifold rating reasons are specified in its rating rules. The TV Parental Guidelines has seven rating codes but only five broad rating reasons: suggestive dialogue (“D”), fantasy violence (“FV,” only in children’s programs), coarse or crude language (“L”), sexual situations (“S”), and violence (“V”). The TV Parental Guidelines do not treat tobacco as a rating factor.

3 | TV Parental Guidelines ratings and their “associated content descriptors” are specified to appear once at the upper-left corner of the screen for 15 seconds at the start of the program and, optionally, at the beginning of the second hour if it is a feature-length, made-for-TV movie.⁴⁷ Beyond that — unlike the MPA’s advertising specifications — the TV Parental Guidelines web site specifies no rules for producers or distributors concerning when to spell out TV rating descriptors or if TV rating should be included in program listings, on a web site or other program promotions.

Table 2 | Motion Picture Association (MPA) and TV Parental Guidelines (TVPG) rating codes

Film rating codes and definitions ⁴⁸		TV rating codes and definitions ⁴⁹	
G	General audiences All ages admitted	TV-Y	All children
PG	Parental guidance suggested Some material may not be suitable for children	TV-Y7	Directed to older children
PG-13	Parents strongly cautioned Some material may not be suitable for children under 13	TV-Y7-FV	Directed to older children — fantasy violence
R	Restricted Under 17 requires accompanying parent or adult guardian	TV-G	General audience
NC-17	No one under 17 admitted	TV-PG	Parental guidance
		TV-14	Parents strongly cautioned
		TV-MA	Mature audience only

In 2018, Congress asked the FCC to evaluate the TV Parental Guidelines and its Monitoring Board, which is made up of broadcasting and cable operators and their trade groups, along with five “public interest members” appointed by the Monitoring Board chairman.⁵⁰ The evaluators heard positive

⁴⁷ In some data sets, made-for-TV movies are referred to as “MOWs,” a holdover from the era of network “Movies of the Week.”

⁴⁸ MPA Classification & Rating Administration (no date). [The film rating system](#). Accessed 3/27/20.

⁴⁹ See note 47.

⁵⁰ The TVPG Monitoring Board’s current chair is Michael Powell, chief D.C. lobbyist for the broadband and cable TV industry. He served as FCC chair 2001-2005. The public interest members listed on the TVPG web site, as of March 12, 2020, include the [American Academy](#)

comments about the TV ratings from the TV industry but criticisms from public interest groups and some parents' organizations.⁵¹ The FCC recommended that the TV Parental Guideline's board promote its ratings, increase its operational transparency, and evaluate how accurately and consistently the ratings are applied. In response, in January 2019 the Board published its first annual report⁵² (covering 2018) and claims to have established a "formal spot check" process to review rating practice.

While the MPA offers the public an online "lookup" tool for finding the rating of a specific film title, or for all films of a specific rating in a single year,⁵³ the TV Parental Guidelines' website offers no lookup tool and does not appear to maintain a publicly accessible database of historical and current TV ratings. Without this data, it is effectively impossible for the FCC or any other stakeholder to review the appropriateness of ratings assigned to content by TV producers or distributors or to hold this self-regulation scheme accountable.

2 | HOW VIDEO-ON-DEMAND (VOD) SERVICES TREAT TOBACCO CONTENT

2.1 | Types of video-on-demand services

The spread of broadband Internet connections streaming video data to an array of digital devices including phones, tablets, laptops, desktops, and connected TVs has transformed the distribution of feature films and TV entertainment. There are currently four types of services delivering VOD:

SVOD | Subscription video on demand. (Example: Netflix, Amazon Prime, Apple TV+)

How it works: Subscription fee entitles the viewer to unlimited titles.

AVOD | Ad-based video on demand. (Examples: YouTube, Hulu "free" version)

How it works: Advertising before, during, and after a title generates revenue. AVOD services may offer an ad-free "premium" version requiring a subscription.

TVOD | Transactional video on demand. (Example: Amazon, Apple TV)

How it works: Viewer pays a fee to rent or purchase access to a single title or season.

HYBRID | Mix of above models. (Example: Comcast Xfinity X1)

How it works: Hybrid services offered via Internet (Amazon) or cable (Comcast Xfinity). They include both free, non-ad titles (like an SVOD) and buy-or-rent titles (like a TVOD). Cable-based hybrids now offer connections to apps that connect to SVOD and AVOD services, increasing their value as one-stop hubs for consumers.

Subscription and ad-supported VOD services exist side-by-side with "linear" TV broadcasters and with premium and ad-supported cable channels. Traditional multi-media companies (film, TV, cable) are consolidating to battle — or imitate — the growth of internet-based VOD companies worldwide.

The range of pure-play and hybridized business models being tried across the industry could influence how different companies deal with onscreen content and ratings issues. Like broadcasters,

of Pediatrics, Boys & Girls Clubs of America, Call for Action, Entertainment Industries Council (website defunct; 2017 Form 990), and National PTA. See: <http://www.tvguidelines.org/aboutUs.html>.

⁵¹ See <https://docs.fcc.gov/public/attachments/DA-19-423A1.pdf>. Specific critiques include: (1) that self-rating led ad-supported TV services to avoid assigning the TV-MA rating, which discourages advertisers, and (2) that parents do not understand the TV rating system or its content descriptors and "few use the V-chip" (p. 7).

⁵² TVPG (2020). 2019 Annual Report. Access 3/27/20.

⁵³ MPA Classification & Rating Administration (no date). Filmratings.com. Accessed 3/27/20.

ad-supported VOD services may cultivate broad audiences with common-denominator programming badged with family-friendly TV Parental Guidelines ratings. Subscription services — not beholden to advertisers — may aim to occupy a particular family-friendly niche (Disney+) or, like HBO and Netflix, produce more “mature” (TV-MA) material that sets them apart from broadcast and cable.

Even though they do not show traditional commercials, subscription services may adopt more or less aggressive brand integration (product placement) programs to defray the production costs of their original TV series and made-for-TV movies.⁵⁴

Despite their different business models, all video-on-demand services want to offer consumers the sensation of maximum choice through friction-free, instantly-gratifying interactions. Each shares the compelling goal of increasing Average Revenue per User (ARPU).

2.2 | Popular VOD services, compared

To compare VOD service’s tobacco content practices and parental control tools, we surveyed nine popular services (Table 3).

Table 3 | Video-on-demand services surveyed for this report (data as of February 2020)

VOD service	Company	U.S. accounts	TITLES:	Films	TV series	Originals
Amazon Prime Video	Amazon.com	66 million	26,120	23,930	2,120	70
Apple TV+	Apple	34 million	20	0	0	20
CBS All Access	ViacomCBS	10 million	130	50	70	10
Disney+	Disney	23 million	880	690	170	20
HBO Go / HBO Now	AT&T	8 million	1,130	940	0	190
Hulu	Disney	32 million	2,630	1,200	1,370	60
Netflix	Netflix	61 million	5,360	3,460	1,470	430
Starz	Lionsgate	4 million	1,440	1,300	110	30
Xfinity X1	Comcast	20 million	8,300	4,970	3,330	0

More data, sources, and notes in Appendix B.

Observation: Together, these services offer 170,000 hours of content: more than 36,000 film titles, 8,600 TV titles, and more than 600 original titles.⁵⁵ Overall, films comprise 80 percent of all available titles, but TV series make up the majority of total programming hours (Figure 4).

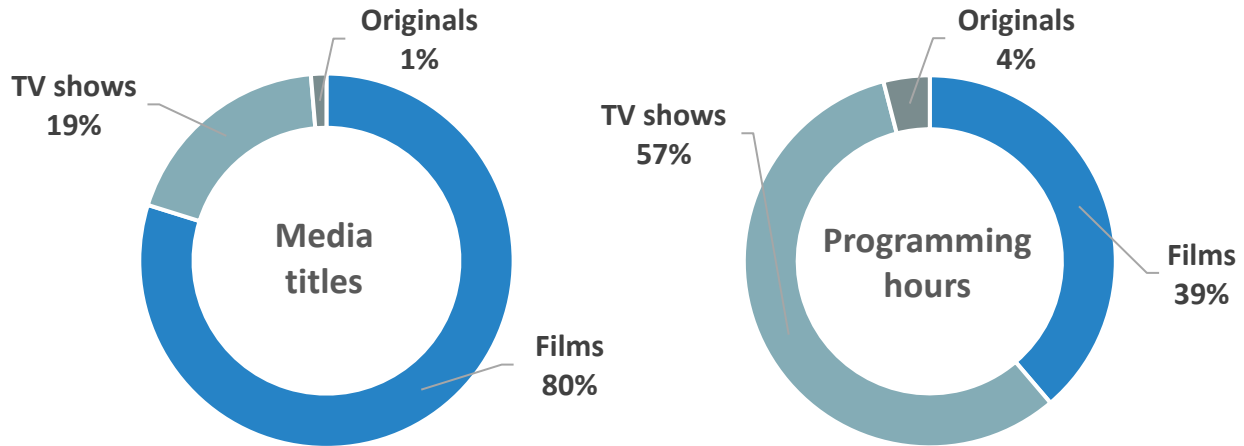
Four services offered more than 10,000 hours of content each: Amazon Prime Video, Disney’s Hulu, Netflix, and Comcast’s Xfinity X1. In May 2020, AT&T will launch its new VOD service, HBO Max, with a claimed 10,000+ hours of Warner Bros., HBO, and licensed content. In July 2020,

⁵⁴ Barrett K (2019). *No ads, no problem: How marketers are collaborating with streaming platforms*. Marketing Dive. Accessed 3/27/20.

⁵⁵ Legacy films are frequently licensed to more than one service. The MPA reviewed and rated approximately 26,500 unique film titles from 1968 to 2019, including films that went straight to video or were not widely released theatrically. Of all these, 32% are rated G or PG, 22% are rated PG-13, and 45% are rated R, X or NC-17. This MPA ratings distribution differs substantially from the MPA ratings distribution in the 2,570 *top-grossing* films, 2002-2019: 20% rated G or PG, 44% rated PG-13, and 35% rated R. (SOURCE: MPA rating bulletins. MPA rating options have changed several times since 1968: see Note 31.)

Comcast will launch its 7,500-hour, ad-supported service drawing on its NBC and Universal content libraries. Disney is expected to load Fox-labeled film and TV content onto Hulu.

Figure 4 | Media mix of nine popular VOD services (February 2020)



2.3 | How VOD services funnel shoppers toward a choice

We surveyed the desktop browser versions of each of these on-demand services in February and March 2020. The views on their phone, tablet, and TV apps may differ from the desktop in some details. However, the services seek to keep their user experience the same across devices, so this survey can be expected to identify key likenesses and differences among the services themselves.

In general, e-commerce websites of all types are organized to serve two types of visitors: (a) searchers who have a specific objective in mind, and (b) browsing shoppers less sure of what they are looking for. The searcher just needs a search box. The browser needs more guidance to become a committed purchaser. To this end, most VOD sites are modeled on the conversion “funnel”: they first present familiar titles of common interest, then employ a variety of cues to narrow down a mass of plausible possibilities, step by step, to ensure a satisfactory transaction. Typical elements include:⁵⁶

Landing page | Highlights a featured title along with rows of film/TV posters customized to the shopper’s past choices. (E-commerce equivalent: “Were you here looking at wool jackets last week? Let’s start you out looking at jackets this week.”)

Preview feature | A quick, low-commitment way to explore a movie in a category. Hovering may cause a text box to fly out or a magnifier to enlarge the poster and add info. Not interested? You can immediately resume your browse. (“Take a quick look of this jacket without losing your place. Not your speed? Just keep looking.”)

Overview | To come even closer to the product, click to view a movie clip and gain even more info about it. The title you are focused on is now the biggest thing on the page. (“Here’s what you need to choose this jacket: colors, sizes, availability. Here, try it on.”)

Detail | The most curious seeker of information can make a detour to detailed information, requiring a click or other action. (“Where was the jacket made? Must it be dry-cleaned? What’s our return policy? *Some* people care about this stuff. We don’t bother anyone else with it.”)

⁵⁶ Download a slide deck showing examples of these pages, and example of VOD parental controls, at bit.ly/sfm-040220.

Rolling | Whether you are an impulse shopper or a cautious consumer, the funnel smoothly narrows your choice down to the “call to action” — to click and play the video. No longer distracted by seeing other choices on the screen, you commit to watch *this* title. (“You’ve seen the choices. You’ve invested enough time. You buy the jacket.”)

2.4 | How VOD services display ratings and content notices

For this survey, we looked at how each VOD service displayed MPA and TV Parental Guidelines rating codes (example: PG-13 or TV-14) and rating reasons (descriptors) on funnel pages and in search results. We also noted if the service includes other information, such as age classifications, labels, reviews or content notices not specified by the MPA or TV Parental Guidelines rating schemes (Table 4).

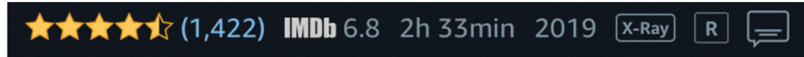
Table 4 | Popular VOD services’ displays of film and TV ratings

SERVICE	SITE FEATURES WHERE RATING-RELATED INFORMATION APPEARS						Other labels or content notices
	Landing	Preview	Overview	Detail	Video rolling	Search results	
Amazon HYBRID		<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA code •TVPG code •IMDb score 	<ul style="list-style-type: none"> •MPA code •TVPG code •CSM scores 		<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •IMDb X-ray
Apple TV+ SVOD	<ul style="list-style-type: none"> •MPA code •TVPG code 		<ul style="list-style-type: none"> •MPA code •TVPG code •CSM code 	<ul style="list-style-type: none"> •MPA code •TVPG code •CSM headline 	<ul style="list-style-type: none"> •MPA code •TVPG code + reasons 		<ul style="list-style-type: none"> •Genre
CBS All Access SVOD					<ul style="list-style-type: none"> •MPA code •TVPG code + reasons 		
Disney+ SVOD			<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA/TVPG codes + reasons 		<ul style="list-style-type: none"> • “Contains tobacco depictions” •Photosensitivity •Genre
HBO Go / HBO Now SVOD			<ul style="list-style-type: none"> •MPA code 	<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA/TVPG codes + reasons 		
Hulu A/SVOD		<ul style="list-style-type: none"> •MPA code 	<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA code •TVPG code 		<ul style="list-style-type: none"> •Genre
Netflix SVOD	<ul style="list-style-type: none"> •MPA code •TVPG code (for featured title only) 	<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA code + reasons •TVPG code 	<ul style="list-style-type: none"> •MPA code + reasons •TVPG code 		<ul style="list-style-type: none"> • “Smoking” • “Gore” •Profile match (%) •Photosensitivity •Genre
Starz SVOD			<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA/TVPG codes + reasons 		<ul style="list-style-type: none"> •Genre
Xfinity X1 HYBRID			<ul style="list-style-type: none"> •MPA code •TVPG code •CSM code •Rotten Tomatoes score 	<ul style="list-style-type: none"> •MPA code •TVPG code 	<ul style="list-style-type: none"> •MPA code •TVPG code 		

- LEGENDS** |
- Ratings: MPA (Motion Picture Association), TVPG (TV Parental Guidelines), CSM (Common Sense Media). IMDb (Amazon) posts audience review ratings. Rotten Tomatoes (Comcast) posts audience and critics’ review scores.
 - Rating code (ex: PG-13); Rating reason (ex: violence).
 - Site features showing MPA and/or TVPG ratings reasons are highlighted. Features absent from a service are crossed out.
 - Content notices or title characterizations not found in MPA/TVPG rating reasons, added at the VOD service’s discretion, are listed under “Other labels or content notices.” (See Detailed Reviews in Section 2.4.1)

Observations | At first glance, it seems that VOD companies post a lot of ratings. All nine services we surveyed displayed MPA and/or TV Parental Guidelines rating *codes* (ex: PG-13 or TV-14) on at least one page that users pass through to select a movie or TV show. Only CBS All Access withholds *all* rating codes until after the visitor has selected a title and started it rolling. Even on most pages where rating codes appear, however, VOD services bury them in a string of other acronyms and icons. Therefore, even if the information is posted, it is not in a form designed to attract attention and affect the user’s decision to watch a given film or video (Figure 5).

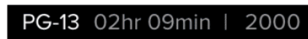
Figure 5 | MPA rating code displays on video-on-demand pages



Amazon Prime Video



Apple TV+



CBS All Access (rolling or resuming films only)



Disney+



HBO Go



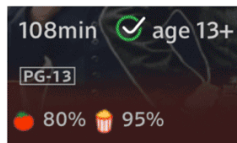
Hulu



Netflix



Starz



Xfinity X1

Note | Images are scaled to represent their appearance in a typical desktop browser view. Digital devices with smaller screens, such as phones and tablets, will size them smaller; larger screens, such as connected TVs, may size them somewhat larger.

Amazon, Apple, and Xfinity supplement the MPA and TV Parental Guidelines ratings with Common Sense Media (CSM) rating codes, customer reviews, or review headlines. (CSM is a non-profit with substantial support from media companies and entertainment and technology-linked foundations. CSM also has revenue generating affiliate-marketing relationships with companies including Amazon and Apple.⁵⁷) The VOD services that use extracts from CSM do not link to CSM’s full reviews or mention the smoking or other substance use that is often covered in CSM’s full reviews.

Summary of VODs’ display of rating *reasons*:

- Netflix is the only VOD service that displays *rating reasons* (for MPA film ratings only) *before* the user starts playing the video. But it shows these reasons on a film’s Details page, which the user can access only by pro-actively clicking on a generic link (“Details”). This requires a deliberate detour from the site’s flow. On this Details page, the rating reasons display as grey text against a black background, reducing readability. (See similar treatments in Figure 5.)
- Three of nine VOD services (33%) show both MPA and TVPG rating reasons, but only for a few seconds after the video is already selected and rolling: **Disney+**, **HBO Go/HBO Now**, and **Starz**.
- Three of nine services (33%) include both films and TV shows in their media mixes, but they show ratings reasons for film titles only (**Netflix**) or for TV titles only (**Apple TV+**, **CBS All Access**) — not for both. These three services also display the rating reasons for a few seconds only after the film or video is already selected and rolling.⁵⁸
- Three of nine services (33%) never show the user the reasons for an MPA or TVPG rating at any time: **Amazon Prime Video**, **Hulu**, and Comcast’s **Xfinity**.

Other content notices | Disney+ sometimes mentions if a video includes tobacco content, briefly displaying the phrase “Contains tobacco depictions,” among other descriptors, after the video starts to roll. Netflix also now adds a content notice — “smoking” — to some of its own original TV shows’ Details pages and for a few seconds after the video is selected and starts to roll.⁵⁹ Netflix does not appear to report “smoking” in MPA-rated films unless the original MPA rating noted it; however, the MPA ratings mention the smoking in only six percent of all top-grossing films with smoking since 2008 (see Section 1.2.2).

2.4.1 | Detailed reviews of VOD rating practices

- **Amazon Prime Video** (Amazon.com) | Amazon.com owns the Internet Movie Database (IMDb) and supplements its film and TV show descriptions with IMDb-user review “scores.” Perhaps to avoid tempting the user to leave the Amazon site, it provides no link to the title’s actual IMDb.com page. Amazon also offers IMDb “X-ray” features: cast profiles and trivia. Amazon’s Details page does not provide the rating reasons attached to the specific title. Instead, it gives the rating code’s definition (ex: “PG-13 (Parents Strongly Cautioned)”). Amazon is one of only two services to allow the user to search its media

⁵⁷ 2017-18 Common Sense Media annual report and 2017 Form 990 suggest that Bezos Family Foundation accounted for \$5 million+ of \$11.9 million in CSM grants and contributions. Other entertainment and technology-linked entities supporting CSM include Annenberg, Anschutz (Walden Media), Best Buy, Bloomberg, Chan Zuckerberg, Disney Worldwide Services, Inc., and Twitter Inc. Listed “distribution partners” include Apple, AT&T, Charter, Comcast, Cox, Sky, Verizon, and Vudu (Walmart). Apple iTunes and Amazon marketing affiliate relationships are listed at <https://www.common sense media.org/affiliate-links>.

⁵⁸ Hastings M. Netflix (March 5, 2018). [Introducing PIN protection and other enhancements for informed viewing](#) (blog). Accessed 3/27/20. Netflix added MPA and TVPG rating codes to its rolling videos prior to joining MPA’s board of directors on January 22, 2019.

⁵⁹ By the end of March 2020, Netflix had added U.S. “smoking” notifications to 50% (193 of 386) of its scripted, original TV shows produced worldwide, including 55% of its teen-rated shows and 72% of its adult-rated shows. For the data sample and initial analysis, go to bit.ly/sfm-vod-0420.

titles by rating code (ex: search for “PG-13 Prime movies”), but it does not offer ratings, rating reasons, or specific content as search filters; search filters are made available for release years, user ratings, length (minutes), and director’s name.

- **Apple TV+** (Apple) | Apple never shows MPA rating reasons for its original feature films and does not display TV Parental Guidelines rating reasons until the video is already rolling. The only part of the CSM review that Apple shares with the user is the review’s headline. This may be uninformative. For example, the CSM excerpt displayed in Apple’s Details section for *The Morning Show* (TV-MA) is: “Great actors and a strong storyline in compelling drama.” To keep the user on its site, Apple does not link to the show’s full CSM review, which includes a “Drinking, Drugs & Smoking” rating of 3/5 and notes drunkenness, smoking and addiction.⁶⁰ Apple’s CSM extract on *For All Mankind* (TV-MA), a fantasy take on the U.S.-Soviet space race, reports that “Intriguing historical fiction space drama has cursing, sex.” The full review has a 3/5 substance use rating and remarks “Cigarette smoking is commonplace, given the era.”⁶¹ CSM has declared Apple to be a marketing affiliate and might receive fees for Apple’s use of CSM age-classifications and review extracts.

- **CBS All Access** (ViacomCBS) | This VOD service is known as a “catch-up” service, allowing users to view linear television anytime, anywhere. Linear (also called “terrestrial”) television still accounts for more than three-quarters of all TV consumption. Internet-based catch-up and time-shifting services are a fast-growing part of that consumption. CBS All Access is the only VOD service that denies users any view of MPA or TV Parental Guidelines rating codes and rating reasons until the user has selected the video and it is rolling. Even then, MPA rating reasons are not shown.

- **Disney+** (Disney) | Disney never spells out the TV Parental Guidelines rating reasons. Instead it uses that rating scheme’s approved initials (ex: “FV” for fantasy violence). While desktop views of ratings and reasons in Disney+ often proved glitchy — flashing information for two seconds or less — the usual duration on a TV screen is approximately eight seconds. Disney’s notification for tobacco content, “Contains tobacco depictions,” appears only after the video is rolling. This phrase scores as very difficult to comprehend on readability tests (Flesch Kincaid Grade Level 17); appears against a distracting screen environment; and fails to communicate the health hazard that onscreen smoking presents. Approximately half of Disney films with any smoking offered on Disney+ in March 2020 were labeled for tobacco content: the labeled films accounted for 80 percent of the tobacco incidents in all of the films.⁶²

- **HBO Go / HBO Now** (AT&T) | HBO Go and HBO Now are identical VOD services marketed through different channels. Once the visitor makes a video selection, the rating and reasons appear briefly (about three seconds) before a minute-long trailer (advertisement) for a *different* video title is shown; only after that advertisement does the user-selected video start to roll. This procedure separates the video’s rating code and rating reasons, in time, from the material to which it applies and may confuse the user as to which video title the ratings information actually applies, diminishing its relevance. Starz (Lionsgate) is the only other VOD service to interject an advertisement for another title between the ratings information and the video to which it actually applies. AT&T’s upcoming HBO Max service (May 2020), populated with Warner Bros. and New Line films, Warner’s TV series, and HBO originals, will coexist alongside its existing VOD services. HBO Max’s treatment of tobacco content, ratings, and parental controls were not part of this survey.

⁶⁰ Slayton J (2019). Common Sense Media TV Review: [The Morning Show](#). Accessed 3/27/20.

⁶¹ Camacho M (2019). Common Sense Media TV Review: [For All Mankind](#). Accessed 3/27/20.

⁶² Breathe California-UCSF Onscreen Tobacco Database.

- **Hulu (Disney)** | Some films on Hulu (ex: *Super 8*) do not show their MPA rating codes on Previews or Rolling, but do show them in Details, which requires the user to make a deliberate detour. Unique among VOD services surveyed, Hulu announces TV-MA codes in a voice-over and cautions, “This program is intended only for mature audiences. Viewer discretion is advised.” Hulu is one of three services that never show the visitor an MPA or TV Parental Guidelines rating reason on its site. The entertainment industry press has persistently speculated that Disney will use Hulu as its VOD platform for Disney’s extensive Fox film and TV show catalogs. These include hundreds of films with smoking and many films with R-ratings. As of March 2020, Hulu’s current ratings-display practices appear to be out of step with Disney-branded tobacco depiction and notification procedures (see Disney+, above). Despite verbal assurances from Disney, as of March 15, 2020, the company had not updated its 2015 tobacco depiction policy⁶³ to cover Hulu and the 20th Century Studios and Searchlight production units it acquired from Fox in 2019.

- **Netflix (Netflix)** | On Netflix’ Details pages, the TV-MA code is always accompanied by the text, “For mature audiences. May not be suitable for children 17 and under,” but the rating reasons are not shown. In July 2019, after public criticism over smoking and tobacco brand display in its show *Stranger Things* (TV-14), Netflix pledged to keep its future youth-rated original productions smokefree.⁶⁴ By March 26, 2020, the company had not published the standard’s actual language. In March 2020, Netflix began adding a “smoking” label to its original shows with tobacco content, but the content notification appears only in the Details page and briefly only after the user chooses the show and it starts rolling; Netflix does not warn of health harm. By the end of March, a “smoking” label appeared on half of Netflix’s scripted original series,⁶⁵ but the consistency of its labeling practice can only be judged against the total number of its offerings with any smoking. Netflix does not add the label to MPA-rated films unless a “smoking” descriptor appeared in the MPA’s own rating — a rare occurrence (see Section 1). Netflix substitutes its own terminology (ex: “gore” or “fear”) for TV Parental Guidelines rating reasons on TV shows.

- **Starz (Lionsgate)** | Like HBO Go / HBO Now, Starz delays displaying MPA and TV Parental Guidelines rating reasons until after the visitor has selected a video. Starz then interjects a trailer for another Starz attraction before showing the selected video. The separation between the rating and the actual video is confusing and likely blunts any informative effect. When it does appear, the rating display is brief, about four seconds.

- **Xfinity X1 (Comcast)** | Xfinity is the main user interface for Comcast’s cable TV service. Like Amazon, Xfinity mixes large amounts of free and pay-per-view material and offers numerous apps and add-ons. Comcast subscribers can access the service on any web-connected device using “My Xfinity.” After a selected video is rolling, ratings codes persist on screen for 10-15 seconds while the video loads, a longer time than average. However, Xfinity is one of three VOD services never to show a rating reason on screen. Unusually, the Rotten Tomato rating on Xfinity actually links to the video’s Rotten Tomatoes page. This page, in turn, shows a film’s rating reasons in a scroll-down Info section.⁶⁶ It would take an extraordinary user to chase this information so far. Comcast’s upcoming Peacock VOD service (opening to Xfinity customers April 15, 2020 and debuting nationally July 15, 2020) is not part of this survey. Peacock will offer Universal, Working Title, DreamWorks, and Amblin films, along with NBC programs.

⁶³ The Walt Disney Company (2015). *Smoking in movies*. Accessed 3/27/20.

⁶⁴ Keveney B. USA Today (July 8, 2019). *Netflix vows to go ‘smoke-free’ in shows like ‘Stranger Things’ aimed at kids and teens*. Accessed 3/27/20.

⁶⁵ Go to bit.ly/sfm-vod-0420 for initial analysis of Netflix TV series with “smoking” labels.

⁶⁶ Rotten Tomatoes, owned by Comcast through Fandango Media, LLC., displays critics’ and audience approval scores. This site does not show TV Parental Guidelines ratings and reasons for TV shows, only MPA ratings and reasons for films.

2.5 | Do VOD rating practices comply with MPA rules?

Unlike the TV Parental Guidelines, the MPA’s copyrighted rating regime requires distributors to conform to MPA rules about how ratings are deployed. These rules are enforced through the MPA’s Advertising Administration office, sibling to the MPA’s Classification and Rating Administration. The Advertising Administration reviews all advertising material for MPA-rated films. Indeed, the MPA specifies, “[A]ll advertising subject to these [advertising] Rules must be submitted to and approved by the Advertising Administration prior to use in a public forum or medium.”⁶⁷ The MPA’s rating partner, the National Association of Theatre Owners (NATO), reports: “This adds up to more than 60,000 pieces of marketing each year, including theatrical, home video and online trailers, print ads, radio and TV spots, press kits, billboards, bus shelters, posters and other promotional materials.”⁶⁸

The MPA’s advertising rules also apply to the producer and distributor and their “licensees, sub-licensees, assignees or successors in interest” and specifically apply to “Internet advertising material and interactive features, banner advertising on the Internet, TV, Video-on-Demand (VOD), mobile phones or other media...”⁶⁹ Specifically:

These Rules apply not only to advertising initiated by the distributor of the rated motion picture but to any advertising material placed by any person or entity involved with production or distribution of the motion picture.⁷⁰

Subject to sanctions, the MPA states that “certain content restrictions” are universally applicable. These include the following:

Advertising artwork, images or displays may not manipulate the MPA rating symbols or legends, including Trailer Tags, or mischaracterize the rating information for the motion picture or otherwise state information which could reasonably create confusion about the rating or rating descriptors on the motion picture...

All advertising for non-theatrical releases, including streaming, VOD, digital download, UltraViolet™, DVD and Blu-Ray, shall include the same rating information as such advertising for the theatrical version.⁷¹

MPA advertising rules include a sheet of “Abbreviated Rating Blocks for Print, TV and Internet” but the text discusses the use of these blocks only in fractional print ads (ads measuring a few column inches, once common in newspapers), not in TV and Internet advertising. Use of MPA rating symbols in promotional material always requires the copyright symbol. The MPA may have approved VOD services’ use of MPA ratings outside of blocks, without copyright, and lacking the rating reasons. If so, the MPA rules for Internet advertising are so flexible that they appear to invite media companies to seek exceptions.

The wide variation in and weak observance of MPA advertising rules among the VOD services — including services owned by MPA-members’ parent companies AT&T, Comcast, Disney, Netflix, and ViacomCBS — raises the question of whether MPA has the will or means to enforce rules once routinely honored by major studios and independent producer-distributors alike in their print, physical packaging,

⁶⁷ MPA (2019). [Advertising Administration Rules](#) (see “Introduction”). Accessed 3/27/20.

⁶⁸ NATO (no date). [The MPAA Advertising Administration](#). Accessed 3/27/20.

⁶⁹ MPA (2019). [Advertising Administration Rules](#) (see Article II, Sec. 1 “Definition of Advertising”). Accessed 3/27/20.

⁷⁰ See note 68.

⁷¹ MPA (2019). [Advertising Administration Rules](#) (see Article III, Sec. 3 “Non-Theatrical Entertainment”). Accessed 3/27/20.

television, and in-theater advertising of films.⁷² If its rules effectively are suspended for film promotion in electronic media, the ratings' potential informational value to consumers is seriously degraded. It appears that the MPA's own rules are bypassed to suit large media companies' marketing objectives.

2.5.1 | Advertising smoking by teens violates MPA rules

Tobacco is specifically referenced in the MPA's rating and advertising rules in only one place: the *Advertising Administration Rules* (2019) state that advertising clips and trailers classified by the MPA as "Approved (Without Restrictions)" or "Approved With Restrictions" are not allowed to show:

Children or adolescents in adult situations or engaging in illegal activity, such as minors using alcohol, drugs or tobacco products, or adults influencing or enticing minors with alcohol, drugs or tobacco products; and depictions of minors in sexual situations.⁷³

As was shown in Section 1.2.1, young people have been depicted smoking in ninety top-grossing films from 2002 to 2019, nearly 45 percent of which were youth-rated PG or PG-13 (40 films out of 90). However, the MPA assigned a "smoking" descriptor (rating reason) to only three of the ninety films (3%), with no top-grossing film labeled for "teen smoking." After denying parents any advance notice in its ratings of teen smoking content in a film, the MPA's ban on including such scenes in advertising trailers makes certain that parents and their children will first learn of this content only after paying admission.

The MPA can take a step toward reducing overall youth exposure to onscreen smoking by keeping smoking, by any character, out of film trailers widely seen not only in theaters but on TV and online.⁷⁴ However, the only rule the MPA has made in this area applies to the relatively small number of films showing kids smoking (6%, 90 out of 1,436 top-grossing films with smoking, 2002-2019), and then, only if the advertising trailer shows smoking by the kids themselves, not the films' adult characters. Advertising the smoking in at least 94 percent of top-grossing films with smoking remains unrestricted, spreading tobacco exposures to audiences who may never choose to see the film itself.

3 | FEATURES AND FLAWS OF VIDEO-ON-DEMAND PARENTAL CONTROLS

Besides film and TV ratings, or in combination with ratings, parents have another option for shaping the media content available to their families. "Parental controls" built into TV hardware date back to the rise of cable in the 1980s. Despite support from the federal government and the integration of the V-chip with TV Parental Guidelines ratings in 1998, surveys consistently reported few parents using parental controls.⁷⁵ As of February 2019, some TV hardware makers offer purchasers online support for their TVs' parental controls, while others only discuss controls in product user manuals.⁷⁶

⁷² Failure to police adequately film and TV distributors' use of its rating marks may cause public confusion and weaken the MPA's protected rights to the ratings and the standards they purport to certify. See U.S. Patent and Trademark Office (no date). "[What is a certification mark?](#)" Accessed 3/27/20. Also see [Trademark Electronic Search System](#) (TESS) results for a search on the whole phrase "Motion Picture Association."

⁷³ This is the only explicit reference to tobacco in MPA's *Classification and Rating Rules* (2010) or *Advertising Administration Rules* (2019).

⁷⁴ Heulton CG et al (2006). Televised movie trailers: undermining restrictions on advertising tobacco to youth. *Archives of Pediatric and Adolescent Medicine*. 160(9):885-8. Accessed 3/27/20 at <https://www.ncbi.nlm.nih.gov/pubmed/16953010>.

⁷⁵ Kaiser Family Foundation surveys: 2001 and 2006; Congressional Research Service: 2011. More recently, attention has turned to young peoples' use of small screens: American College of Pediatricians (2016) and Pew (2016).

⁷⁶ TV manufacturers and marketers LG, Samsung, Sony, TCL, and Vizio offer online support for their parental control features, although it may be difficult to locate. Hisense, Insignia, Sharp, and Toshiba publish how-to information in user manuals only.

The VOD services we surveyed all offer their own *software* parental controls. In our survey, controls were activated in the desktop browser version of each service. The steps that parents need to take to actually use these controls are summarized in Table 5:

- 1 | the number of steps an account holder is required to take to reach the parental controls, before making actual settings;
- 2 | what restrictions were offered, including MPA and TV Parental Guidelines ratings or novel settings devised by the service;
- 3 | if the parental controls required the creation and use of a 4- or 5-digit PIN (Personal Identification Number) to edit or clear settings; and
- 4 | if the parental controls require or permit creation of one or more user profiles, which may allow quick switching among sets of personal restrictions.

Table 5 | Characteristics of parental controls in popular VOD services, February 2020

	Steps to reach settings	MPA & TVPG ratings?	PIN required	Profiles
Amazon Prime Video	5	Other	Yes	No
Apple TV+	5	Yes	Yes	No
CBS All Access	6	Other	Yes	No
Disney+	3	Other	No	Yes
HBO Go / HBO Now	3*	Varies by provider	Varies by provider	No
Hulu	6	Other	No	Yes
Netflix	3	Account-level only	Yes	Yes
Starz	2	Yes	Yes**	Yes
Xfinity X1	6	Yes	Yes	No

* Reaching the actual parental control set-up in the “TV provider” account (ex: Xfinity) requires additional steps.

** PIN is required to edit Starz profiles, but not to switch among profiles with different restrictions.

Observations: None of the VOD services surveyed provides direct access to its parental controls on its landing page or includes parental controls among its universal navigators (the important links that appear on all site pages). A newcomer to the service needs to search or explore to locate a link to the parental control set-up page. Once there, a majority of VOD services require a logged-in account holder to create (and memorize) a 4- or 5-digit Personal Identification Number (PIN) to make or edit settings.

Four of the services enable one or more personal user profiles. Each profile can carry different restrictions. Generally, users can easily switch from a restricted profile to an unrestricted profile without entering a password or PIN. (Netflix began requiring a PIN to switch profiles in March 2020.) Services without multiple profiles (that is, tracking a single account holder) require account holders to set restrictions account-wide and then to enter a PIN each time they wish to view a more restricted title.

One-third of these VOD parental control tools allow parents to use the familiar MPA and TV Parental Guidelines rating codes to set access restrictions. Other services aggregate these ratings into “Maturity Ratings” of their own devising or allow only a “Kids” setting. Parents are not able to filter searches or restrict viewing based on particular content (ex: “language,” “violence” or “smoking”).

3.1 | Detailed reviews of VOD parental controls

• Amazon Prime

Easy to find? No Parental Controls link on landing page.

How to get to set-up: It takes five steps — “Your Prime Video” > Settings > Account & Settings > Parental Controls > Set or confirm Prime Video 5-digit PIN.

How it works: If R-rated films and TV-MA shows are restricted, the account owner must remember and enter her PIN to before viewing any R or TV-MA title.

What’s unique: (1) No use of profiles. (2) Amazon employs its own “Maturity Ratings” that meld MPA and TVPG into four rating codes: “G,” “7,” “16” or “18.”. For example, “16” is defined as “General Audiences, Family, and Teens and Young Adults” and includes PG-13 and TV-14 material. (3) Amazon offers account holders a “Watch History” listing all titles viewed and the option to keep any title from being used to compute future recommendations (Accounts & Settings > Watch History).

Downsides: (1) Parents must remember and enter a 5-digit PIN each time they wish to view any restricted item; this may discourage sustained use of parental controls. (2) Amazon’s confusing Maturity Ratings are not explained on the Parental Control set-up page: the link to them was repeatedly found to be broken in January-February 2020. An explanation was finally located within the app at Digital Services & Content > Prime Video > Setting Up > Maturity Ratings.⁷⁷

• Apple TV+

Easy to find? No Parental Controls link on landing page.

How to get to set-up: It takes five steps — Account [icon] > Settings > Parental Controls > Set 4-digit passcode [PIN] and recovery email.

How it works: Passcode holder can set restrictions by MPA and TV Parental Guidelines ratings. The app does not define these ratings and provides no link to ratings definitions on the MPA, CARA or TV Parental Guidelines web sites.

What’s unique: No use of profiles; one set of content restrictions rules the account. PIN required to alter restriction settings.

Downsides: (1) To unblock a title, a parent must return to Settings, re-set the account-wide restrictions, then browse the site again to re-locate the title she intended to watch — a time-consuming process that may discourage sustained use of parental controls. (2) The app’s set-up page explicitly cautions that a child with access to the account holder’s “recovery” address (ex: parent’s email address) will be able to change the parental control’s passcode. The child will then be able to alter or cancel content restrictions.⁷⁸

⁷⁷ Or, after a Google search on “amazon maturity ratings,” go to <https://www.amazon.com/gp/help/customer/display.html?nodeId=G2C2CPZWGZWHZ42J>. Accessed 3/27/20.

⁷⁸ The implication is that parents need to set up a new, secret email account to protect their Apple+ passcode. That Apple has merely alerted parents to a serious flaw instead of fixing it (as of March 2020) suggests the priority it has so far given to developing parental control features. For comparison, Apple reportedly is spending \$6 billion to develop the *content* for Apple+. (Source)

- **CBS All Access**

Easy to find? No Parental Controls link on landing page.

How to get to set-up: It takes six steps — Account name > Account > Parental Controls: Off/On (requires account password) > Create 4-digit PIN.

How it works: Restrictions have four levels: All Kids/Older Kids/Teens/Adults, each combining MPA and TV Parental Guidelines ratings (ex: Adult = R/TV-MA/NC-17, and unrated material). The PIN is required to watch any restricted or locked content.

What's unique: No use of profiles. Requires account password to edit parental control settings (including turning them on and off), then requires a 4-digit PIN to bypass restrictions on the fly. Restriction settings are conveniently set using a slider. "Live TV" carried on this VOD service can be locked/unlocked separately.

Downsides: Forcing a parent to remember and use a 4-digit PIN to view each restricted or locked item may discourage sustained the use of parental controls.

- **Disney+**

Easy to find? No Parental Controls link on landing page.

How to get to set-up: It takes three steps — Sign in > Choose, Edit or Add Profile > "Kids Profile." The "Kids Profile" feature can be toggled on or off for any profile except the default "Primary Profile," which belongs to the account holder (Micky Mouse icon).

How it works: If the profile view on the landing page has a "Kids Profile" attached, only a G-rated subset of all the site's content is offered for browsing.

What's unique: Within the app, no passcode (PIN) is required to change profiles or settings. However, there appears to be no content on Disney+ stronger than PG.

Downsides: It appears that once a user signs into the Disney+ service, any user can choose any profile and edit any profile except the Primary Profile. It is difficult to discern what content the parent actually controls, unless directly supervising a child. Profiles may be used to gather usage data. There is no way to filter Disney+ films by their smoking content, even though Disney includes the phrase "Contains tobacco depictions" on nearly half of the fifteen G/PG films with smoking now running on Disney+. ⁷⁹

- **HBO Go / HBO Now**

Easy to find? No Parental Controls link on landing page.

How to get to set-up: It takes from nine to fifteen steps — Sign into HBO Go > Account name > Parental Controls > TV Provider Account > etc. Assuming that Xfinity is the TV provider, the actual set-up of parental controls is accomplished through the user's Xfinity online account, not on the HBO app. The Xfinity settings may serve several devices and apps (see Xfinity X1, below).

⁷⁹ The Breathe California-UCSF Onscreen Tobacco Database indicates that since 2002, Disney has released 30 G/PG films with smoking (including Fox acquisitions). As of mid-March 2020, fifteen of these films were running on Disney+, seven of them labeled for smoking content by Disney itself. The labeled films accounted for 80% of tobacco incidents in the fifteen films.

- **Hulu**

Easy to find? No Parental Controls link on landing page.

How to get to set-up: It takes six steps — Log in > Choose Profile > Hover over Profile > Manage Profiles > Create New Profile > Turn on to watch only kid-friendly programming.

How it works: Each new profile requires (1) turning on kid-friendly setting, or (2) filling out birth date and gender. If the birth date indicates the profile is for someone under 18 years of age, the following declaration is required: “I have obtained consent from my parent or guardian to register with Hulu.”

What’s unique: (1) No PINs. (2) Profile set-up asks a question about gender (Male/Female/prefer not to say) with the explanation: “We’ll use this information to create a more personalized Hulu experience for you based on your gender.” (3) Alone among the services surveyed, each time a user creates a new profile, Hulu requires her or him to consent to Hulu’s terms of use, which includes age limitations and reserves profile creation and editing to the account holder.⁸⁰

Downsides: While Hulu makes it relatively easy to attach a “Kid” setting to any profile, nothing appears to prevent a user from switching freely among restricted and unrestricted profiles. If so, Hulu, which offers content up to R and TV-MA, effectively has as few content controls as its sibling service, Disney+.

- **Netflix**

Easy to find? No Parental Controls link on landing page.

How to get to set-up: It takes three steps to set what Netflix calls “soft” (profile level) controls within the app (ex: on a smart TV): Hover over Profile > Edit Profile > Set “Allowed TV show and movies.”

It requires three-to-four steps to set “hard” (account level) controls, which can only be done online: Hover over Profile > Account > Parental controls > Enter log-in and password > Set PIN, Maturity level, and/or Restricted title(s).

How it works:

A | *Profile level controls:* In each profile, “Maturity level” can be set to (a) “For Little Kids only,” (b) “For Older Kids only,” (c) “For Teens and below,” or (d) “All Maturity levels.” Default setting is “All Maturity levels.”

Each profile also has a check box labeled “Kid?” If this box is checked, the profile’s options narrow to (1) “For Little Kids only” or (2) “For Older Kids and below.” If “Kid?” is then unchecked, the profile reverts to the default “All Maturity levels.”

⁸⁰ Examples of Hulu’s terms (<https://www.hulu.com/terms>):

“**3.1 Age Limitations.** The Services are not intended to be used by children without involvement and approval of a parent or guardian. If you are under the age of 13, you are not permitted to register with Hulu or provide your personal information to Hulu. If you are at least 13 and under 18 years of age (or under the applicable age of majority in your state or territory of residence), you may register with Hulu, but only if you have the consent of your parent or guardian, including consent to these Terms on your behalf, and for clarity, you may only modify an account, or associated profiles, with the consent of your parent or guardian. Please note that you must be at least 18 years of age in order to purchase certain Services....”

“**3.3 Profiles.** Hulu offers the option to personalize use of the Services through the creation of one or more profiles under one account. Only the account holder, and those with permission from the account holder, may create a profile. The account holder may access profile details and delete or otherwise modify profiles associated with the account.”

B | *Account* level controls: Beginning in March 2020, after entering log-in and password online, the Netflix user can create (or edit and save) a 4-digit PIN. This PIN can be used to override the “Maturity level” set in any profile, the account-wide Maturity level set in account level controls, or any restrictions on specific titles set in account level controls.

The user can use a slider to choose among account Maturity levels: “Little Kids” (TV-Y/G/ TV-G); “Older Kids” (TV-Y7/TV-Y7-FV/TV-G/PG); “Teens” (PG-13/TV-14); and “Adults” (R/TV-MA/ NC-17/NR/UR [meaning Not Rated and Unrated]). The user can also require that the PIN be entered, on a device, to view specific media titles.

What’s unique: A “Kids” option icon displays at the top of any page on the site viewed by any user, regardless of her profile’s Maturity level. If this “Kids” icon is clicked, then the catalog of titles is instantly revised to show only child-rated titles. To restore access to all titles, the user need only click the page-top icon labeled “Exit Kids.”

Downsides: Unless account settings are employed, any user can switch among Netflix user profiles, without entering a password or PIN, to avoid profile level restrictions. Setting and changing account settings can only be done online. In March 2020, there was a lag in account settings actually taking effect on devices; Netflix noted the problem, on its account level parental controls page. It suggested logging in and out Netflix or the device to remedy it.

Other downsides: Profiles, each of which can have its own Maturity level settings, do not indicate if higher or lower Maturity levels are in effect at the account level. This can lead to confusing behavior, because account settings automatically override less restricted profile settings and profile settings automatically override less restricted account settings. Finally, security features such as entering passwords and resetting PINS can be quickly bypassed if an online browser auto-fills the Netflix account holder’s log-in information.⁸¹

- **Starz**

Easy to find? No Parental Controls link on landing page.

How to get to set-up: It takes 2 steps — Setting > Profile Settings.

How it works: Select a profile icon, click a rating limit on an MPA or TV Parental Guidelines slider, confirm a 4-digit PIN, then click “Update Info.” Lock icons will appear on restricted rating levels.

What’s unique: Simplicity.

Downsides: Once signed in, any user can switch among profiles and avoid rating limits. Editing an individual profile, however, requires the PIN.

- **Xfinity X1**

Easy to find? No Parental Controls link on landing page.

How to get to set-up: It takes six steps — My Xfinity > Manage Settings > Xfinity ID, Passwords, & Pins > Learn About Parental Controls > Setting Up Parental Controls on Xfinity TV > Set Up Your Locks PIN and Turn Parental Controls On and Off for X1...

⁸¹ Netflix help pages for parental controls: <https://help.netflix.com/en/node/264>; PINs: <https://help.netflix.com/en/node/24805>; and profiles: <https://help.netflix.com/en/node/10421>.

How it works: After setting up a 4-digit “Locks” PIN using the Xfinity TV remote, the account holder can turn parental controls on and off; place locks by movie and TV rating; lock out movie titles, TV programs, channels or streaming applications; lock programs by time of day; and set up an additional PIN to block purchases.

What’s unique: Xfinity includes how-to videos. Once located and mastered, Xfinity parental control how-to’s and tools let a parent manage a multitude of options, platforms, and devices served by Comcast Xfinity internet and cable.

Downsides: It requires time and attention to manage these multifaceted controls. Like most other parental control schemes, accessing restricted material (as a parent may wish to do) requires disabling and then re-setting the controls or else entering a PIN to view each item — a time-consuming process that may discourage sustained use of parental controls.

4 | DISCUSSION

U.S. ratings downplay onscreen smoking | After commercially collaborating for generations with the international tobacco industry to promote smoking and tobacco brands in films and TV shows,⁸² and despite decades of conclusive evidence showing that exposure to onscreen tobacco imagery causes millions of young viewers to start smoking,⁸³ the U.S. film and TV industries have failed to modernize their rating standards to rate tobacco imagery R and TV-MA.⁸⁴

The TV Parental Guidelines does not include tobacco or nicotine as factors in its ratings. The MPA does not mention tobacco, nicotine or smoking in its official *Classification and Rating Rules*.⁸⁵ Both rating schemes fail to assign ratings appropriate to the smoking content that brings serious physical harm to young viewers.

The MPA has included “smoking” among its rating descriptors on only a small fraction of top-grossing films with smoking and has never rated a top-grossing film R because it contained smoking.⁸⁶ By severely downplaying the presence of tobacco on screen, the MPA’s rating descriptor practices risk creating the public perception that tobacco imagery is no longer prevalent on screen and that its public health risk is negligible. In fact, from 2015 to 2019, the amount of smoking in top-grossing films and popular streaming shows has substantially increased. At the same time, more households are viewing VOD services on a variety of digital devices, rapidly expanding anywhere-anytime access to films and original streaming shows.

⁸² See notes 3, 4, and 5. For a summary history of tobacco influence on entertainment media: National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health (2012). Preventing Tobacco Use Among Youth and Young Adults: A Report of the Surgeon General. Centers for Disease Control and Prevention. (Chapter 5: Historical links between the tobacco companies and the movie industry) Accessed 3/27/20 at https://www.ncbi.nlm.nih.gov/books/NBK99238/#_ch5_s79_. For additional detail on film and television, see UCSF Center for Tobacco Control Research and Education (2016). How long has Big Tobacco bought its way on screen? (Ninety-year timeline with research citations). Accessed on 3/27/20 at <https://smokefreemovies.ucsf.edu/sfm-ads/ad-113>.

⁸³ See note 6.

⁸⁴ With two categorical exceptions: (a) when the depiction unambiguously reflects the dangers and consequences of tobacco use, or (b) the depiction exclusively represents the tobacco use of an actual person, as in a biographical drama or documentary. See <https://smokefreemovies.ucsf.edu/policy-solutions>. Accessed at 3/27/20.

⁸⁵ MPA Classification and Rating Administration (2010). *Classification and Ratings Rules*. Accessed 3/27/20.

⁸⁶ We have identified one R-rated film with “smoking” in its Motion Picture Association rating block: a documentary about the nocturnal lives of art students in Warsaw, *Wszystkie nieprzespane noce* (2017). According to [IMDb](https://www.imdb.com/title/tt7000000/), the film grossed \$20,762 worldwide.

In late 2019 and early 2020, two large U.S. media companies independently began labeling tobacco content in some of their titles, a half-measure considered inadequate by every major health and medical authority for the last generation.

Despite being on notice that they are creating a deadly hazard for millions of young people in the U.S.,⁸⁷ no U.S. entertainment industry-supported rating entity, in its ratings or rating reasons, nor any company serving entertainment directly to the consumer, in its content notifications, informs families watching their tobacco-contaminated products that *onscreen tobacco imagery harms young viewers*.⁸⁸

Video-on-demand services downplay the ratings | Even if U.S. film and TV rating services were to start consistently naming tobacco imagery (“smoking”) among their rating reasons, most popular VOD services now bury the MPA and TV Parental Guidelines rating codes and suppress the rating reasons. When VOD services show rating reasons at all, it is generally only for a few seconds *after* the user has selected a film or show and the material is already rolling. Netflix and Disney+ add their own momentary smoking content notifications but only on out-of-the-way Details pages or after the user has completed a video transaction and the video is playing.⁸⁹ Such *ex post facto* notifications are, in themselves, unlikely to reduce youth exposure and health risk. No evidence exists that “smoking” labels, in the absence of an adult rating, have a protective effect.⁹⁰

On VOD video title pages, small-print age-rating codes from multiple sources are often shown on the same line or adjacent to audience review scores and critic quality scores from different sources (often owned by the VOD services’ parent company), and with icons representing the video’s technical specifications. In this confusing context, consumers may miss seeing MPA and TVPG rating codes entirely or fail to decipher them.

The VOD services’ failure to show rating reasons leaves parents uninformed. It also deprives consumers of information once considered essential by the Motion Picture Association and subject to specific MPA rules governing advertising material. As recently as 2013, the MPA *enlarged* the rating reasons in its own rating blocks. At that time, the MPA explained, “It’s the right thing to do. We want parents to know what they’re walking into.”⁹¹ Yet the VOD services we surveyed — five of them owned by MPA-members AT&T, Comcast, Disney, Netflix, and ViacomCBS — are out of step with the MPA’s own policy on showing rating reasons. Where entertainment companies and their self-regulation schemes are fully synchronized is in never giving any parent advance warning — in ratings, rating reasons or at point-of-purchase — that smoking on screen is harmful to young viewers.

Parental controls are often flawed | Besides offering confusing rating information, and less of it, the popular VOD services we surveyed also make their parental controls hard to find, challenging to understand, and difficult to operate securely. Perhaps in an effort to combine the MPA and TV Parental Guidelines (TVPG) ratings, VOD services often re-invent or re-name ratings within their control settings. Some require parents to create and remember 4- or 5-digit PINs (personal identification numbers), and to enter these numbers each time they want to view material restricted by account-wide settings. Others

⁸⁷ In 2007, state Attorneys General told the entertainment companies: “[E]ach time a member of the industry releases another movie that depicts smoking, it does so with the full knowledge of the harm it will bring to children who watch it...” ([Link](#))

⁸⁸ While Netflix notes “smoking” in some of its titles, when already selected, and Disney+ notes “Contains tobacco depictions” as some of its films with smoking start to roll, neither VOD service informs parents that onscreen tobacco exposure presents a physical risk to young viewers.

⁸⁹ This is reminiscent of one major studio’s stated policy of placing a “health notice” about tobacco content in the film’s end-credits.

⁹⁰ Harvard School of Public Health, in its [2007 report to the MPA](#), cautioned: “Don’t ignore the issue or put a fig leaf on it, like a descriptor on DVDs, that would be the equivalent of the tobacco industry cynically putting smoking warnings on cigarette packages.”

⁹¹ MPA’s then-chairman, former-Sen. Chris Dodd, 16 April 2013, quoted in <https://www.usatoday.com/story/life/movies/2013/04/16/cinemacon-ratings-mpaa-nato-dodd/2088439/>.

dispense with PINS by using user profiles, which young viewers can freely switch between to view any material — obviating the parental controls.⁹²

Difficulty finding, setting, and using VOD parental controls may lower awareness of them and discourage their sustained use. In any case, the controls are only loosely connected to the MPA and TVPG rating schemes and not connected at all to the rating reasons; only Amazon’s keyword search feature lets consumers sort video titles by their rating code. No VOD parental controls let parents filter titles by specific rating reasons or content notifications.

Young audiences migrating to VOD are dangerously exposed | The entertainment industry’s self-regulation has failed to protect children and teens from hazardous exposure to onscreen tobacco imagery. Now, as film and TV audiences migrate from theaters, broadcast TV, and cable toward Internet-based VOD services, young viewers are encountering rising levels of smoking in both youth- and adult-rated film and video. At the same time, rating and content information has been degraded. As a result, parents are left to choose films or TV shows with no advance notice of their tobacco content and harm to young audiences: information consequential to a child’s wellbeing. Even the most robust parental controls that VOD services currently offer are largely unworkable, even for the best-informed parent.

The film and TV industries’ ratings and their implementation on VOD services are seriously flawed. These failures and the cumulative harm they cause are sufficient reason to fundamentally reform or totally replace the industries’ existing self-regulation schemes. But other effective remedies exist that are independent of ratings. The public health objective remains to permanently reduce young viewers’ exposure to onscreen tobacco content using evidence-based solutions. If the entertainment industry continues to be unwilling or unable to protect young viewers, broader public policy measures are in order, including but not limited to:

- federal regulation of Internet content that poses a compelling public health hazard;
- federal oversight of and industry accountability for all product placement and cross-promotion in all media productions accessible to young viewers;
- a ban on tobacco product placement and cross-promotion, in all media productions, by law;⁹³
- barring federal subsidies (including favorable tax treatment) and export assistance to U.S. media productions with tobacco content; and
- at the state level, making media productions with tobacco content ineligible for public subsidies, such as tax credits, favorable tax treatment, sales tax exemptions, and spending rebates.⁹⁴

⁹² Profiles are useful to companies because they can be used to harvest the individual usage data that drive personalized recommendations on the site and, possibly, targeted advertising on the company’s other channels.

⁹³ Domestic tobacco companies are currently prohibited from paid brand placement in entertainment accessible to young people by the [Master Settlement Agreement](#) with state Attorneys General in 1998 (see Section III(e)). Three trends between 1998 and 2020: (1) tobacco companies and their brands have consolidated into multinational entities, as has the entertainment business; (2) while tobacco brand display continues in film and video, tobacco incidents influential on youth are most often unbranded; (3) young audiences have migrated to media that are not effectively age-gated, making adult-rated film and TV programming even more accessible to them.

⁹⁴ States have awarded more than \$2 billion in subsidies to films and TV shows with tobacco content since 2010. See: <https://smokefreemovies.ucsf.edu/policy-solutions/end-public-subsidies>. Accessed 3/27/20.

In 1970, the U.S. Congress prohibited all tobacco commercials on FCC-regulated radio and TV, regardless of the time of day or the age of the program’s audience. Today, the fastest-growing part of the entertainment sector — Internet-based VOD, with no effective age-gates — transmits an increasing amount of tobacco imagery that has proved to be promotional and harmful. Films with smoking are seen many times more often on digital video services than in theaters (Figure 1). While more specific age-composition data is needed to make a conclusive determination, it is possible that the rapid expansion of online views of films with smoking and the ramping up TV-MA original shows with smoking have together canceled out or even reversed recent gains against exposure from youth-rated films in theaters.⁹⁵ Progress in reducing young people’s exposure to onscreen smoking, today, will be measured in how many fewer adults are addicted, disabled, and prematurely dead from tobacco diseases tomorrow. The remedies must match the seriousness of this persistent problem.

5 | RECOMMENDATIONS

5.1 | New works

Any film or TV program (“work”) with smoking⁹⁶ released on or after January 1, 2022, should be assigned the MPA’s R-rating (for theatrical films) or the TV Parental Guideline’s TV-MA rating (for TV programs), with a possible exception for (a) works that exclusively depict an actual historical person who actually used tobacco, not including any invented character or background actor, and (b) accurate portrayals of the serious health consequences of tobacco use and /or second-hand smoke exposure.

No tobacco brand names or trade dress should be depicted in any new work of any rating.

Credited producers of any film or TV program with tobacco imagery released in the U.S. on or after January 1, 2021, should provide a sworn declaration stating that no one associated with any phase of the production or distribution of the work, in any territory, entered into any agreement or accepted any consideration related to the inclusion of tobacco imagery in the work.

5.2 | New and existing works

Regardless of MPA or TV Parental Guidelines ratings, new works released on or after January 1, 2022, with any tobacco imagery, and existing works with any tobacco imagery first released on or after January 1, 2016, will include plain-language warnings in all distribution and promotion channels including, but not limited to, print and digital promotions and cross-promotions, such as, “Smoking on screen harms young viewers.” The warning must be effective and unconditional.⁹⁷ The warning should appear at every point of purchase and, online, with each instance of the work’s being promoted.

Films and TV programs with smoking of any rating, distributed on any platform, should be immediately preceded by a strong anti-tobacco spot of at least 30 seconds duration.

5.3 | Parental controls

As the World Health Organization has observed in its best-practice guidance, downstream solutions burdening consumers with the need to take protective action against onscreen smoking are no

⁹⁵ At 4.3 billion in 2019, in-theater tobacco impressions from top-grossing youth-rated films were 79% below their 2005 peak of 20.4 billion but 51% above their 2015 low of 2.9 billion, according to the Breathe California-UCSF Onscreen Tobacco Database. At 19.4 billion in 2019, R-rated impressions were at their highest level since at least 2002 and triple their 2015 levels.

⁹⁶ For definitions of “smoking,” “tobacco content,” and “tobacco imagery” in this section, see definition at Note 1.

⁹⁷ The phrase “Contains tobacco depictions,” currently deployed by Disney+, scores a Flesch Kincaid Grade Level of 17. “Smoking on screen harms young viewers” communicates the hazard and scores 2.5 (substantially more readable) on the same scale. (Test)

substitute for upstream solutions that incentivize producers, distributors, and carriers to permanently reduce toxic tobacco content in entertainment media accessible to young people, at the source.

That said, our survey of VOD parental controls shows that all companies cooperating in MPA and TV Parental Guidelines rating schemes should adopt a common parental controls user interface to be deployed on each of their platforms and connected devices, with the goal that parents only need to learn to operate parental controls functions and settings once. Each company should be responsible for securely managing account passwords, PINS, and technical interactions with their own platforms.

On or after January 1, 2022, any hardware or software parental controls tool should (1) enable an account holder to block works specifically on the basis of tobacco content (as defined in this report) regardless of rating, and (2) include an effective and unconditional plain-language warning, such as, “Smoking on screen harms young viewers.”

5.4 | Reporting

Starting January 1, 2022, all entities acting as the primary U.S. distributor of ten or more films and/or TV shows released on or after January 1, 2016, released on any platform, should publicly report (a) each title, first release date, theatrical and/or non-theatrical platforms, and MPA or TVPG rating; (b) the titles with tobacco imagery, if any; (c) total U.S. audience for each title to the end of the previous calendar year, and (d) anonymized age components of these audiences, beginning with but not limited to children 6-12 years, adolescents 12-17, and young adults 18-24.

Starting January 1, 2022, VOD services offering access to parental control tools should publicly report the number and share of their account-holders using the tools for 90 or more consecutive days of the previous calendar year.

The MPA should continue to make its rating records (“bulletins”) publicly accessible through its online lookup and download tool. On or after January 22, 2022, the TV Parental Guidelines should require anyone assigning its ratings to a TV program to report each assignment through an online interface and to make this data accessible to the public with a lookup and download tool.

Producer affidavits and data reports will be publicly accessible; copies will be maintained by an authority to be named.

Limitations | While we have comprehensive production, sales, and tobacco content data for domestic top-grossing feature films, publicly available information on streamers' many original productions (including full scripted series, limited series, and feature-length films given limited or no theatrical release) remains limited.⁹⁸ In-theater audience age-composition data and TV audience data (for broadcast, cable and some ad-supported video-on-demand [AVOD] and subscription video-on-demand [SVOD] services) are proprietary. For reasons of cost, these data were not acquired for this paper. Content, ratings, and parental control features were reviewed in the desktop browser versions of video-on-demand services and might vary in appearance on other devices.

Funding | This work was funded in part by Truth Initiative. The funder played no role in the conduct of this research or the preparation of this report.

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smokefreemovies.ucsf.edu

⁹⁸ Two pioneering published surveys are the 2018 and 2019 reports by Truth Initiative (Washington, DC).

Appendix A | Top-grossing films assigned an MPA “smoking” descriptor label, 2008-2019

	G			PG			PG-13			R			TOTAL		
	Films	Smoking	Labels	Films	Smoking	Labels	Films	Smoking	Labels	Films	Smoking	Labels	Films	Smoking	Labels
2008	9	0	0	19	5	1	77	50	5	42	32	0	147	87	6
2009	6	1	0	32	5	3	63	35	3	51	36	0	152	77	6
2010	3	0	0	32	4	3	53	23	3	48	34	0	136	61	6
2011	7	1	0	26	5	3	64	30	1	37	26	0	134	62	4
2012	5	0	0	23	3	1	61	30	6	53	40	0	142	73	7
2013	1	0	0	18	4	1	60	24	1	57	47	0	136	75	2
2014	2	0	0	24	3	1	61	28	3	44	27	0	131	58	4
2015	2	0	0	21	3	2	59	28	0	50	37	0	132	68	2
2016	0	0	0	25	1	0	66	23	3	50	33	0	141	57	3
2017	2	0	0	20	1	1	60	30	2	53	41	0	135	72	3
2018	0	0	0	23	3	0	61	23	2	52	36	0	136	62	2
2019	3	1	0	32	7	2	49	21	3	53	41	0	137	70	5
TOTAL	40	3	0	295	44	18	734	345	32	590	430	0	1,659	822	50

Appendix B | Media mix of VOD service offerings (February 2020)

	Films		TV		Orig.		% Films		% TV		% Orig.		TOTAL	
	Titles	Hours	Titles	Hours	Titles	Hours	Titles	Hours	Titles	Hours	Titles	Hours	Titles	Hours
Amazon	23,930	43,070	2,120	23,830	70	790	92%	64%	8%	35%	0.3%	1%	26,120	67,690
Apple TV+	0	0	0	0	20	130	0%	0%	0%	0%	100%	100%	20	130
CBS AA	50	90	70	730	10	120	38%	10%	54%	78%	8%	13%	130	940
Disney+	690	1,240	170	1,940	20	170	78%	37%	19%	58%	2%	5%	880	3,350
HBO Go	940	1,700	0	0	190	1,730	83%	50%	0%	0%	17%	50%	1,130	3,430
Hulu	1,200	2,160	1,370	15,410	60	650	46%	12%	52%	85%	2%	4%	2,630	18,220
Netflix	3,460	6,230	1,470	16,530	430	1,990	65%	25%	27%	67%	8%	8%	5,360	24,750
Starz	1,300	2,340	110	1,240	30	300	90%	60%	8%	32%	2%	8%	1,440	3,880
Xfinity X1	4,970	8,940	3,330	37,410	0	0	60%	19%	40%	81%	0%	0%	8,300	46,350
TOTAL	36,540	65,770	8,630	97,080	610	6,820	80%	39%	19%	57%	1%	4%	45,780	169,670

Media categories | (a) Films: feature length theatrical films licensed from other companies; (b) TV: series television licensed from other companies; (c) Originals: TV series and some feature-length films produced and/or distributed by a company related to the video-on-demand service. **Title census** | JustWatch.com, 20 Feb 2020, except CBS All Access and Xfinity X1 (counted in their online catalog pages). Film hours estimated as 108 minutes per film, the average length of 3,000+ films in the Breathe California-UCSF Onscreen Tobacco Database, 2002-2019. TV hours per title estimated as 1.5 seasons (15 episodes) posted per title X :45 avg. episode length. Results rounded to nearest 10.

Appendix C | Films receiving MPA ratings that include “teen,” “tweens” or “minors” in rating descriptors, with each film’s advertising tag line, 2018-2019

Film title	MPA rating with rating reasons	Advertising tag line
<i>Run the Race</i>	Rated PG for thematic content and some teen partying.	“The weight of the world. The love of a brother.”
<i>Little Women</i>	Rated PG for thematic elements and teen drinking.	“Own your story.”
<i>Status Update</i>	Rated PG-13 for crude and suggestive humor, language, and some teen partying.	“Imagine if every time you updated your status, your dream came true?”
<i>Seven in Heaven</i>	Rated PG-13 for crude sexual content, violence, language and teen partying.	“Play the game or it plays <i>you</i> .”
<i>Let It Snow</i>	Rated PG-13 for crude sexual material, strong language, and teen partying.	N/A
<i>The True Adventures of Wolfboy</i>	Rated PG-13 for mature thematic material, teen drinking, language, and some violence.	N/A
<i>Teen Spirit</i>	Rated PG-13 for some suggestive content, and for teen drinking and smoking.	“From the producers of <i>La La Land</i> .”
<i>Melt with You</i>	Rated PG-13 for teen partying, language, some suggestive material, and brief nudity.	N/A
<i>Canal Street</i>	Rated PG-13 for thematic elements including some bloody images, drug use and teen partying.	“Guilty until proven innocent.”
<i>Blockers</i>	Rated R for crude and sexual content, and language throughout, drug content, teen partying, and some graphic nudity.	“Teens out to have fun. Parents out to stop it.”
<i>Never Goin’ Back</i>	Rated R for crude sexual content and language throughout, drug use and brief nudity — all involving teens	“A screamingly funny tale of glorious idiocy.”
<i>Action Point</i>	Rated R for crude sexual content, language, drug use, teen drinking, and brief graphic nudity.	“From the star of <i>Jackass</i> ”
<i>Assassination Nation</i>	Rated R for disturbing bloody violence, strong sexual material including menace, pervasive language, and for drug and alcohol use — all involving teens.	“You asked for it, America.”
<i>Don’t Grow Up</i>	Rated R for disturbing violence, language throughout including some sexual references, and teen drug and alcohol use.	“Or you will die.”
<i>Saving Zoe</i>	Rated R for disturbing violence/rape, nudity, language, drug use, drinking, and brief sexuality — all involving teens.	“Her story will be told.”
<i>Skate Kitchen</i>	Rated R for drug use and language throughout, strong sexual content, and some nudity — all involving teens.	“So alive it pulses and breathes.”

<i>Waves</i>	Rated R for language throughout, drug and alcohol use, some sexual content and brief violence — all involving teens.	“The most stunning movie experience of the year.”
<i>The Valley</i>	Rated R for language, and some teen drug and alcohol use.	“The answer lies within.”
<i>Low Tide</i>	Rated R for language, some violence and teen drug use.	“Blood is thicker than water.”
<i>Mid90s</i>	Rated R for pervasive language, sexual content, drug and alcohol use, some violent behavior/ disturbing images — all involving minors.	“Fall. Get back up.”
<i>Juvenile Delinquents</i>	Rated R for pervasive language, violent content, sexual references, and some teen drinking.	“Nobody said teen vengeance would be painless.”
<i>No Manchas Frida 2</i>	Rated R for sexual content and teen drinking	“Paraíso Destruído.”
<i>Slut in a Good Way</i>	Rated R for sexual content, drug use, drinking, and language — all involving teens.	“Claim your freedom.”
<i>Giant Little Ones</i>	Rated R for sexual content, language and some drug/alcohol use — all involving teens.	“Love without labels. Live without regrets.”
<i>Share</i>	Rated R for some disturbing sexual content, teen drug/alcohol use, and for language.	“What is your privacy worth?”
<i>Good Boys</i>	Rated R for strong crude sexual content, drug and alcohol material, and language throughout — all involving tweens.	“You must be this tall to see this movie.”
<i>Booksmart</i>	Rated R for strong sexual content and language throughout, drug use and drinking — all involving teens.	“Getting straight A’s. Giving zero F’s.”
<i>Selah and The Spades</i>	Rated R for teen drug content, and language.	N/A
<i>Wildling</i>	Rated R for violence including bloody images, language, some sexual content and teen drinking.	“Discover your true nature.”
<i>Ma</i>	Rated R for violent/disturbing material, language throughout, sexual content, and for teen drug and alcohol use.	“Get home safe.”

Sources | Ratings from MPA weekly *Bulletins* numbered 2508-2610 (January 2018-December 2019). Advertising tag lines from film’s poster prepared by its distributor for U.S. theatrical or video release, if available (IMDb.com and other online sources). The table is ordered alphabetically by MPA rating text.

END