

LESSON PLAN

Level: Grades 11 to 12
About the Author: MediaSmarts

Violence on Television

Overview

To introduce students to the organizations of the Canadian broadcasting industry, and to the codes, guidelines and issues relating to violence in television and radio programming.

Learning Outcomes

Students will demonstrate:

- an understanding of the roles of the Canadian Association of Broadcasters (CAB), the Canadian Radio-television and Telecommunications Commission (CRTC), and the Canadian Broadcast Standards Council (CBSC).
- an understanding of the issues surrounding the depiction of violence on television, and the codes and guidelines used by the Canadian broadcasting industry to regulate violent content.
- an awareness of the procedures that have been established to receive and resolve consumers' complaints.

Preparation and Materials

- *The Players*
- *The CBSC Complaints Process*

The following handouts support this unit:

- *CAB Voluntary Code Regarding Violence in Television Programming*
- *Case Study Assignment Sheet*
- *You Be the Judge - CITY-TV re: Silence of the Lambs Case Study*
- *You Be the Judge - CITY-TV re: Silence of the Lambs Verdict*



Procedure

Guided Discussion

To ensure standards of quality and fairness, the *Canadian Association of Broadcasters (CAB)* has developed voluntary broadcasting codes as guidelines for radio and television stations across Canada. Although private broadcasters are self-regulating, they must adhere to the Violence Code, the Sex-role Portrayal Code and the *Broadcast Code for Advertising to Children* as a condition of licencing by the Canadian Radio-television and Telecommunications Commission. But who decides what the rules are, and how they should be interpreted? Let's look at the players in Canada's broadcasting industry.

- Place *The Players* transparency onto the overhead projector and discuss with class.

Now that we understand the three main players, let's take a look at the complaints process.

- Place the *The CBSC Complaints Process* transparency onto the overhead projector and discuss with class.

These are the players and the process, but it is the codes and guidelines that determine the decisions that are made regarding the broadcasting industry. It is *The Canadian Association of Broadcasters (CAB) Voluntary Code Regarding Violence in Television Programming* that is used to regulate violence in broadcasting.

- Distribute *CAB Voluntary Code Regarding Violence in Television Programming* to students.
- Once they have read the code, discuss it as a class. Ask students to think of examples for some of the points, especially those relating to children's programming, news and public affairs, violence against women and violence against specific groups).

Activity

- Distribute the *Silence of the Lambs Case Study* and *Case Study Assignment Sheet* to students, individually or in small groups.
- Students will have one or two classes to complete this assignment.
- Once students have completed their assignments, take up the CBSC *Silence of the Lambs Verdict* with the class.

Evaluation

- Completed *You Be the Judge* assignments



The Players in Canada's Broadcasting Industry

Canadian Radio-Television and Telecommunications Commission (CRTC)

The Canadian Radio-television and Telecommunications Commission (CRTC) is the federal government agency which regulates and supervises all sectors of the Canadian telecommunications and broadcasting system, including AM and FM radio, traditional television broadcasting, cable, and pay and specialty services.

The CRTC grants, amends and renews broadcast licences, monitors the performance of licencees (TV cable companies, cable and radio stations) and establishes broadcasting regulation and policy. The CRTC works closely with the industry the development of broadcasting standards regarding violent content, gender portrayal, cultural/minority rights, advertising and programs aimed at children.

The Canadian Association of Broadcasters (CAB)

The Canadian Association of Broadcasters (CAB) represents the majority of privately-owned, advertising-supported television and radio stations across Canada. It represents nearly 402 radio stations, 78 television stations and one network. The CAB keeps members abreast of changing technologies and new services, offers advice on technical, regulatory and advertising issues, works to improve the financial health of the industry, and presents the industry's position to governments, regulators and consumers. The CAB was founded in 1926.

The Canadian Broadcast Standards Council (CBSC)

The Canadian Broadcast Standards Council (CBSC) is an independent council created by the Canadian Association of Broadcasters (CAB) in 1990 to respond to public complaints about radio and television programming. The CBSC administers the voluntary broadcasting codes developed by the industry and informs broadcasters of trends in complaints. When complaints are lodged, the CBSC acts as the "middle-man" between the public and the broadcasting industry. For example, if a complaint is settled at the CBSC level, then it doesn't go on record at the station level. When problems cannot be resolved by the CBSC, the CRTC makes the final decisions - which will remain on record at the station level.

The CBSC has three principal objectives:

- to assist in the application of specific voluntary broadcast standards developed by the CAB.
- to provide a recourse for members of the public regarding application of these standards.
- to inform broadcasters of emerging societal trends (including developments in the codes and their administration) and suggest ways to deal with them.



Canadian Broadcast Standards Council (CBSC): Complaints Process

To register your complaint, write to:

Canadian Broadcast Standards Council (CBSC)
P.O. Box 3265, Station D
Ottawa, Ontario
K1P 6H8
Tel: (613) 233-4607 Fax: (613) 233-4826

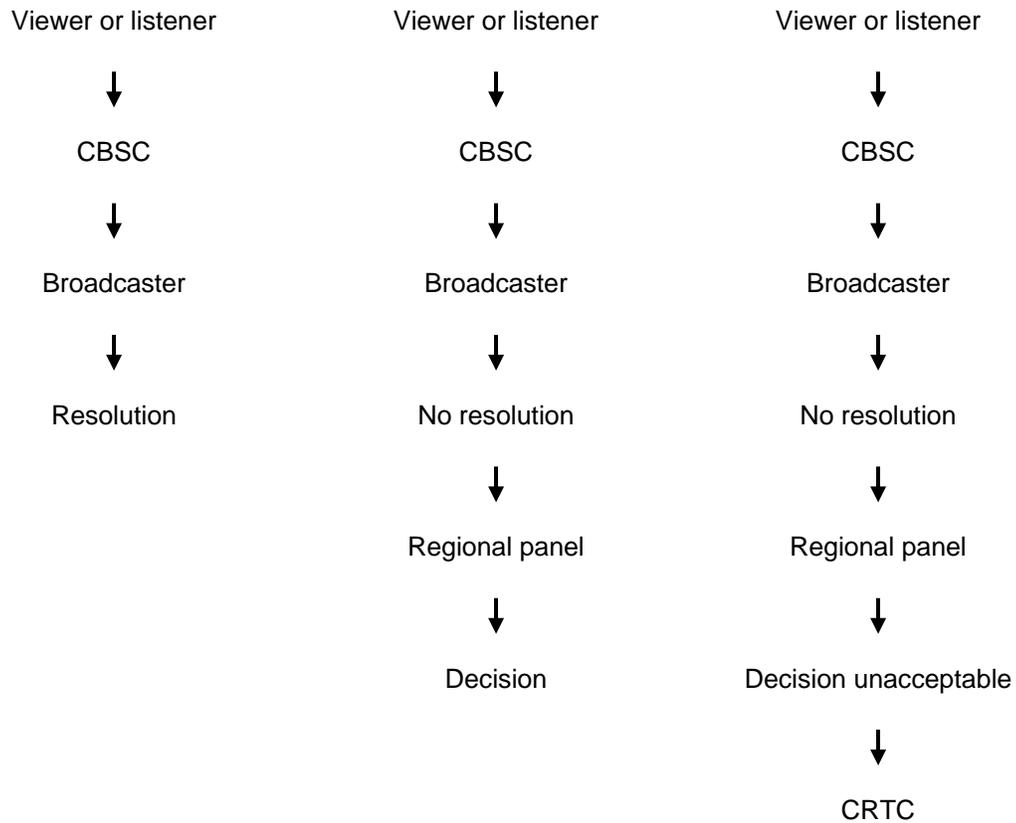
The CBSC also provides a complaints page on their Web site, at: <http://www.cbsc.ca/english/complaint/>.

What happens when you complain:

- When a viewer or listener complains to the Canadian Broadcast Standards Council (CBSC), the complaint is forwarded to the broadcasters concerned. Broadcasters are encouraged to resolve the grievance directly with the complainant. Most of the time matters are settled this way.
- If the broadcaster's response fails to satisfy the complainant, he/she may sign the "Ruling Request" form sent by the CBSC. By signing this form, the complainant asks the CBSC to refer the complaint to a Regional Panel.
- The CBSC will send the complaint letter, the broadcaster's response and a tape of the program to the appropriate Regional Panel. At its next meeting, the Panel will decide whether the broadcaster has contravened any of the Codes and whether the broadcaster's response was satisfactory. The CBSC will provide the complainant and the broadcaster with the full text of the decision. The decision is also posted on the CBSC Web site.
- If the Panel upholds the complaint, the broadcaster must announce the decision on air. If the decision is in the broadcaster's favour, the broadcaster need not air it; however, the CBSC releases all of its decisions to the national media.
- If the Regional Panel decision does not satisfy the complainant, the CRTC becomes the "court of last resort". Here are summaries of the three processes:



Here are summaries of the three processes:



If a complaint is satisfied during the first step of the process, the complaint will not appear on the public record of the broadcaster.



Canadian Association of Broadcasters (CAB): Voluntary Code

1.1 Canadian broadcasters shall not air programming which:

- contains gratuitous violence in any form*
- sanctions, promotes or glamorizes violence

(**Gratuitous* means material which does not play an integral role in developing the plot, character or theme of the material as a whole.)

2.0 Children's Programming

(Children refers to persons under 12 years of age)

2.1 As provided below, programming for children requires particular caution in the depiction of violence; very little violence, either physical, verbal or emotional shall be portrayed in children's programming.

2.2 In children's programming portrayed by real-life characters, violence shall only be portrayed when it is essential to the development of character and plot.

2.3 Animated programming for children, while accepted as a stylized form of storytelling which can contain non-realistic violence, shall not have violence as its central theme, and shall not invite dangerous imitation.

2.4 Programming for children shall deal carefully with themes which could threaten their sense of security, when portraying for example; domestic conflict, the death of parents or close relatives; the death or injury of their pets; street crime, or; the use of drugs.

2.5 Programming for children shall deal carefully with themes which could invite children to imitate acts which they see on screen, such as the use of plastic bags as toys, use of matches, the use of dangerous household products as playthings, or dangerous physical acts such as climbing apartment balconies or rooftops.

2.6 Programming for children shall not contain realistic scenes of violence which create the impression that violence is the preferred way, or the only method to resolve conflict between individuals.

2.7 Programming for children shall not contain realistic scenes of violence which minimize or gloss over the effects of violent acts. Any realistic depictions of violence shall portray, in human terms, the consequences of that violence to its victims and its perpetrators.

2.8 Programming for children shall not contain frightening or otherwise excessive special effects not required by the storyline.

3.0 Scheduling

3.1 Programming

3.1.1 Programming which contains scenes of violence intended for adult audiences shall not be telecast before the late evening viewing period, defined as 9 pm to 6 am.



3.1.2 Accepting that there are older children watching television after 9 pm, broadcasters shall adhere to the provisions of article 5.1 below (viewer advisories), enabling parents to make an informed decision as to the suitability of the programming for their family members.

3.1.3 In order to provide viewers with the benefit of Canadian program classification and viewer advisories not available on foreign distant signals, broadcasters who have CRTC-permitted substitution rights over programming which is imported into their markets before the late evening viewing period, may employ substitution, notwithstanding article 3.1.1.

3.1.4 Broadcasters shall exercise discretion in employing substitution in accordance with article 3.1.3 and shall at no time avail themselves of substitution rights over programming which contains gratuitous violence in any form or which sanctions, promotes or glamourizes violence.

3.1.5 Broadcasters shall take special precautions to advise viewers of the content of programming intended for adult audiences which is telecast before 9 pm in accordance with article 3.1.3.

(Note: To accommodate the reality of time zone differences, and Canadian distant signal importation, these guidelines shall be applied to the time zone in which the signal originates.)

3.2 Promotional material which contains scenes of violence intended for adult audiences shall not be telecast before 9 pm.

3.3 Advertisements which contain scenes of violence intended for adult audiences, such as those for theatrically presented feature films, shall not be telecast before 9 pm.

4.0 Classification System

4.1 Canadian broadcasters are in the process of co-operatively developing with other segments of the industry a viewer-friendly classification system, which will provide guidelines on content and the intended audience for programming.

Once complete, the classification system shall complement this Voluntary Code. As it is recognized that a classification system will have a bearing on program scheduling, the provisions of article 3.0 above shall be reviewed at that time.

5.0 Viewer Advisories

5.1 To assist consumers in making their viewing choices, broadcasters shall provide a viewer advisory, at the beginning of, and during the first hour of programming telecast in late evening hours which contains scenes of violence intended for adult audiences.

5.2 Broadcasters shall provide a viewer advisory at the beginning of, and during programming telecast outside of late evening hours, which contains scenes of violence not suitable for children.

5.3 Suggested language for suitable viewer advisories is outlined in Appendix A.

6.0 News & Public Affairs Programming

6.1 Broadcasters shall use appropriate editorial judgment in the reporting of, and the pictorial representation of violence, aggression or destruction within their news and public affairs programming.



6.2 Caution shall be used in the selection of, and repetition of, video which depicts violence.

6.3 Broadcasters shall advise viewers in advance of showing scenes of extraordinary violence, or graphic reporting on delicate subject matter such as sexual assault or court action related to sexual crimes, particularly during afternoon or early evening newscasts and updates when children could be viewing.

6.4 Broadcasters shall employ discretion in the use of explicit or graphic language related to stories of destruction, accidents or sexual violence, which could disturb children and their families.

6.5 Broadcasters shall exercise particular judgment during live coverage of domestic terrorist events or civil disorders, to ensure news coverage does not become a factor in inciting additional violence.

6.6 While broadcasters shall not exaggerate or exploit situations of aggression, conflict or confrontation, equal care shall be taken not to sanitize the reality of the human condition.

6.7 Broadcasters shall refer to The Code of Ethics of the Radio-Television News Directors Association of Canada (RTNDA) for guidance regarding broadcast journalism in general.

7.0 Violence Against Women

7.1 Broadcasters shall not telecast programming which sanctions, promotes or glamourizes any aspect of violence against women.

7.2 Broadcasters shall ensure that women are not depicted as victims of violence unless the violence is integral to the story being told. Broadcasters shall be particularly sensitive not to perpetuate the link between women in a sexual context and women as victims of violence.

7.3 Broadcasters shall refer to the Canadian Association of Broadcasters' code on Sex Role Portrayal for guidance regarding the portrayal of women in general.

8.0 Violence Against Specific Groups

8.1 Broadcasters shall not telecast programming which sanctions, promotes or glamourizes violence based on race, national or ethnic origin, colour, religion, gender, sexual orientation, age, or mental or physical disability.

9.0 Violence Against Animals

9.1 Broadcasters shall not telecast programming which sanctions, promotes or glamourizes violence against animals.

9.2 Broadcasters shall not be restricted in the telecast of legally sanctioned activities associated with animals. In such telecasts, judgment shall be used in the selection of video and associated audio, particularly if the telecast is broadcast outside of late evening hours.

10.0 Violence in Sports Programming

10.1 Broadcasters shall not promote or exploit violent action which is outside the sanctioned activity of the sport in question.

10.2 In sports programming which involves animals, broadcasters shall refer to Section 9.0 of this Voluntary Code.



You Be the Judge: Group Assignment

Group Assignment

You are members of the Board of Directors of the Canadian Broadcast Standards Council, attending your monthly Regional Council meeting. Today you must resolve the complaint that is before you. When making your decision, you must take the following into consideration:

1. The facts of the case: both the viewer's complaint, and the station's handling of that complaint.
2. Which codes and their subsections the complaint falls under.
3. Factors such as the content of the program, the context of the story, the time of day which the program aired.
4. Any other pertinent issues.

Your decisions must be submitted to the CRTC (your teacher) for final approval on the date we have discussed in class.

Decisions must be type-written, clearly stated and must address all aspects of the complaint.



You Be the Judge - CITY-TV re: Silence of the Lambs

The Facts of the Case

The complainant association wrote to the National Chair of the Canadian Broadcast Standards Council about the airing of the motion picture *Silence of the Lambs* on CITY-TV on February 19, 1995. The letter complained principally that the film depicted unacceptable violence against women and generally that "the subject matter, unspeakable horror and grotesque violence contained in *Silence of the Lambs*, makes it completely unsuitable for airing on a non-discretionary basis over our public airwaves."

The complainant association pointed out that the film "had [previously] been aired on Canadian pay-per-view discretionary channels" but its representative pointed out that she did not "appreciate having a movie about killing and skinning women delivered to [her] free over the public airwaves."

In the ordinary course, this complaint was forwarded by the CBSC to the broadcaster, whose Vice President of Programming responded to the complainant on March 13.

We have reviewed your letter with great interest because we share many of your concerns about violence in society and violence on television.

To put our telecast of this film in perspective, and to recap how we acted in a responsible manner, let me briefly review for you the handling of this feature film on CITY-TV.

This particular film was screened in its entirety by our Director of Programming Ellen Baine, by myself, and other senior management. In addition, on a consultative basis, our Citytv/MuchMusic Review Committee (primarily made up of non-programming women and men from the stations) was asked to comment on the film prior to telecast. We did this not for defensive reasons but to internally test our staff and management feelings about a telecast of this award-winning film. Everyone's comments were unanimous and supported a decision to air this film.

We chose to delay our normal 8 p.m. start time to a more appropriate 9 p.m. We chose to make significant edits in the film, either removing or reducing eight scenes for a total of about eight minutes. We chose to restrict any promotion of the film on air to an "after 9 p.m." timeslot. We ran special extended disclaimers at the start of the film and at each break. We kept our switchboard open to keep special track of any calls about the film. We also requested a simulcast on the film from cable companies in Southern Ontario indirectly ensuring that the CBS telecast of this film (they were playing this film on the same evening) was not seen by viewers in most of Southern Ontario. CBS let the film run almost uncut, editing only an estimated three minutes of material. Most viewers in Southern Ontario watched our more severely-edited version.

We acknowledge that this film contains potentially difficult material. We also acknowledge that it is one of the best films made in the last 10 years, having won Best Director, Best Film, Best Actor and Best Actress awards (among others) at the Oscars three years ago. This film has significant artistic merit and we make no apologies for its telecast.



We have been careful to track viewer response to this film. We have logged a total of 14 phone calls and letters. In every case viewers were upset, or extremely upset, at our "over editing" of the film. We have letters and calls using such phrases as "don't edit the movie" and "why did you ruin the show" as well as "we are sick of City's censorship". With the exception of your letter received from the CBSC, we have no recorded calls or letters complaining of our telecast of this film. We estimate total viewership of about 500,000 viewers to Citytv during this film.

...

You have disagreed with us on many programming decisions in the past. I hope we have at least in part, dealt with many of your concerns.

The response was not acceptable to the complainant association, whose representative requested that the complaint be taken to the Regional Council for adjudication. In her letter of March 18, she responded to CITY-TV's Vice President of Programming.

In this province, in which CITY TV broadcasts, Silence of the Lambs was given a Restricted rating by the Ontario Film Review Board and flagged with the following warnings:

BRUTAL VIOLENCE, HORROR, MAY OFFEND SOME

In Ontario, it is an offence under The Theatres Act, punishable by a significant penalty, for theatre owners to expose people under the age of 18, to films given a Restricted rating.

It is not a defence under this law for a theatre owner to say, as CITY TV has, well gee, we put off showing this Restricted film featuring BRUTAL VIOLENCE and HORROR from 8 p.m. until 9 p.m.; we all watched it first and thought it was great; we put viewer advisories on etc., etc., etc. In this province, we do not leave adherence to the film rating system to the discretion of corporations...

The letter went on to decry the broadcast of "films with wishy-washy viewer advisories which advise viewers of 'exactly nothing'." She noted that the advisories do not state that the movies have been given a Restricted rating in Ontario and should not be viewed by people under eighteen.

You Be the Judge - How will the CBSC resolve this matter?



Verdict: You Be the Judge - CITY-TV re: Silence of the Lambs

The CBSC considered the complaint under Articles 1 (Content), 3 (Scheduling), 5 (Viewer Advisories) and 7 (Violence against Women) of the *Canadian Association of Broadcasters Voluntary Code regarding Violence in Television Programming*, the texts of which read as follows:

Article 1.0 (Content), Voluntary Code Regarding Violence in Television Programming

1.1 Canadian broadcasters shall not air programming which:

- contains gratuitous violence in any form*
- sanctions, promotes or glamorizes violence

(*"Gratuitous" means material which does not play an integral role in developing the plot, character or theme of the material as a whole).

Article 3.0 (Scheduling), Voluntary Code regarding Violence in Television Programming

3.1.1 Programming which contains scenes of violence intended for adult audiences shall not be telecast before the late evening viewing period, defined as 9 pm to 6 am.

3.1.2 Accepting that there are older children watching television after 9 pm, broadcasters shall adhere to the provisions of article 5.1 below (viewer advisories), enabling parents to make an informed decision as to the suitability of the programming for their family members.

Article 5.0 (Viewer Advisories), Voluntary Code regarding Violence in Television Programming

5.1 To assist consumers in making their viewing choices, broadcasters shall provide a viewer advisory, at the beginning of, and during the first hour of programming telecast in late evening hours which contains scenes of violence intended for adult audiences.

Article 7.0 (Violence against Women), Voluntary Code regarding Violence in Television Programming

7.1 Broadcasters shall not telecast programming which sanctions, promotes or glamorizes any aspect of violence against women.

Conclusion

The Regional Council reviewed all the correspondence and watched an air-check tape of *Silence of the Lambs*. In other words, the Regional Council considered the film according to how CITY-TV had edited it for on-air use. While all members of the Ontario Regional Council recalled having seen the film at some time in the past in its uncut version, the members, for the purposes of this ruling, based their findings on the television version only. For the reasons given below, the Council unanimously agreed that the program did not violate any of the Codes referred to above.



Before dealing with the specific question of *Silence of the Lambs* and the CITY-TV broadcast of the film, the Council felt it important to deal with two threshold issues, namely, the underlying rationale for the Violence Code and the question of the relevance of theatrical classification to a television broadcast of any theatrical film.

The Balance between the Violence Code and Freedom of Expression

The Commission was generally satisfied that the CAB's Violence Code achieved the appropriate balance between preserving freedom of expression and protecting the viewing public - especially children - from the harmful effects of television violence.

In a previous case that dealt with the *Mighty Morphin Power Rangers*, the Regional Council was called upon to consider the special role of the Violence Code in the protection of children. In this case, the CBSC had to consider the "adult" provisions of the Violence Code. The general principle which guided the Code's creators - insofar as adults were concerned - was for "freedom of expression" would be the guiding rule for broadcasters, when it came to dramatic programming containing scenes of violence intended for adult audiences.

To this general principle of freedom of expression, they brought two general restrictions or constraints. The first was that there would be no broadcasting of programming containing scenes of violence intended for adult audiences before the so-called "watershed hour" (9:00 pm). The second constraint was that there would be no broadcasting to Canadians, even to the adult population, of programs containing *gratuitous* violence. In other words, all dramatic programming intended for adult audiences which aired in the proper part of the broadcast schedule, and which contained no gratuitous or glamorized violence, would be protected by this fundamental freedom enshrined in the Canadian Charter of Rights and Freedoms.

As a further service to Canadians, and in recognition of the fact that some viewers may be offended by some dramatic programming legitimately entitled to its place on the airwaves for reasons described above, the creators of the Code added the requirement that viewer advisories be added in certain cases. In the "Background" section preceding the provisions of the *CAB Violence Code*, it is provided that "creative freedom carries with it the responsibility of ensuring ... that viewers have adequate information about program content to make informed viewing choices based on their personal tastes and standards."

The Role of Theatrical Classification

No one ought to confuse the theatrical classification of any film with the entitlement of that film to be aired on television. Theatres and television operate under different constraints. Theatrical films are as long as the producers, distributors and exhibitors wish them to be. Television programming must generally fit into 30, 60 or 120 minute slots. Once begun, a theatrical film runs without interruption until the final credits are concluded. A television film is interrupted by commercials, bumpers and periodic station identification. The shape and content of a theatrical film may vary until the director, producer(s), financiers and distributor have "locked" it, but television networks - if not stations - have always reserved for themselves the right to cut a theatrical film to conform to time and content requirements. Long before the *CAB Violence Code*, broadcasters determined that certain violent, sexual, and coarse language scenes would require editing for use on the airwaves.



The fact, therefore, that a motion picture may or may not have had a particular rating in its cinema incarnation has little or nothing to do with its entitlement to appear on conventional television stations. It cannot be assumed that it is the theatrical version which appears on television. In fact, it can probably generally be assumed that a film with a restricted rating will not appear on conventional television in its original form.

The Watershed Hour

It is undisputed that CITY-TV's broadcast of *Silence of the Lambs* took place following the 9:00 pm watershed hour, thus in conformity with the scheduling requirements of the *Violence Code*.

Gratuitous or Glamorized Violence

Canadian broadcasters cannot, at any time of the day or night, air programming which contains gratuitous violence or which "sanctions, promotes or glamorizes violence".

Gratuitous violence is defined by the Code as being "material which does not play an integral role in developing the plot, character or theme of the material as a whole." Where, in other words, a program includes scenes of violence which are unnecessary to the progress of the story, which do not drive the plot forward, which play no role in the development or definition of the characters and are clearly serving a sensationalistic purpose, that program will be seen to contain gratuitous violence.

Programming which "sanctions, promotes or glamorizes violence" is, with the possible exception of the meaning of "sanctions", more straightforward. While the Council understands that the verb "sanction" may have several meanings, an ordinary rule of interpretation would give it that meaning which is consistent with its accompanying verbs "promotes or glamorizes" and not a meaning which differs from those. The applicable meaning in the *Oxford English Dictionary* would be: "to permit authoritatively; to authorize; in looser use, to countenance, encourage by express or implied approval." The dictionary provides a similar definition for "promote": "to further the growth, development, progress, or establishment (of anything); to help forward (a process or result); to further, advance, encourage." "Glamorize" is presumably a slang corruption of "glamour" and does not make it to the *Oxford Dictionary*, but we all would likely understand from the use of all three verbs that the use of "glamorize" here means to encourage, if not glorify, the use of violence. The CBSC does not expect that any use of violence in programming will offend the Code but only that which encourages violence in the sense of the quoted phrase.

The foregoing descriptions will always need to be measured against the content of a challenged program and the Council expects that these general terms will only come to be fully understood when sufficient examples will have been considered.

It was the view of the Ontario Regional Council that the broadcast version of *Silence of the Lambs* neither contained gratuitous violence nor sanctioned, promoted or glamorized violence.

The film could be characterized as a psychological thriller; it tells the story of an imprisoned serial killer, a sociopathic psychiatrist, Dr. Hannibal Lecter, nicknamed "Hannibal the Cannibal." Through a young special agent, Clarice Starling, the FBI attempts to enlist his brilliant yet deviant mind to identify another sociopathic serial killer nicknamed "Buffalo



Bill." Since the film deals with the sociology of serial killers - one in prison for much of the film and one at large - it would be fair to assume that there is much tension and suspense which is, after all, the constant threat of imminent violence. Although the viewer learns of murders which have previously been committed, the only homicides seen to occur during the film are those connected with the escape of Lecter from custody. There is also a kidnapping and, ultimately, the shooting of Buffalo Bill by Special Agent Starling. The Council did not consider that the film was afflicted by considerable violence. It also viewed the violence present as integral to the development of plot and character.

Given that the violence in the film is all perpetrated by unattractive sociopathic characters, the Council did not consider that there was any glamorization of violence in *Silence of the Lambs*.

Violence against Women

It was the contention of the complainant that the film "is about a serial killer who abducts, kills and then skins women. ... Edits for television will not change the concept on which this film is based -killing and skinning women."

This was not the Regional Council's view of the film. It considered that *Silence of the Lambs* had a much broader, albeit disturbing, theme. The movie was concerned with the psycho pathology of serial killers and, to some extent, the exorcising of the personal demons of Special Agent Starling. Of the two serial killers in the film, one killed only men and the other, the lesser role, had killed a man and thereafter women. The violent acts depicted were no more, and possibly less, focused on women than on men.

Furthermore, the Regional Council was not unaware of the characterization of the principal protagonist in the film, Clarice Starling. It was she, and she alone, who solved the case and saved the day. She was initially introduced to viewers as a double major in psychology and criminology, a magna cum laude graduate, a summer intern at the Reisinger Institute and so on. She is the only figure to merit the respect and admiration of the brilliant, but sociopathic, Hannibal Lecter. Starling is in fact presented in striking counterpoint to the mindless herd of male agents, SWAT teams and all, who head off to the wrong city to arrest the wrong persons while she endures the terror of the final moments in the pitch dark with Buffalo Bill, advantaged in the contest by his night piercing goggles.

Viewer Advisories

Viewer advisories are required at the beginning of and during the first hour of a film shown after 9:00 pm. CITY-TV went further than required. The film was preceded by both an oral and a written advisory. The oral advisory stated: "The following movie contains some scenes of violence and mature viewing matter. Viewer and parental discretion is advised." The written advisory, present at the beginning and during every commercial break for the full duration of the film (exceptionally, two hours and fifteen minutes), read: "VIEWER AND PARENTAL DISCRETION IS ADVISED."

It was not necessary for CITY-TV, for reasons explained above, to state, as the complainant requested, that the movie had "been given a Restricted rating in Ontario and should not be viewed by people under eighteen." The information required for a cinema-goer is not necessarily that required for a television viewer and the Ontario theatrical rating was not, in any case, given to the film shown on CITY-TV, but rather to a different, unedited version.



The CITY-TV Response to the Complainant

In addition to its review of the code provisions, as always, the Regional Council considered the adequacy of the broadcaster's response to the complainant. The Council's reconciliation mandate, as established in the CBSC Manual, has been considered and reaffirmed on numerous occasions by the British Columbia and Ontario Regional Councils.

This is not the first complaint brought by this complainant against this broadcaster. It does not make the complaint any less valid. Indeed, the complaints have tended to raise important issues for consideration. Nonetheless, the broadcaster has a duty to be responsive to even a militant viewer. In this regard, the Council believed that its remarks on this point in CITY-TV re: *Beavis & Butt-head*, (CBSC Decision 93/94-0074, June 22, 1994) were apt:

It is, therefore, encouraging that the vast majority of complaints which the CBSC refers to the broadcasters for response are satisfactorily resolved at that level between the broadcaster and the complainant. Of those few which remain unresolved at the "grass roots" level, it is often clear in the review of the correspondence that the territory staked out by some complainants is unlikely to permit reconciliation despite the care taken in the broadcaster response. In such cases, the Council is acutely conscious of the broadcaster's effort or lack of effort to be responsive to the issues raised in the complaint.

In the present case, the Regional Council considers the response of CITY-TV's Program Manager to the complainant to be a thoughtful and attentive answer to the issues raised by the complainant association, despite the strong negative reaction by the complainant to that response.

It was the view of the Regional Council in this case that the response of CITY-TV's Vice President of Programming was equally thoughtful and attentive despite the fact that it was equally unlikely to strike a responsive chord. It acknowledged that the film contained "potentially difficult material." It also explained the station's internal process in deciding that the film could play and its special arrangements set up to track viewer reaction to the film. Despite its contention that this complaint was the only one which decried the telecasting of the film, the Vice President took the time to reply carefully. That action is to be commended.

