



PBS Underwriting Guidelines

The need for underwriting guidelines for on-air disclosure of sponsors of national PBS programs came about with the licensing by the FCC of the Public Broadcasting Service (PBS) as a national broadcaster. The FCC stated that all funders of public television programming must be identified on-air, but because of the noncommercial nature of public television, advertising would not be acceptable. In order to comply with these mandates, underwriting guidelines were developed for the identification/recognition of corporate, foundation and government entities. Over the years the PBS Underwriting Guidelines have evolved and the look of the on-air identifications has matured, from simple billboards with the underwriter's name and logo to fully produced, enhanced on-air messages or spots.

However, the original premise remains the same – “that the noncommercial character of public broadcasting is protected and preserved.” On-air spots targeted to adult audiences are governed by guidelines as follows:

III. Guidelines for On-Air Underwriting Credits

Once an underwriting arrangement has been approved, the next step is to review and approve the proposed on-air credit that will identify the underwriter(s). This section sets forth the rules applying to credit content, duration and placement.

RULE 1 Overall Appearance and Effect of Credits

The on-air appearance and overall effect of each credit and credit sequence must be in keeping with the noncommercial nature of public television.

FCC Requirements: From the FCC's standpoint, the purpose served by underwriting credits is to identify the funder in the interests of full disclosure, not to promote the funder or its products and services. At the same time, however, the FCC has indicated that it will rely on the good faith determinations of public broadcasters in interpreting the FCC's noncommercialization guidelines.

A. Underwriter Name or Logo

All underwriters must be identified in video by their name and/or logo. If a logo by itself does not adequately disclose the identity of a funder, then the funder's name must be stated in audio or video. An underwriter may not be anonymous.

B. Additional Identifying Information in a Credit

Besides identifying the funder clearly by name and/or logo (as required above), a credit may contain additional information in audio, video, or both, to help identify a funder. Any language that in PBS's judgment is gratuitously or blatantly promotional is not acceptable. In addition, information that would appear to be self-congratulatory or that could be construed as an advocacy position on a particular issue or subject will not be acceptable.

FCC policy statements, rulings, advisory opinions and letters applying its rules and policies to specific underwriting announcements have cautioned against the use of certain types of language, phrases, and visuals, such as the following, which it deems promotional:

- call to action (e.g., “come in today and take a test drive
- superlative description or qualitative claim about the company, its products, or its services (e.g., “the most intelligent car ever built”)
- direct comparison with other companies, or with other companies' products or services
- price or value information (e.g., “only \$160 down and \$160 per month,” or “7.7% interest rate available now,” “affordable,” “discount,” or “free”)

- inducements to buy, sell, rent, or lease (e.g., “six months’ free service when you buy,” or “guaranteed for life”)
- endorsements (e.g., “recommended by 4 out of 5 doctors for headache pain”)
- demonstrations of consumer satisfaction.

Some of the words and phrases that the FCC has found unacceptably promotional include:

Efficient	Economical	Dependable
Dedicated	Prompt	Fair price
Reliable	Excellent	Leading
Luxury	Quick and clear	Very accommodating
Delightfully honest	Quality	Number One

The context in which the word or phrase appears must always be taken into account and a separate judgment must be made for each credit. The line separating permissible from impermissible, in wording and visuals, is not always a bright one.¹ Accordingly, PBS retains the authority to interpret language and other elements for purposes of compliance with FCC requirements and toward maintaining our own uniquely noncommercial service.

The following types of additional identifying information are acceptable, according to FCC statements concerning enhanced underwriting announcements:

- Value neutral descriptions of a product line or service
- Brand and trade names and product or service listings
- Visual depictions of specific products
- Location information, including telephone numbers and Web addresses
- Logograms or slogans which identify and do not promote²

C. Other Factors to be Considered

Inevitably, no set of specific rules or guidelines will anticipate every use or possible combination of creative elements that constitutes an underwriting credit or sequence of credits. In evaluating a proposed underwriting message, PBS will consider FCC decisions as well as elements of the creative content which can affect the overall tone and character of an underwriting announcement, such as:

- music
- number and speed of video cuts
- voice quality and inflections
- verbosity
- “dwelling” on product features
- primary emphasis³

In general, a corporate, institutional, or “image” spot may be more easily adaptable than other types of spots for a PBS underwriting message. Messages that seek primarily to promote public television generally or align with the PBS mission are encouraged. In any event, in reviewing proposed underwriting messages, PBS may suggest appropriate revisions and shall have final judgment regarding acceptability.

¹ A more complete discussion of applicable federal statutes and FCC regulations is available on request.

² Slogans or corporate positioning statements are evaluated in the same way as any other additional identifying information. The degree to which a slogan is an established part of an underwriter’s identity will also be taken into account.

³ In some cases, the sequence of certain visual or audio elements may impermissibly tip a message in a promotional direction, and PBS may suggest re-ordering certain elements for a more appropriate result.



PBS Kids Underwriting Guidelines

Underwriting credits designed and intended to be appealing to audiences under twelve (12) years of age must comply with the following rules. These rules may also apply to special versions of children's programs distributed by PBS in other dayparts. The credit may include a brief, generic, value-neutral description of the underwriter's product or service.

The credit may use the underwriter's logo in video, and may also for further identification include a brief depiction of the underwriter's mascot or spokescharacter to accompany the funder name or logo. To avoid encouraging children to use or consume an underwriter's products, product depictions are not allowed; further, an underwriter's name or logo may not be shown on a product package.

The remainder of the underwriting credit should be either (1) a message of support for PBS and public television, or (2) a message that promotes learning and education. Examples:

"Microsoft Home supports The Magic School Bus and other programs that further learning, exploration and discovery."

"Exercise your head. Read! Ghostwriter is brought to you in part by Nike."

"Reading Rainbow is made possible in part by a grant from Kellogg's, who reminds you to take time each day for reading."