PBS FUNDING STANDARDS & PRACTICES

2018



The Public Broadcasting Service (PBS) Funding Standards and Practices articulate the core principles that ensure the noncommercial nature of all content distributed by PBS. These standards rest on three fundamental tenets:

- **1.** PBS must protect its credibility and integrity by ensuring the editorial independence of all content from funders and the transparency of its funding sources;
- **2.** PBS is committed to fully complying with federal law and regulations related to funder acknowledgments on noncommercial public television stations; and
- **3.** PBS's noncommercial mission and status are essential to its independence and trustworthiness, and must be vigilantly preserved.

Because it is not possible to anticipate every circumstance relating to funding arrangements or the creative aspects of a funder acknowledgment, these standards are intended to be illustrative rather than exhaustive. PBS will continue to carefully consider innovative ideas to maximize funder support, while also preserving its noncommercial nature. These standards are applied to all content distributed nationally by PBS; local member stations may adopt individualized standards at their discretion. When in doubt about how best to interpret or apply these standards, please contact PBS Standards & Practices at standards@pbs.org.

I. DISCLOSING FUNDERS

Funders of PBS content cannot be anonymous. Federal law requires that broadcasters "fully and fairly disclose the true identity" of all funders.¹ The purpose of this requirement is to be fully transparent with the audience. While this legal requirement is limited to broadcast programming, PBS ensures transparency by requiring that funders be disclosed for PBS content distributed on all platforms, including online videos, mobile applications, and PBS websites.

PBS defines a funder as any third-party donor (e.g., corporation, foundation, or private individual) that has made a financial contribution to support: (1) the production or acquisition of specific content distributed by PBS; (2) the research and development for that content; (3) the packaging or repackaging of that content; or (4) the program service through which that content is distributed.

Entities that regularly produce content (such as public television stations, commercial production companies, and international broadcasters), and that finance their own productions in whole or in part (or their affiliated entities) are not funders. These entities are regarded as "producers" or "co-producers." Likewise, entities regularly engaged in the distribution of content are not funders; such entities are regarded as "distributors." Any such entities must be reported to PBS and credited appropriately, pursuant to the PBS Producer's Handbook.

¹47 C.F.R. § 73.1212(e); see also 47 U.S.C. § 317. When a pass-through entity contributes funding on behalf of another individual or organization, then the original source of funding must be treated as the funder and the pass-through entity is credited as a "fiscal agent."

²The PBS Co-Production Guidelines separately address the acceptability of various producers and co-producers.

Each potential funder must be evaluated by PBS to ensure there is no editorial influence or perceived connection to editorial content.³ Any agreement by PBS, PBS Foundation, or a producer to distribute content or accept funding is contingent upon this evaluation. To ensure expeditious review, producers must provide PBS with the following information to the extent available for each proposed funder:

- the funder's legal name and physical address, as well as web address if available;
- the amount of financing provided by the funder and its percentage of the content's total production budget;
- a description of any relationship between the funder and the content's subject matter, the production process, or the producers;
- any arrangements by the funder for ownership or control of the content's copyright or ancillary rights and products, such as online program distribution rights or foreign distribution rights; and
- any arrangements by the funder for the provision of in-kind goods and services or any other consideration.

Specific guidelines tailored to the disclosure of various categories of funders are as follows:

- Individuals. All individuals who provide funding, including through crowdfunding campaigns, must be identified to PBS by their legal name (not a pseudonym or online username).⁴ Producers should make this requirement clear at the outset of any crowdfunding campaigns to ensure that funding is not raised from anonymous contributors.
- Corporate Divisions and Subsidiaries. If funding comes from a corporation's bona fide operating division or subsidiary with independent budgeting and decision-making authority, that division or subsidiary may be identified as the funder without identifying the parent corporation.
- Brand Names. Established brands that are not corporate entities (for example, "Jell-O" is a brand owned by Kraft, "Crest" is a brand owned by Procter & Gamble) may be identified as funders if the corporate owner is also fully and clearly disclosed. However, individual products or product lines may not be identified as funders (such as "Crest 3D White Toothpaste").
- Endowments, Trusts, and "Friends of" Initiatives. Third-party endowments, program-specific trusts, or other "friends of" initiatives that provide funding may be identified as funders. Public television station endowments should be identified as funders only if there is a clear and direct connection between the endowment and the specific content being funded.
- Foundations. Many foundations feature specific grant programs (e.g., Ford Foundation's JustFilms grant). When content receives funding from such a grant, the grant may be identified as a funder provided that the foundation is also fully and clearly disclosed.

³ PBS does not evaluate the renewal of an existing funder for the same series, provided that the material terms of the funding arrangement are unchanged (e.g., the connection between the funder's interests and the content).

⁴See Addendum A(5) (detailing the process for publicly identifying only major funders specifically and the remainder generally).

⁵This can be accomplished, for example, by briefly displaying the parent company's name or logo at the bottom of the screen near the beginning of the funding credit.

II. EVALUATING FUNDER ACCEPTABLITY

While financing from funders is critical to support the production of high-quality educational content, PBS will not accept funding that could compromise the editorial credibility or integrity of the content. To preserve the public's trust, PBS applies two tests when evaluating the acceptability of every proposed funder: the Editorial Influence Test and the Perception Test.

A. EDITORIAL INFLUENCE TEST

Content distributed by PBS should be produced with the highest ethical, journalistic, and professional standards in accordance with the PBS Editorial Standards and Practices. Content must be responsive solely to the needs of the public—not to the interests of funders. No funder may influence, or have the right to influence, content. For this reason, PBS will not accept content if a funder is able to provide editorial input. In determining compliance with this prohibition, PBS evaluates whether the funder is able to:

- participate in the production process after the initial conceptual stage is complete;
- specify in any detail what the content is about;
- direct the conclusions or opinions of the content;
- provide input on scripts, outlines, rough cuts, or fine cuts prior to distribution by PBS;
- appoint or approve experts to be interviewed or advisors to provide guidance about the content's development;
- influence or contribute to decisions about the scheduling of content for PBS distribution; or
- control distribution of the content.

While these particular factors are indicative of impermissible editorial influence, other contextual factors may also be relevant in any given instance. Each situation is unique and requires a specific analysis by PBS.

In general, a funder may communicate an interest in broad concepts or proposals that it might wish to fund. For example, a potential funder could indicate its interest in funding content on the performing arts or, more narrowly, modern dance—provided, of course, that the content does not serve the funder's business or other interests.

B. PERCEPTION TEST

To preserve the public's trust, PBS also must guard against the potential perception that a funder has exercised editorial influence, even if no such influence occurred. For this reason, PBS will not accept content if it determines that the audience might reasonably conclude that PBS has compromised its independence or professionalism to a funder. The perception of editorial influence can include a funding arrangement that, on its face, appears so self-serving that the audience might readily assume that the primary purpose of the content is to promote the funder's products, services, or other interests.

In determining whether the audience might reasonably believe that a funder has exercised editorial influence, PBS first evaluates whether there is a connection between the products, services, or interests of the funder and the subject matter of the content.

If there is any such connection, then PBS will evaluate whether:

- the connection is incidental to the subject matter of the content;
- the content is part of a continuing series or based on a book that has an established reputation with viewers for independence and integrity;
- the funder seeks to fund an entire series or only select episodes in an ongoing series;
- the content was produced before or after the funding relationship was established;
- the proposed funder is one of many or joined with neutral funders so that it is a minority rather than majority funder; or
- disclosure language is added to the content to make clear that the perceived problematic funder had no editorial involvement in the content.

The presence of one or more of these factors may mitigate the potential perception that a funder exercised editorial influence. No one factor is necessarily determinative, however, and other factors may be relevant depending on the circumstances. The potential perception that a funder may have exercised editorial influence is of heightened importance when the content involves news, public affairs, or controversial subject matter.

Copyright, Ancillary Rights, and In-Kind Goods/Services: Editorial influence, or the perception of editorial influence, can also include a producer's arrangements with funders or other entities, regarding control of the content's copyright, ancillary rights, or in-kind goods and services. Producers must disclose any such arrangements for consideration by PBS under the above tests.

C. CATEGORY RESTRICTIONS

In addition to the above tests for evaluating funder acceptability, PBS reserves the right to decline any proposed funder or funding credit that does not align with PBS's public service mission. The following general restrictions apply to certain classes of funders, products, and services:

- Competitors. Funding credits from other media organizations will be evaluated based on the credit's overall potential impact on PBS's brand and mission.
- Distilled Spirits, Firearms, Nicotine, and Controlled Substances. PBS does not accept funding credits that depict
 or reference distilled spirits, firearms, any tobacco or other nicotine-delivery products, and any drugs
 classified under Schedule I of the Controlled Substances Act. Funding credits from diversified companies
 engaged in the manufacture of such products may be acceptable, provided that the credit makes no
 reference to such products.
- Food and Beverages. PBS is committed to fostering the health, well-being, and nutritional values of children. As such, PBS applies a higher standard of review to funding credits from food and beverage companies for content directed at children.⁶
- Gambling. While a casino may be a funder, PBS does not accept funding credits that depict or reference lotteries, gambling, or other games of chance. For instance, a funding credit may identify a casino as a concert venue or dining establishment.

- Personal Products. PBS evaluates funding credits that feature adult personal products on a case-by-case basis, subject to a general "waist-to-knee" prohibition.
- Politics. PBS cannot accept funding credits that support or oppose any candidate for political office.⁷
- Public Importance or Interest. PBS cannot accept funding credits that express views with respect to any matter of public importance or interest.⁸
- Sectarian Themes. PBS is committed to providing a nonsectarian educational programming service. For this
 reason, PBS does not accept funding credits that proselytize to the audience or that have the function or
 purpose of advancing or propagating a particular religious belief or doctrine. PBS may, at its discretion, accept
 funding credits of a general nature for religious organizations or the sale of products with religious themes.
- Violence or Sexual Themes. PBS may reject a funding credit or require edits if it contains violent or otherwise graphic, explicit, sexual, or offensive content that is determined to be incompatible with PBS's public service mission.

All federally-regulated products and services that appear in funding credits (e.g., prescription drugs, financial services, and dietary supplements) must comply with all applicable regulations. PBS reserves the right to reject funding credits related to products or services that have been the subject of significant litigation or government enforcement actions.

III. EVALUATING FUNDER ACKNOWLEDGMENTS

If a funder is approved pursuant to Section II above, PBS next must review and approve the credit that will identify the funder. This section sets forth the rules that apply to the contents of funding credits. PBS strongly encourages producers to provide scripts and storyboards to facilitate discussion before a funding credit is produced.

Additional procedures for video funding credits are set forth in Addendum A, and additional procedures for website banner funding credits are provided in Addendum B, both of which may be updated as the media landscape and distribution platforms evolve over time.

A. CONTENTS OF FUNDER ACKNOWLEDGMENTS

PBS is legally obligated to ensure that the content of funding credits on broadcast programming is only for identification purposes. While promoting the funder's company, products, or services is prohibited, the Federal Communications Commission allows a funding credit to include some descriptive information aside from the funder's name. PBS and other public broadcasters are expected to "make reasonable good faith judgments as to whether [funding credits] identify rather than promote."

PBS applies its reasonable good faith judgment when evaluating proposed funding credits for all distribution platforms—including online videos, mobile applications, and PBS websites. In doing so, PBS takes into account evolving digital platforms and audience expectations for each platform. For example, when there is ambiguity about the potentially promotional nature of a funding credit that will appear on digital platforms, PBS takes a moderately more permissive approach than for broadcast.¹⁰

⁷⁴⁷ U.S.C. § 399b(a)(3).

^{8 47} U.S.C. § 399b(a)(2).

⁹ Commission Policy Concerning the Noncommercial Nature of Educational Broadcasting Stations, Public Notice, FCC 86-161, 7 FCC Rcd. 827 (1986). See Section III.A.3 (providing examples of promotional language).

¹⁰ For example, PBS may permit an imperative that is not directly a call to action or an adjective that is not definitively qualitative, provided such language is not closely linked to the funder's products, services, or company

PBS also takes into account the non-profit status of funders when resolving ambiguity about the potentially promotional nature of proposed funding credits.

PBS does not permit the use of program hosts or characters in any broadcast funding credits. On all other platforms, PBS evaluates the use of program hosts and characters in funding credits on a case-by-case basis, accounting for unique platform-specific circumstances and audience expectations.¹¹

Credits that seek primarily to endorse public television generally or align with PBS's public service mission are strongly encouraged. Research demonstrates that PBS's audience expects funding credits to be more understated, subdued, and respectful than advertising on for-profit media platforms.

1. Funder's Name or Logo

All funders must be clearly identified. While a logo may be used to identify a funder, the funder's name must be included in text if a logo by itself does not adequately disclose the funder's identity.

To ensure that funders are clearly identified, video funding credits that are longer than 15 seconds should include an early visual identification. This can be accomplished by briefly displaying a logo or text with the funder's name at the bottom of the screen.

2. Acceptable Information

Aside from clearly identifying the name of the funder, a funding credit may contain additional identifying information, provided that such information is not promotional, self-congratulatory, or expressing views on a matter of public importance or interest.

The following identifying information is acceptable and complies with FCC regulations:

- non-promotional, value-neutral descriptions that identify the funder and its products or services;
- brand and trade names, as well as brief product or service listings;
- visual depictions of specific products;
- duration of time in business;
- informational imperatives that direct the viewer to a source for additional information (e.g., "learn more at...");
- location information (including either a telephone number or web address, and either a hashtag or an online username/handle) that identifies and does not promote; and
- identifying logograms, organizational slogans or taglines, and mission language.¹²

¹¹See Section III.B.1 (explaining host selling rules specific to children's content).

¹² The degree to which an organizational slogan or tagline is an established part of a funder's identity will be taken into account, including, for example, how long the language has been in use, the ubiquity of the language, and whether the language is registered as a trademark with the U.S. Patent and Trademark Office. The language should accompany the funder's name; it may not be incorporated into the body of the spot's copy.

3. Unacceptable Information

Promotional language is unacceptable. The factual veracity or truth of a statement in a funding credit is irrelevant as to whether it is promotional. PBS cautions against use of the following information, which is specifically deemed promotional:

- Calls to action such as "pick up the phone now," "come in today," and "order now." Implicit calls to action such as "Are you ready to buy a house? Want to know if you qualify?";
- Qualitative language about the funder or its products and services, such as: beautiful, cold, dependable, easy, economical, efficient, excellent, fast, flexible, gentle, high-end, inviting, luxurious, prompt, refreshing, reliable, revolutionary, soft, specialized, state-of-the-art, timeless, and trusted;
- Comparative language about the funder or its products and services, such as: best, better, easier, exclusive, hottest, larger, largest, latest, more, most, only, unique, and voted #1;
- Comparisons to other companies or other companies' products or services, to the funder's own products or services, or to industry standards, including any award or prize mentions (e.g., "five-star safety rating" and "Academy Award nominee") and implicit comparisons (e.g., "There are times we don't know who to trust. You can trust [funder]");
- Price or value information, such as: affordable, discount, free, savings, and "3.7% interest rate available now";
- Inducements to buy, sell, rent, or lease, such as: "guaranteed for life," "six months' free service when you buy," reward programs, sweepstakes, and warranties;
- Endorsements or testimonials, such as "recommended by 4 out of 5 doctors for headache pain," and product reviews by any third party;
- Depictions of customers' apparent satisfaction with the funder's products or services, or credits that feature customers' approving responses; and
- Excessively detailed listings of the funder's products or services, such as "custom metal roofing, siding, hardware, trim, insulation, trusses, and perma felt paper."

4. Contextual Factors

Context is essential in evaluating funder acknowledgments because there is often no fixed or bright-line rule for when language is promotional. No set of specific rules can anticipate every use or possible combination of creative elements. As such, PBS must exercise its discretion when considering precedent and evaluating the acceptability of proposed funding credits.

In evaluating a proposed funding credit, PBS will consider creative elements that impact the credit's overall tone and character. These contextual factors include the number and speed of video cuts, voice quality and inflection, music, verbosity, dwelling on product features or piling on with repeated language, identifying a product or service through a problem-solution setup, directly addressing the viewer, the use of celebrities, and the sequence of audiovisual elements that could make a message impermissibly promotional.

B. CHILDREN'S CONTENT

PBS believes that children are a special audience with fewer critical reasoning skills and greater vulnerability, and PBS is committed to providing a safe haven for children, free from the influence of commercial messaging. As such, funding credits must assiduously avoid exploiting young viewers in any way. The following additional restrictions apply to children's content on all platforms, including the 24/7 multicast channel, mobile applications, and classroom services.

1. Host Selling

Host selling is the use of program characters or show hosts to sell a funder's products or services. To avoid taking advantage of the trust that children place in the hosts and characters of PBS children's content, PBS prohibits host selling on all distribution platforms by funders of content intended for use in educational settings or by children ages 12 and under.¹³

2. Brands and Products Appealing to Children

Funding credits on content intended for children ages 12 and under that involve brands or products appealing to children must not include any product depictions or show the funder's name or logo on packaging. These funding credits may include a brief, neutral descriptor of the funder's product or service, as well as a brief depiction of the funder's mascot or spokescharacter. These funding credits should also include either: (1) a message of support for PBS or public television; or (2) a message that promotes learning, education, or healthy activities. Examples of acceptable language include:

- When you grow up with imagination, you can grow up to be anything. That's why The Rite Aid Foundation, through its KidCents program, supports kids in neighborhoods like yours, and why we're proud to support Daniel Tiger's Neighborhood.
- Build-A-Bear celebrates creativity and imagination and is proud to support PBS KIDS.
- Early learning is a journey. When we join our children on that journey, we all tap into wonder. Curious World app-based learning, proud to support PBS KIDS.

This restriction does not apply to funding credits where the product or service is of no interest to children and the message is solely aimed at adults.

3. Food and Beverages

On content intended for children ages 12 and under, PBS applies a higher standard of review to funding credits for food and beverage companies, brands, or trade associations. PBS undertakes the holistic evaluation of product lines to determine potential funder acceptability.

Following the recommendations of a federal interagency working group on marketing food to children,¹⁴ PBS requires that:

¹³ Children's Television Report and Policy Statement, 50 FCC 2d 1, 16-17 (1974); Children's Television Obligations of Digital Television Broadcasters, 19 FCC Rcd. 22943, 22960-62 (2004).

¹⁴ See Interagency Working Group Proposal on Food Marketing to Children, *Food For Thought, Proposed Nutrition Principles for Marketing Foods to Children* Ages 2-17 (2011).

- Foods must make a meaningful contribution to a healthful diet and should contain at least one of the following food groups: fruit, vegetables, whole grains, fat-free or low-fat milk products, fish, extra lean meat or poultry, eggs, nuts and seeds, or beans.
- Foods should minimize the intake of nutrients that could have a negative impact on health or weight. The key standards are:
 - Saturated Fat: 1 gram or less per serving and 15 percent or less of calories
 - Trans Fat: 0 grams per serving
 - Added Sugars: 13 grams or less per serving
 - Sodium: 210 milligrams or less per serving¹⁵

C. HOW-TO CONTENT

Because how-to content frequently includes references to consumer products (such as food items, gardening, and building products and implements), funding credits must not depict products that would create a promotional connection with this content.

The gratuitous inclusion of a funder's products or services within how-to content, absent any compelling editorial reason for doing so, also must be avoided. Producers do not need to substitute a competitor's products for those of a funder, but producers must use care to ensure that any appearance of a funder's products is, at most, incidental.

IV. ACKNOWLEDGING IN-KIND CONTRIBUTIONS; NO PRODUCT PLACEMENT

Producers must actively avoid incorporating or featuring a product or service within PBS content in a promotional manner, i.e., product placement. Products and services (especially those of a funder or in-kind contributor) should only be included or referenced in a manner that is reasonably related to their necessary use within the content. Lingering or gratuitous—as opposed to incidental or fleeting—depictions or mentions of a company's logo or products are not permitted.¹⁶

Producers may receive a product or service for free or at a reduced price, which producers may use in an incidental manner within content. In the interest of transparency, such an arrangement needs to be disclosed to viewers. If no consideration was provided and the product or service was purchased by the producer at market rates, then no disclosure is necessary.

Any such disclosure credit should specifically identify the product or service provided by the company. At a minimum, producers should disclose that the product or service was "furnished" or "paid for," either in whole or in part, by the company. This credit should appear within the normal production credits using the same style, font, color, and background.

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¹⁵ These requirements may be adjusted over time based on prevailing industry standards.

¹⁶ For example, fleetingly showing a manufacturer's logo on a sewing machine used by program hosts on a show involving the manufacture and design of clothing would be acceptable. However, dwelling on the manufacturer's logo is not reasonably related to the hosts' use of the sewing machine and would not be acceptable.

¹⁷ 47 C.F.R. § 73.1212(a)(1); 47 U.S.C. § 399b.

Addendum A | Procedures for Video Funding Credits

(1) Placement

At a minimum, all original funders of video content must be acknowledged in the plain text of production credits to ensure that there is sufficient disclosure across platforms and over time. These original funders should be listed after the creative credits, but before the production statement and copyright information. If content does not have production credits on certain platforms, then funders should be identified in plain text beneath the video on any platforms that allow for this option.

In addition, producers may elect to acknowledge all funders in a more prominent manner through standalone funding credit "pods." These pods must be clearly distinguishable from editorial content and must not interrupt regular programming. Funding credit pods must appear during natural breaks, generally at the beginning and end of programs, subject to the following specific restrictions:

- Opening and Closing. PBS requires producers to: (a) place opening funding credit pods at the beginning of the program or immediately after a brief opening program tease in order to avoid interrupting the content; and (b) place closing funding credit pods at the end of content, as close to the production credits as feasible. To minimize commercialism concerns, funding credit pods should be placed only at the end of content that is intended primarily for use in educational settings (such as PBS LearningMedia).
- Mid-Break. Mid-break funding credit pods must be used sparingly to preserve PBS's noncommercial character and to comply with federal law. Mid-break funding credit pods are generally prohibited, without a waiver, on all programs that are 60 minutes or shorter. For longer programs, PBS may allow mid-break funding credit pods in rare instances during natural breaks (such as concert intermissions) at approximately 60-minute intervals.

With prior approval from PBS, producers may also acknowledge funders in embedded promotional material and next-time teases. Such acknowledgements are limited to major series funders (at a financial threshold set by PBS) and must always remain a secondary element to the primary purpose of promoting viewership for PBS content.

(2) Duration

The duration of funding credit pods on video content varies by platform, so as to align with audience expectations, while always preserving PBS's noncommercial mission and character.

 Standard Broadcast. Standard funding credits on broadcast programs must be no longer than 15 seconds per funder, and the total duration of a standard funding credit pod must not exceed 60 seconds (including the introductory language described in Section 4 below).

¹⁸ 47 U.S.C. § 399a; Public Broadcasting Amendments Act of 1981, H.R. Rep. No. 97-82, at 24 (1981). Federal regulations require that funders be identified at both the start and end of broadcast programs involving discussion of a controversial issue of public importance. 47 C.F.R. § 73.1212(d).

- Premier Broadcast. For major funders who meet a monetary threshold set by PBS, PBS will consider individual premier credits of up to 30 seconds per funder on a case-by-case basis for broadcast programs.¹⁹ In such circumstances, the total duration of a funding credit pod acknowledging all funders must not exceed 95 seconds, and the total portion of the funding credit pod that may acknowledge corporate funding support must not exceed 65 seconds.
- Educational Video Content. For content intended primarily for use in classrooms or other educational settings, the total duration of all funding credits must not exceed 15 seconds.
- Full-Length Digital Video. For full-length digital video content (e.g., the complete episode of a program), the total duration of all funding credits must not exceed 45 seconds.²⁰ In the interest of transparency, and where applicable, all original funders should be identified in the text of production credits, in plain text beneath the video, or in a metadata field.
- Digital Video Excerpts. Promotional clips and clips of excerpted program segments that are 30 seconds in length or less must not include funding credits (except in rare instances with prior approval from PBS, such as when federal regulations require acknowledgment of a federal grantor agency). Producers may elect, but are not required, to include funding credits on longer clips. For clips that are longer than 30 seconds but shorter than three minutes, the total duration of funding credits must not exceed five seconds. For clips that are three minutes in length or more, the total duration of funding credits must not exceed 35 seconds. Additional restrictions may apply depending on the rules set by the social media platform where the clips appear.

(3) Order

When video content is funded by more than one funder, the funders generally should be listed in descending order of support, with the largest funder appearing first, regardless of category (e.g., corporate, government, foundation). When two or more funders provide equal funding, producers may determine which funder appears first. For ongoing series, funders who support a particular episode should generally be listed first, followed by series funders. In certain circumstances, subject to review by PBS Standards & Practices, it may be appropriate to vary the order of funders. In such circumstances, producers should strive to avoid any confusion between major and minor funders.

(4) Introductory Language

Funding credit pods that accompany video content must contain clearly identifying introductory language, also known as a preamble. Such language must not imply a commercial or editorial interest by the funders. Examples of acceptable language include:

- "This program was made possible (in part) by ..."
- "Funding for this program was provided (in part) by ..."
- "Major funding for this program was provided by ... Additional funding was provided by ..."
 [when there is a significant difference in the amount of funding from two or more funders]

¹⁹ Premier credits are not available for PBS KIDS content. Premier credits may not consist of two 15-second spots. Further details about premier credits are available by contacting PBS Standards & Practices at standards@pbs.org.

²⁰ This includes up to 15 seconds for acknowledging funders within the full-length digital video and up to 30 seconds for acknowledging funders in a "pre-roll" credit before the video begins, as further detailed on the Digital Sponsorship producer exchange.

The words "in part" should be used when production costs are only partially covered by funders and the balance is assumed by the producer of the program so as to avoid any misimpression that the program was funded in its entirety by the funders. PBS Standards & Practices will evaluate alternative introductory language on a case-by-case basis.

(5) Number of Permissible Funders

There is no limit on the number of funders that may contribute to content. If there are more funders than can reasonably be conveyed to the audience in the time available (e.g., crowdfunding campaigns), then the producer should identify the major funders individually and the remainder generally, with a statement advising the viewer that a complete funder list is available.²¹ An example of acceptable language for this purpose is: "And others. A complete list is available from PBS." The full list of approved program funders will be made available to member stations by PBS to address viewer inquiries. Producers are also encouraged to make the full list of funders available online.

(6) Funding from PBS and the Corporation for Public Broadcasting

Content funded wholly or partly by PBS must include a "Viewers Like You" acknowledgment at the end of the funding credit pod. 22 Similarly, programs with CPB funding must identify the Corporation for Public Broadcasting in the funding credit pod. Please see the PBS Producer's Handbook for specific guidance on creating these credits.

²¹ Commission Policy Concerning the Noncommercial Nature of Educational Broadcasting Stations, 90 FCC 2d 895, 901 n.18 (1982).

 $^{^{22}}$ This acknowledgment need not appear in the production credits, unlike other funders per Addendum A(1).

Addendum B | Procedures for Website Banner Funding Credits

Website banner funding credits will be evaluated according to all of the standards above, along with the following additional requirements:

(1) Placement and Design

Funding credits that appear as banners on PBS webpages, mobile applications, and other digital platforms should appear in designated display units in accordance with the PBS Digital Sponsorship Display Requirements. These credits should not be designed to appear as content, to mislead the user in any way, or to interfere with the user's ability to access content. These credits also must not include strobing or flashing effects; pop-up, pop-under, or other distracting animation; and audio or video that begins without the user's initiation or does not stop at the user's request. In addition to, or in lieu of, banners, funding credits can also appear as static logos or text at the perimeter of PBS webpages (i.e., the top, bottom, or side columns).

(2) Explanatory Language

Explanatory text should appear near banner funding credits, such as "Support provided by," along with a link to "Learn More" or "Learn About Sponsorships" that directs users to a webpage determined by PBS. If producers include static funder logos or text at the perimeter of the webpage as described above, then introductory language is required, such as "Funding provided by."

(3) Privacy

Funders may only use data obtained through visitors' use of PBS.org and related links in a manner that is consistent with the PBS Privacy Policy.