

Woodhull Response to Federal Communications Commission's (FCC) Media Bureau Request for Comment: "Further Empowering Parents To Protect Their Children And Make Informed Choices About The TV Programs Their Children Watch"

Woodhull Freedom Foundation is a national organization dedicated to defending and protecting sexual freedom as a fundamental human right. Woodhull protects individuals' rights across the United States to enjoy sexual dignity, privacy, and consensual sexual expression without societal or governmental interference, coercion, or stigmatization. In carrying out this work, we defend the rights, health, and safety of LGBTQIA+ young people. It is in this capacity that **we submit this comment to strongly oppose** changes to the TV Parental Guidelines age ratings system overseen by the TV Oversight Management Board as described in this [request for comment from the Federal Communications Commission](#) (FCC).

Woodhull raises serious concerns with the Federal Communications Commission's expressed rationale in seeking comments under the premise of "empowering parents to protect their children." In the request for comments, the FCC alleges that, "parents have raised concerns that controversial gender identity issues are being included or promoted in children's programs without providing any disclosure or transparency to parents." The FCC goes on to claim that, "industry guidelines that parents rely on are rating shows with transgender and gender non-binary programming as appropriate for children and young children, and doing so without providing this information to parents, thereby undermining the ability of parents to make informed choices for their families."

Given the lack of accurate information presented as justification for this harmful law, it is clearly evident that this request for comment is part of the well-documented federal government's broader campaign to target and harass transgender, non-binary, and gender expansive people under the guise of "protecting children". Throughout both of President Trump's administrations, he has used his authority to relentlessly attack transgender, non-binary, and gender expansive individuals. We are deeply disturbed by the FCC's attempt to further President Trump's cruel assault which could lead to broad censorship of media accurately reflecting people's gender in all its diversity. This type of government overreach is unconstitutional and represents a grave threat to First Amendment Free Speech protections.

The FCC's focus on alleged "controversial gender identity issues" is also reflective of discriminatory language in a January 2025 Executive Order from the White House, which erases transgender, nonbinary, and gender expansive people from public life by making it the United States' policy to recognize only two sexes, male and female. The recognition of only two sexes is not only scientifically inaccurate but extremely harmful to the mental and physical

well-being of gender diverse individuals. This is all part of a nationwide assault on trans people that is so dire that the Lemkin Institute for Genocide Prevention and Human Security has warned that **policies targeting transgender people in the United States are indicative of the early stages of genocide.**

Our opposition to changes to the TV Rating System is informed by these wide-sweeping attacks on LGBTQIA+ people and sexual freedom more broadly and by irrefutable facts about sexual orientation and gender identity, which we have exhaustively researched as part of our [Fact Checked by Woodhull series](#). In this series, we address the reality that LGBTQIA+ people are at extreme risk for harassment, discrimination, and violence, with current laws not sufficiently protecting LGBTQIA+ people's rights.

We include here a brief excerpt from our Fact Checked by Woodhull series, which addresses [the reality of sex and gender](#):

“Sex and gender are complex and exist on a spectrum, yet society often creates narrow rigid categories that fail to reflect this diversity. These restrictive categories can cause harm by excluding and shaming anyone who exists outside of these lines, especially transgender and intersex people. Being forced into categories that do not align with identity can cause discrimination and violence in families, healthcare, and social systems. This can have serious long-term emotional and physical consequences for individuals who are outside of these lines. For example, transgender youth reported significantly increased rates of depression, suicidality, and victimization compared to their cisgender peers. These are often accompanied by struggling with belonging in school, family issues, and internalized self-stigma.”

We also highlight findings from our Fact Checked series on how [LGBQ+ representations in school and media are crucial to creating safer and more inclusive communities](#). These findings demonstrate that the FCC's basis for this request for comment is not informed by facts but is part of a long history of biased, inaccurate, and highly discriminatory beliefs about LGBTQIA+ people being overtly sexual and a threat to children. We are disturbed that the FCC would perpetuate such harmful myths about LGBTQIA+ people. The reality is that accurate and diverse representations of LGBTQIA+ people in media and school do not pose a danger to children as described below:

“Not only does research suggest that age-appropriate LGBQ+ material is safe, but the data also shows that exposure to such content can promote stronger communities, increased open-mindedness, and positive feelings towards queer people and other minority groups. In schools, LGBQ-inclusive curriculum is associated with overall safer environments in the school setting, including lower levels of bullying and increased feelings of safety for all students.”

It is imperative that the FCC and all federal government policies accurately represent the complexities of sex and gender in all its diversity. Woodhull therefore calls on the FCC to reject any proposed changes to the TV Parental Guidelines age ratings system which would cruelly target and further marginalize transgender and non-binary young people.

We include in this comment PDFs of Woodhull publications, which provide accurate language that should be used in public policy related to gender and sex:

- [Sex and Gender Are Not The Same](#)
- [Transgender People Are Not a Threat to Public Safety](#)
- [Representation of LGBTQ+ People Does Not Hurt Children](#)

Sincerely,



Ricci Joy Levy
President & CEO
Woodhull Freedom Foundation