



November 1, 2007

**VIA FAX AND EMAIL**

Mr. Donald S. Clark  
Secretary of the Commission  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.,  
Washington, D.C. 20580

Dear Secretary Clark,

I am contacting you on behalf of Common Sense Media Inc. and the families we represent. Common Sense is the nation's leading nonpartisan organization dedicated to improving the media lives of children and families, and we have worked with the FTC over the past few years on issues related to media violence and children.

As you are probably aware, Rockstar Games' ultra-violent video game, "Manhunt 2," is available starting this week in retail stores throughout the United States. This extremely violent video game was recently banned in the U.K., but is available today in the U.S. carrying an "M" ("Mature") rating.

In June 2007, the original version of "Manhunt 2" was given an "AO" ("Adults Only") rating in the U.S. by the Entertainment Software Rating Board ("ESRB"), and it was banned in the U.K. by the British Board of Film Classification ("BBFC"). In connection with the BBFC's initial decision to ban the game, the Director of the BBFC, David Cooke, stated:

Manhunt 2 is distinguishable from recent high-end video games by its unremitting bleakness and callousness of tone in an overall game context which constantly encourages visceral killing with exceptionally little alleviation or distancing. There is sustained and cumulative casual sadism in the way in which these killings are committed, and encouraged, in the game.

Take Two then submitted a revised version of the game to the ESRB and to the BBFC. On August 24, 2007, after reviewing the revised version, the ESRB lowered the game's rating from "Adults Only" to "Mature." On October 8, 2007, however, the BBFC banned the revised version of the game. Commenting on the Board's decision not to lift the ban after reviewing the revised version, the BBFC's Director echoed his previous comments, stating:

We recognise that the distributor has made changes to the game, but we do not consider that these go far enough to address our concerns about the original version. The impact of the revisions on the bleakness and callousness of tone, or the essential nature of the gameplay, is clearly

insufficient. There has been a reduction in the visual detail in some of the “execution kills,” but in others they retain their original visceral and casually sadistic nature. We did make suggestions for further changes to the game, but the distributor has chosen not to make them, and as a result we have rejected the game on both platforms. The decision on whether or not an appeal goes ahead lies with the distributor.

From everything we know, the revised version of the game that remains banned in the U.K. is the version that was released with an M-rating in the U.S. today. The original, unedited version was recently leaked onto the Internet, and a media report has suggested that thousands of people have downloaded it.

Take Two has specifically indicated that the leaked version, although downloadable, is playable only on an illegally modified PlayStation, and that some of the gruesome scenes, including a scene depicting the decapitation of a police officer, have been removed from the new M-rated version. Images from the original unedited version, however, have appeared on the Internet and are readily accessible. Someone is apparently playing the original version and disseminating screen shots, which Common Sense was easily able to obtain.

Our organization does not know precisely what the differences are between the original and revised versions of the game, though we are in the process of reviewing the M-rated version of the game, but the *New York Times* reported on Monday of this week that “the redacted version coming to market this week with a rating of M for Mature . . . seems to retain at least 99 percent of the original content.” Rockstar Games claims that in addition to excising some material from the game, it has made other changes, including modifications to the visual effects.

Given this context as well as the volumes of scientific research relating to video game violence and its impact on young people, we are contacting you today to lodge a formal complaint and to seek the FTC’s investigation of the entire ratings process as well as the release of “Manhunt 2.” Specifically, we request that the Commission investigate:

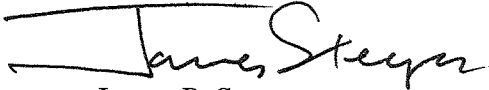
- (1) The fact that the original, unedited version of the game—and gruesome images contained therein—can be downloaded online, a fact we believe has serious implications for the overall ratings and release process for these types of games in the future; and
- (2) Why the edited version of the game was given a reduced rating in the U.S. even though the apparently same (or substantially similar) version is banned in the U.K. for all audiences.

We believe that the FTC’s own studies on media violence and children make this an issue worthy of immediate investigation. Earlier this year, the Commission’s report, *Marketing Violent Entertainment to Children*, found that nearly 60 percent of kids under 17 say they are sometimes allowed to play M-rated games. The same report also suggested that underage children can purchase M-rated games more than four out of ten times. In addition, research studies have clearly demonstrated that exposure to violent media—violent video games, in particular—leads to aggressive behavior in children and teens. Many leading researchers and doctors believe that violent video games train children to believe that violence is an acceptable and effective means to resolving conflicts and

achieving one's goals in life.

Our focus at Common Sense Media is to inform families, educators and young people about the media's impact on children, and we are particularly concerned about material that we believe can be damaging to young people's health and well-being. We believe that an investigation into the ratings process and the availability of the unedited version of "Manhunt 2" on the Internet is in the best interest of American families and children, and we look forward to your response.

Sincerely yours,

A handwritten signature in black ink that reads "James Steyer". The signature is written in a cursive style with a horizontal line above the name.

James P. Steyer

CEO, Common Sense Media

Cc: Deborah Platt Majoras, Chairman of the Commission  
Keith Fentonmiller, Division of Advertising Practices