



NATIONAL CENTER ON SEXUAL EXPLOITATION

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February 15, 2017

Mr. Brian L. Roberts, Chief Executive Officer
Comcast Corporation
1701 JFK Boulevard
Philadelphia, PA 19103

RE: Comcast 2017 Dirty Dozen List Notification

Dear Mr. Roberts:

We are writing to express our deep concern regarding the distribution and sale of hardcore, adult pornography via Comcast's xfinity video-on-demand and premium channel services. We ask that you take immediate action to stop distribution of hardcore pornography. Further, with respect to its ISP services, we request that Comcast adopt the "opt-in" model recently implemented by Sky Broadband, UK. Comcast's current ISP model requires that customers wishing to block hardcore material jump through complicated filtering hoops. However, the "opt-in" model requires that those customers wishing to view hardcore pornography online "opt in" to access such sites, while other customers automatically receive their Internet free from sexually exploitative material.

Very soon, the National Center on Sexual Exploitation (NCOSE) will publicly announce its annual "Dirty Dozen List" which names major mainstream promoters of sexual exploitation and pornography in America. Comcast was previously named to this list in 2013. After careful consideration, we have decided to include Comcast on the 2017 Dirty Dozen List.

In a letter dated March 17, 2016, we appealed to you to take action to remove hardcore pornography from Comcast's xfinity offerings, both as a matter of conscience, and because the material being distributed likely violates U.S. law, 18 U.S. Code Section 1468, which prohibits distribution of obscene matter by means of a cable or subscription services on television. But no such action has been taken by Comcast.

As the following sample of hardcore pornography titles offered by Comcast xfinity demonstrates, themes of incest, racism, sexism, prostitution, and exploitation are commonplace:

- **Friends & Family 3**
It's a wild family affair when the Stone family starts dating the Smiths.
- **Daddy's Girl Gone Wild!**
Abella Danger confesses to her stepfather that she likes sex. What to do when your bratty little stepdaughter needs your attention?

- **Amateur Babes: Tight & Wet**
Young and untamed, these fresh new faces cannot wait to get dirty for the first time! You won't be able to peel your eyes off these babes.
- **Smokin' Hot All Girl Rug Munching Ho's**
Don't miss these hot girls playing on a second story balcony having a party that leads to lust and getting hot.
- **Bound by Desire Act 2**
Horny hotties like Allie Haze get kinky.
- **1st Time Orgasms: Dirty Sex Toy Time!**
Ladies play with toys.
- **Hot & Wet Amateurs: Ready to Climax.**
Thar she blows!
- **White Girls Making Daddy Mad**
Oh yeah, here's the girl that really wants to make her daddy mad. She's doing all that taboo stuff that really lights his hair on fire.
- **1st Time Lesbo Bangin' MILF**
Horny MILFs munch on hotties.
- **Ho's Bangin' Hos: Girls Do It Better**
These gals do guys for cash, but for pleasure, it is only their BGGs. They take the cash and run and party with their gal pals
- **All Girl Sex: Strap on Fun**
Hotties use strap-ons in these steamy scenes.
- **Tight Horny Amateurs: Wet Finger Fun**
Lusty amateurs get off.
- **Horny Housewives: Hot & in Heat**
These lusty ladies of the house are looking for some neighborhood meat.
- **Bent Over Babes: Tight & Wide Open**
Hotties get what they crave in carnal action.
- **My Horny Lesbo Wife Craves Young Coeds**
Desperate lesbian housewives on the prowl.
- **Young Studs Bang Hot MILFs**
Seasoned MILFs bedded by young bucks.

- **Girls Gone Wild: Dormroom Hookups**
Campus hotties blow off steam in the dorm.
- **Amateur Virgins: Ready to Orgasm**
Amateur babes desperate for a go.
- **Virgins No More: Wide Open for Sex**
Late-blooming babes finally get broken in.
- **Doing White Girls**
What are we doing here: White girls just the way you like them: big, bad and thick.

Additionally, Comcast provides dozens of titles via its Playboy subscription, 24 via Vivid, 25 Hustler films, and 30 titles through TEN subscription. All in all, by one review conducted in April 2016, there were 515 X-rated offerings on xfinity/Comcast.

Our society is struggling to cope with the impacts of multiple forms of sexual abuse and violence: child sexual abuse (which is 167 times more common than autism),¹ adult sexual exploitation,² racially-motivated sexual violence,³ sexual assault on college and university campuses,⁴ sexual trafficking of women and children,⁵ and incest⁶ to mention a few. These problems have not emerged from a vacuum but flourish within the context of unprecedented access to hardcore pornographic material. Adult, hardcore pornography—with its raw, brutal, debasing, violent and hate-filled themes—exacerbates the deeply entrenched social ills mentioned above and unleashes devastating impacts at the individual and societal level.

¹ U.S. Department of Justice. “The National Strategy for Child Exploitation Prevention and Interdiction: A Report to Congress, (August 2010), <http://www.justice.gov/psc/docs/natstrategyreport.pdf> (accessed February 2, 2017); National Coalition to Prevent Child Sexual Abuse and Exploitation, “Facts for Prevention: The Health Impact on Children & Youth,” (January 2011), http://www.preventtogether.org/Resources/Documents/Health_Impact_on_Youth.pdf (accessed February 4, 2017).

² Bryce Covert, “Women in Baltimore Public Housing Were Forced to Trade Sex for Basic Repairs.” *Think Progress* (January 9, 2016), <http://thinkprogress.org/economy/2016/01/09/3737612/baltimore-housing-sex-settlement/> (accessed February 4, 2017); Melissa Farley and Anne Cotton, et al. “Prostitution and Trafficking in Nine Countries: An Update on Violence and Posttraumatic Stress Disorder.” *Journal of Trauma Practice* 2, 3/4 (2003): 33-74.

³ Victoria Olive, “Sexual Assault against Women of Color.” *Journal of Student Research* 1 (2012): 1-19; Gabby Bess, “Notre Dame Tutor Accused of Forcing Student into ‘Racially Motivated’ Sex.” *Broadly*, (November 2, 2015), https://broadly.vice.com/en_us/article/notre-dame-tutor-accused-of-forcing-student-into-racially-motivated-sex (accessed February 4, 2017); Associated Press, “Keller Teen Accused of Racially Motivated Sexual Assault of Teammate in Idaho High School Football Locker Room” (May 25, 2016), <http://sportsday.dallasnews.com/high-school/high-schools/2016/05/25/texas-teen-accused-racially-motivated-sexual-assault-teammate-idaho-football-locker-room> (accessed February 4, 2017).

⁴ The White House Council on Women and Girls. *Rape and Sexual Assault: A Renewed Call to Action*, (2014), https://www.whitehouse.gov/sites/default/files/docs/sexual_assault_report_1-21-14.pdf (accessed January 9, 2016).

⁵ Polaris. *2014 Statistics*, <https://polarisproject.org/sites/default/files/2014Statistics.pdf> (accessed January 9, 2016).

⁶ David Finkelhor & Anne Shattuck, “Characteristics of Crimes against Juveniles,” Crimes Against Children Research Center (2012), http://www.unh.edu/ccrc/pdf/CV26_Revised_Characteristics_of_Crimes_against_Juveniles_5-2-12.pdf (accessed February 4, 2017).

Pornography like “Ho’s Bangin’ Hos: Girls Do It Better,” “Hot & Horny Coeds,” “White Girls Making Daddy Mad,” “Amateur Babes: Tight & Wet,” and “Friends & Family 3,” normalizes sexual abuses like those mentioned above. Despite this, Comcast allows sex buyers to fuel and expand their sexual appetites with the likes hardcore pornography like “Step Dad Seduction,” “Dirty White Girls Filled with Chocolate,” “Mommy Likes Them Big and Black,” “White Guys Favor Urban Beaver,” “Wives Pick Up Teens,” “Teacher Made Me Lesbian,” “Tiny 10 Black Teenage Virgins” and “Wad-Guzzeling Granny’s.” Further, in a letter sent to us dated June 3, 2016, Comcast’s Senior Executive Vice President, David Cohen, defended such material as “providing our customers with choice and a wide range of programming options.”⁷

As many of the above titles and descriptions illustrate, pornography’s emphasis on teen and young girls is inescapable. Clearly much of pornography attempts to accentuate first-time sexual experiences of females, the youthfulness and sexual inexperience of the performers, and the significant age differentials between sexual partners, thus catering to the sexual fantasies of consumers (i.e., sex buyers) that involve sex with the underaged. Other titles suggest violation of appropriate sexual boundaries between step-parents and their step-children, teachers and students, and adults and teens. Thus, sexual abuse is the very premise of these films.

As a wealth of peer-reviewed research demonstrates, pornography is linked to a multitude of harms. For instance, a growing body of neuroscience reveals that adults are developing addictions to pornography as pornography hijacks the brain’s reward center in a way similar to drug addiction.⁸ Moreover, an alarming, nationally representative online survey of 3,000 people reveals that nearly half of young people (ages 13-24) actively seek out pornography weekly or more often.⁹ This is especially troubling given that research shows that adolescents are more susceptible to forming addictions than adults, because the dopamine neurons in their nucleus accumbens (i.e., the brain’s pleasure center) are much more active and have an exaggerated plasticity in response to addictive stimulus.¹⁰ Thus, it can be said that a propensity for addiction is more strongly “hardwired” into the adolescent brain.¹¹

This is alarming given that pornography consumption by adolescents is associated with risky sexual behavior (that can have profoundly adverse effects) such as anal and group sex, hookups, multiple sexual partners, and substance use during sex.¹²

Such outcomes are not surprising in light of research into how the human brain develops which shows that adolescents are not as readily able to access their frontal lobes—the portion of the brain that controls

⁷ David Cohen, letter to National Center on Sexual Exploitation, (June 3, 2016).

⁸ Simone Kühn and Jürgen Gallinat, “Brain Structure and Functional Connectivity Associated with Pornography Consumption: The Brain on Porn,” *JAMA Psychiatry* 71, no. 7 (2014): 827-834. Ji-Woo Seok and Jin-Hun Sohn, “Neural Substrates of Sexual Desire in Individuals with Problematic Hypersexual Behavior,” *Frontiers in Behavioral Neuroscience*, (November 30, 2015). Porn Study Critiques, “Current List of Brain Studies on Porn Users, (September 29, 2015) <http://pornstudycritiques.com/current-list-of-brain-studies-on-porn-users/> (accessed January 28, 2016).

⁹ Barna Group, “The Porn Phenomenon: A Comprehensive New Survey on Americans, the Church, and Pornography,” (2016).

¹⁰ Frances E. Jensen with Amy Ellis Nutt, *The Teenage Brain: A Neuroscientist’s Survival Guild to Raising Adolescents and Young Adults*, (New York: Harper Collins, 2015).

¹¹ *Ibid.*

¹² Debra Braun-Courville and Mary Rojas, “Exposure to Sexually Explicit Web Site and Adolescent Sexual Attitudes and Behaviors 45 (2009): 156-162.

impulses and allows for rapid, smart decision making.¹³ Multiple neurological studies contribute to the view that pornography use interferes with “working memory” performance, thus inhibiting the judgment and decision making functions of the prefrontal cortex.¹⁴

Sexual violence against women, including sexual harassment and rape, are also correlated to the consumption of pornography. A recent meta-analysis of 22 studies from seven countries provides clear evidence confirming that pornography exposure is associated with sexual aggression in the United States and internationally, among both males and females; associations are stronger for verbal than physical sexual aggression, but both are significant.¹⁵ As the authors state, “the accumulated data leave little doubt that, on the average, individuals who consume pornography more frequently are more likely to hold attitudes conducive to sexual aggression and engage in actual acts of sexual aggression than individuals who do not consume pornography or who consume pornography less frequently.”¹⁶

Older adolescents who use pornography are more likely to be attracted to 13 or 14 year olds,¹⁷ and the earlier college men were exposed to pornography the more likely they are to have engaged in nonconsensual sex.¹⁸ Fraternity men who consumed *mainstream* pornography expressed a greater intent to commit rape if they knew they would not be caught than those who did not consume pornography. Those who consumed *sadomasochistic* pornography expressed significantly less willingness to intervene in situations of sexual violence, greater belief in rape myths, and greater intent to commit rape. Among those who consumed *rape-themed* pornography, the researchers described “serious effects” including less bystander willingness to intervene, greater belief in rape myth, and greater intent to commit rape.¹⁹ In other words, there was *no* type of pornography that did not result in a greater intent to commit rape by a user if they knew they would not be caught.

Further, pornography is available to all your customers through your Internet services unless a consumer takes affirmative action to block such material. As you may be aware, in the United Kingdom and in other countries, an “opt-in” approach has been adopted. Nearly all ISPs in the UK have begun blocking pornography unless a consumer exercises an option to “opt-in” for such material. Sky Broadband’s approach has been particularly effective. If Comcast were to take the lead in the country by offering such an option, we believe it would find a large base of support and do much to make up for Comcast’s years of confederacy with the pornography industry.

¹³ Frances E. Jensen with Amy Ellis Nutt, *The Teenage Brain: A Neuroscientist’s Survival Guild to Raising Adolescents and Young Adults*, (New York: Harper Collins, 2015).

¹⁴ C. Laier, F.P. Schulte, and M. Brand, “Pornographic Picture Processing Interferes with Working Memory Performance,” *Journal of Sex Research* 50, no. 7 (2013): 642–652; C. Laier, M. Pawlikowski, and M. Brand, “Sexual Picture Processing Interferes with Decision-Making under Ambiguity,” *Archives of Sexual Behavior* 43, no. 3 (2014): 473–483.

¹⁵ Paul J. Wright, Robert S. Tokunaga, and Ashley Kraus. “A Meta-Analysis of Pornography Consumption and Actual Acts of Sexual Aggression in General Population Studies.” *Journal of Communication*, (December 29, 2015): 1-23.

¹⁶ *Ibid.*

¹⁷ Kristinn Henga, Svein Mossige, and Lars Wichstrom, “Older Adolescents’ Positive Attitudes toward Younger Adolescents as Sexual Partners,” *Adolescence* 39, no. 156, (2004): 627-651.

¹⁸ Mary Anne Layden, unpublished data, 2015.

¹⁹ John Foubert, Matt Brosi, and R. Bannon, “Pornography Viewing among Fraternity Men: Effects on Bystander Intervention, Rape Myth Acceptance & Behavioral Intent to Commit Sexual Assault,” *Sexual Addiction & Compulsivity*, 18, no. 4 (2011): 212-231.

Mr. Brian Roberts
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Today, pornography is pervasive and it is damaging countless lives. Its role in shaping the attitudes and behaviors that fuel the crisis of sexual assault on college campuses, sexting scandals, revenge pornography, sex trafficking, child sexual abuse, compulsive pornography consumption, and more is clear. As a result, our nation is now suffering from a public health crisis fueled by the widespread distribution of adult, hardcore pornography. The term “public health crisis” is used to broadly define both physical and social problems—from cigarette smoking to bullying—and it unequivocally applies to pornography, because pornography is a serious, harmful problem that affects individuals and groups beyond their capacity to correct alone.

The same could be said of cigarettes and the tobacco industry in the 1950s. But as we learned through experience, a public health model that unites government officials, public education efforts, health professionals, and a concerned public, can greatly reduce the impact of a toxic industry. The porn industry of today is simply the big tobacco of the past.

Comcast is now faced with a decision concerning its role in this crisis. Will it play the part of Big Tobacco and continue allowing unfettered access to material that poisons human lives, or will it accept its social responsibility to respond to this problem?

Your Code of Conduct Handbook states: “. . . it is our actions—how we perform day in and day out—that will ensure our success. It’s as simple as doing the right thing and treating people the right way.” The degradation, abuse, and violence found in pornography is a far cry from “doing the right thing and treating people the right way.” Hiding behind the so-called “Adult Content Standards put forth by the Cable and Telecommunications Association for Marketing,” as Comcast did in Mr. Cohen’s June 3, 2016 letter, does not change this fact.

Major corporations such as Omni Hotels, Marriott International, Hilton Worldwide, Walmart, Facebook, and others have eliminated or are eliminating pornography from their business models. This is Comcast’s invitation to do likewise, and in so doing to assume a leadership position within the technology, media, and telecommunications sector.

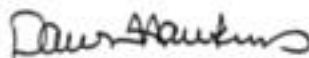
All girls, boys, women, and men have a natural human dignity and thus a right to live lives free from sexual exploitation. Pornography is degrading, dehumanizing, exploitive, and a violation of this right. Pornography is a serial attacks on human dignity, identity, and worth. NCOSE exists to make society aware of this and other forms of sexual exploitation, to equip individuals and families to overcome and protect against those harms, and to advocate that all laws defending the right to be free from pornography are vigorously enforced. The world is now suffering from the effects of widespread sexual exploitation and Comcast has an historic opportunity to play an important role in stopping it.

We hope Comcast will rise to this challenge and meet with us to discuss ways by which it can become a corporate leader in the fight for a world free from sexual exploitation.

Sincerely,



Patrick A. Trueman
President & CEO



Dawn Hawkins
Senior Vice President & Executive Director

Mr. Brian Roberts

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cc: Stephen Burke, Comcast, Executive Vice President
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