



# NATIONAL CENTER ON SEXUAL EXPLOITATION

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May 17, 2016

Mr. Brian L. Roberts, CEO  
Comcast Corporation  
1701 JFK Boulevard  
Philadelphia, PA 19103

Dear Mr. Roberts:

We are writing to express our dismay concerning Comcast's ongoing distribution of hardcore pornography via Xfinity television's video-on-demand and premium channel services and urge that you take prompt action to stop distribution of such material.

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 total degradation and violence found in pornography is a far cry from "doing the right thing and treating people the right way," and so we implore you to recognize that promoting and profiting from hardcore pornographic material is not consistent with the Comcast brand.

Your Code of Conduct also states that you will uphold United States law. However, the pornographic 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.

As the following sample of titles recently offered by Comcast demonstrates, themes of incest, racism, sexism, prostitution, and exploitation are ubiquitous to pornography.

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- **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.

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- **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 54 titles via its Playboy subscription, 24 via Vivid, 25 Hustler films, and 30 titles through TEN subscription. All in all, there are, by one review conducted in April 2016, 515 X-rated offerings on XFINITY/Comcast.

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. 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.

One wonders what Comcast executives can be thinking in distributing and profiting from this kind of material. Presently, our society is reeling from racial stereotypes and violence, colleges and universities are wrestling with an epidemic of sexual assault, thousands of young women and girls are being trafficked for purposes of prostitution, and child sexual

abuse is 75 times more common than pediatric cancer. Thus, 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,” only exacerbate deeply-entrenched social ills that have devastating impacts at the individual and societal level. Yet, Comcast allows sex buyers to fulfill their sexual urges with the likes of the above, as well as 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.”

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 the performers, and 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.<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup> Thus, it can be said that a propensity for addiction is more strongly “hardwired” into the adolescent brain.<sup>4</sup>

This is alarming given that Internet pornography consumption by adolescents is associated with risky sexual behavior that can have profoundly adverse effects such as anal sex,

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<sup>1</sup> 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).

<sup>2</sup> Barna Group, “The Porn Phenomenon: A Comprehensive New Survey on Americans, the Church, and Pornography,” (2016).

<sup>3</sup> 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).

<sup>4</sup> Ibid.

multiple sexual partners, and substance use during sex.<sup>5</sup> However, 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 impulses and allows for rapid, smart decision making.<sup>6</sup>

Furthermore, sexual violence against women, including sexual harassment and rape, are 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.<sup>7</sup> 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.”<sup>8</sup>

A separate meta-analysis of 46 studies demonstrated that pornography exposure contributes to the development of sexually dysfunctional attitudes and behaviors including:

- 1) developing sexual deviant tendencies,
- 2) committing sexual offenses,
- 3) experiencing difficulties in intimate relationships, and
- 4) accepting rape myths.<sup>9</sup>

Older adolescents who use pornography are more likely to be attracted to 13 or 14 year olds,<sup>10</sup> and the earlier college men were exposed to pornography the more likely they are to have engaged in nonconsensual sex.<sup>11</sup> Fraternity men who consume *mainstream* pornography express a greater intent to commit rape; those who consume *sadomasochistic* pornography express significantly less willingness to intervene in situations of sexual violence, greater beliefs in rape myths, and greater intent to commit rape; and, among those

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<sup>5</sup> Debra Braun-Courville and Mary Rojas, “Exposure to Sexually Explicit Web Site and Adolescent Sexual Attitudes and Behaviors 45 (2009): 156-162.

<sup>6</sup> 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).

<sup>7</sup> 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.

<sup>8</sup> Ibid.

<sup>9</sup> Paolucci-Oddone, E., Genuis, M., & Violato, C. (2000). A meta-analysis of the published research on the effects of pornography. In C. Violato, E. Paolucci-Oddone, & M. Genius (Eds). *The Changing Family and Child Development* (pp. 48-59). Aldershot, England: Ashgate Publishing.

<sup>10</sup> Henga, H. Mossige, S., & Wichstrom, L. (2004). Older adolescents’ positive attitudes toward younger adolescents as sexual partners. *Adolescence*, 39 (156), 627-651.

<sup>11</sup> Layden, M.A. (2015). Personal communication.

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who consume *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.<sup>12</sup> In other words, there was *no* type of pornography that did not result in a greater intent to commit rape. From this small sampling of a rich body of research, it is clear that hardcore, adult pornography is not benign “information” that promotes the “enlightenment” of people.

We also have testimonials from former pornography performers who report being exploited, given illicit drugs, coerced to perform objectionable acts, and raped, thus constituting sexual trafficking under the U.S. Trafficking Victims Projection Act.

All boys, girls, women, and men have a natural human dignity and thus a right to live lives free from sexual exploitation. All pornography is degrading, dehumanizing, exploitive, and a violation of this right. All pornography is a serial attack on human dignity, identity and worth. NCOSE exists to make society aware of pornography’s many harms, 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. Our nation is now suffering an emerging public health crisis from the widespread distribution of pornography, and Comcast bears a great burden of responsibility for that harm. So we will not rest until Comcast extricates itself from the pornography industry.

Other major corporations such as Marriott International, Hilton Worldwide, Hyatt Hotels Corporation, Overstock.com, and others have eliminated or are eliminating hardcore pornography from their business model. Now is the time for Comcast to do likewise and, in so doing, take a leadership position in the communications industry.

We welcome the opportunity to meet with your representatives to discuss how Comcast become of corporate leader in the fight for freedom from sexual exploitation.

Sincerely,

Patrick A. Trueman  
President & CEO

Dawn Hawkins  
Senior Vice President & Executive Director

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<sup>12</sup> 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.

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cc: Attorney General Loretta E. Lynch

Rep. Bob Goodlatte, Chairman, U.S. House of Representatives Judiciary Committee

Sen. Chuck Grassley, Chairman, U.S. Senate Judiciary Committee

Sen. John Thune, Chairman, U.S. Senate Comm. on Commerce, Science, & Transportation

Rep. Fred Upton, Chairman, U.S. House of Rep. Energy & Commerce Committee

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Michael Cavanagh, Comcast, CFO

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