



APT GUIDELINES FOR UNDERWRITING CREDITS

The FCC requires that all funders of programs be identified by on-air credits. As stated by the FCC, the purpose served by underwriting credits is to identify the funder in the interests of full disclosure, not to promote the funder or its products and services. But it has for years permitted some “enhancement” of credits to provide additional descriptive information. All underwriting credits must be in keeping with the non-commercial nature of public television.

Program suppliers are required to fully disclose all funders of a program to American Public Television. If APT has reason to think that the ostensible funders are not the actual funders, APT will inquire further to assure that the actual source of the funds is identified.

Presenting organizations assume responsibility for adherence to APT funding guidelines on behalf of the supplier. The underwriting credits must be approved by APT prior to the program release, in accordance with the attached policies regarding underwriting credits. To make the underwriting credit approval process as efficient as possible, APT requires that the presenting station's FCC counsel review credits before submitting them to APT.

These guidelines do not cover every possible creative element in an underwriting credit. In addition, public television licensees face potential financial and legal penalties if they broadcast credits which are not legally acceptable. Therefore, APT reserves the right to interpret credit elements, change policy or implement new guidelines to ensure compliance with FCC requirements that is at an acceptable national level for all licensees.

As always, APT is available to answer specific questions in relation to its policies. We actively encourage you to contact us with any queries or concerns.

Judy Barlow
Judy_Barlow@aptonline.org

Hilary Finkel Buxton
Hilary_Buxton@aptonline.org

Revised September, 2014



APT GUIDELINES FOR UNDERWRITING CREDITS

I. Length of Credits

- A. A typical public television underwriting pod contains up to four credits at a maximum of :15 seconds each.
- B. APT requires that underwriting credits be delivered in the standard length of up to :15 per credit, except in the case of (E), below.
- C. Total length for all standard underwriting pods may not exceed :60 at the beginning and :60 at the end of the program, except in the case of (E) below.
- D. There is no limit as to the number of underwriters allowed; however, all must be identified within the time allowed for the underwriting credit pod.
- E. APT will consider :30 credits for exceptionally generous funders, on a case-by-case basis. Such funders must meet the following criteria, at a minimum:

- 1) The underwriter must contribute at least the following to support a qualifying program or series.

Number of Episodes Sponsored:	Minimum Amount of Sponsorship
One	\$150,000
2-8	\$200,000
9-13	\$300,000
14-26	\$400,000
27-52	\$500,000
53+	pro-rated on a case-by-case basis

- 2) The funding must be received and used by the producer for a single broadcast season or other appropriate time frame within a 12-month period.
- 3) For children's programming, :30 credits may only contain one of the following: a message of support for the public television mission, an educational message, or a message to promote children's welfare. All other messages are not permitted in :30 credits on children's programming.



APT GUIDELINES FOR UNDERWRITING CREDITS

- 4) All underwriters, including :30 sponsors, must be identified within :90 seconds (with the exception of children's programming). The expansion of the pod to: 90 only applies when there is at least one :30 spot.
- 5) The pod length for children's programming is limited to :60.

Other conditions regarding eligibility and content for :30 credits as determined by APT may apply. All :30 credits ("Premium Sponsorship") require documentation that the grant provided meets the above thresholds, to be submitted with the APT Underwriting Approval Form. This documentation can take the form of a statement on funder's letterhead, or a copy of the underwriting contract, et al.

II. Frequency

- A. Underwriters must be identified at the beginning and end of the program. Certain exceptions exist; please contact APT for more information.
- B. Public affairs, news and programs with controversial content must have underwriter identification at both the beginning and the end of the program.
- C. All funding credits must appear together. An individual underwriter may not be credited with greater frequency than the other underwriters, regardless of the amount of funding contributed.
- D. When an underwriter funds a series after it has been released, or wishes to change an existing sponsor credit, the underwriter's updated credit must run on all episodes in distribution and the episodes re-fed as necessary. In the case where an original funder is removed from the underwriting pod, that funder must be identified with a text credit in the production credits.
- E. In specific instances, underwriting for less than the full number of episodes in a series may be permitted ("series" being defined as 10 programs or more) and will be evaluated on a case by case basis. See [APT National Program Funding Guidelines](#) for more on this subject. Shorter sponsorship durations will also be considered.



APT GUIDELINES FOR UNDERWRITING CREDITS

III. Placement

- A. The underwriting pod at the beginning of the program should occur no later than the first three minutes of the program.
- B. The closing underwriting pod may appear at any point after the program ends, but must appear before the APT animated logo (system outcue).
- C. APT recommends that credits appear in the order of amount of funding provided, with the largest funder appearing first.
- D. Mid-break credits are permitted for programs longer than 75 minutes.
- E. Funding disclosure must be presented to maintain a clear separation between credits and program content. All underwriting credits must contain funding identification language, e.g., “This program was funded in part by...” (also known as a pre-amble). In the case of multiple funders, the main funding identification can occur at the top of the underwriting pod, and should note the funding plurality (e.g., "This program was funded by the following..."). The words “and by” may be used in between credits to maintain flow of copy, but are not required.

IV: Subsidiaries, Divisions, and Brands

- A. Subsidiaries or divisions are eligible for underwriting credits and may be considered underwriters; an underwriter may be identified by one of its brands. The same underwriter may not have more than one announcement in a single pod.
- B. Multiple credits from the same parent corporation, division, subsidiary, or brand are permissible within the guidelines provided in I(E), as well as the following:
 - 1) Credits appearing within one pod must be distinctly different. Multiple credits featuring brands from the same brand line* are not permitted. APT will determine the amount of spots permitted within that pod on a case-by-case basis.
 - 2) The acceptability of brands for separate credits will be determined by APT on a case-by-case basis; we reserve the right to exclude brands, if these brands or creative treatments of the credits are deemed too similar.
 - 3) APT will review the funding arrangement to determine its acceptability. Funding that is arranged to circumvent the intent of the guidelines, including :30 sponsorships, will not be approved (see I [E]).



APT GUIDELINES FOR UNDERWRITING CREDITS

***Brand Line," in this case, is defined as a brand and its extensions (e.g., Coca-Cola, Diet Coke, Vanilla Coke, Cherry Coke, et al)*

- 4) The parent company does not need to be identified; however, APT reserves the right to request that the parent company be revealed in the funding credit, particularly for public affairs related programs.

Please contact us early in your sponsorship process so that we can assist you in determining eligibility for multiple credits.

V. Crowdsourced Funding

All donors who provide funding through crowdsourced websites (such as Kickstarter, IndieGoGo, etc) must be publicly identified per FCC guidelines. If the list of donors from crowdsourced funding is too large to fit in the on-air underwriting pod, the following rules will apply:

- A. Major donors will be credited on-air in the underwriting pod. APT will identify a reasonable cut-off amount. The complete list of funders (including those not identified on-air) must be made available on APT's and the producers' website (if one exists). The phrase, "A complete list of funders is available at APTonline.org and (producer's website URL)" should be used on-air in the underwriting pod.
- B. Every individual or organization who contributes funding must be identified. No "anonymous" giving is permitted. Producers must make this clear to potential contributors to a crowdsourced campaign.
- C. Production titles and credits, such as "Associate Producer" are not permitted to be granted in exchange for a donation.
- D. Similar to corporate underwriters, all individuals or groups donating will be vetted to make sure there is no editorial involvement or connection to program content. Be aware of contributions that appear to compromise editorial integrity; APT reserves the right to ask producers to return contributions that we feel present a conflict of interest, or reject the funding plan entirely.

VI. Producers, In-kind Contributors

- A. APT permits the on-air acknowledgment of documented, substantial in-kind contributions. However it should be noted that acknowledgment of in-kind contributors is not required by the FCC.



APT GUIDELINES FOR UNDERWRITING CREDITS

B. In-kind credits may only appear at the end of the program in the normal text of the production credit roll. In-kind contributions that are acknowledged in the form of an underwriting credit are granted in some cases, but are subject to APT approval.

C. In-kind credits may identify the product or service provided. No slogans, locations, telephone numbers or web-site addresses are permitted. Logos and/or spots for *major* in-kind contributors are permitted, to be determined by APT. Please contact us for details.

D. Program producers do not receive an underwriting credit, even though they may have contributed financially to the production.

VII. Closed-Caption Credits

A. In order to encourage closed-caption funding, closed-caption funders are allowed a separate credit after program content.

There may be no more than two closed captioning funders, and their credits must be positioned together. The words “and by” must separate each credit. The closed-caption contribution must be identified in audio and/or video with a preamble that must not exceed :03, i.e., “Closed-caption funding provided by _____.” The total amount allotted for all credits is :10 seconds, excluding this preamble.

Corporate logos are permitted. Product depictions are also permitted in audio and/or video. Web site addresses are permitted in video only. APT must clear and approve all closed-caption credits.

VIII. Restrictions on Underwriters

A. Companies that are solely in the business of manufacturing or distributing any of the following products are not acceptable to APT as funders for public television programming: tobacco products, distilled spirits, firearms. ‘Waist to knee’ adult personal products may not be considered appropriate, but will be evaluated on a case-by-case basis.

B. No underwriting credit may depict tobacco products, distilled spirits or firearms. Depictions of ‘waist to knee’ adult personal products may not be considered appropriate, but will be evaluated on a case-by-case basis.



APT GUIDELINES FOR UNDERWRITING CREDITS

C. Underwriting by lotteries or casinos that identifies or describes their gambling activity is not permitted. Language that identifies a casino as a concert venue would be acceptable.

D. Other products may be inappropriate for certain types of programming and will be evaluated on a case by case basis.

IX. Slogans

A. Slogans are permitted if they are part of an established identity plan. Corporate divisions/subsidiaries, and brands with established slogans which contain qualitative claims or calls to action may not be permissible, and will be evaluated on a case-by-case basis.

B. A slogan must be used in conjunction with the funder's name and must appear in video or text at the same time as the corporate, division/subsidiary, or brand name. A slogan cannot be used in text of the credit in such a way that it is no longer a slogan but part of the copy when such use creates an impermissible statement. (i.e., "We make great meals easy" is acceptable as an established slogan, but the sentence "We bring you the ingredients to make great meals easy" is a qualitative promotional statement)

X. Logos

A. Corporate, division/subsidiary, and brand logos are permissible. If a logo does not clearly identify an underwriter, the funder's name must be stated in video in the lower 1/3 of the credit, and mentioned in audio.

XI. Content

A. Funders are encouraged to provide a message of support for public television in their credits.

B. Underwriters must comply with other agency requirements (e.g., FDA or FTC disclosures) within the time allowed. It is the program supplier's responsibility to comply with any applicable agency requirements.

C. When an underwriter is credited at the beginning and at the end of a program, the credit content may be different.



APT GUIDELINES FOR UNDERWRITING CREDITS

D. The following are examples of identifying information which are acceptable to use in an underwriting credit:

- The length of time a funder has been in business
- Product depictions in video
- Demonstration of products
- Sounds of products being used (but not excessive effects)
- People may be used to demonstrate a product in a value-neutral manner.
- Target populations may be depicted in audio and video
- Jingle music with lyrics if not promotional
- Qualitative terms on packaging are permitted if in small type or unobtrusive
- Corporate officials, funder's employees, spokespersons or celebrities may appear in video and audio. The person may need to be identified.
- "PSA" type language is permitted, however a message cannot pitch support of a non-profit (e.g. "XYZ encourages you to give blood" is permitted, but "XYZ, Inc. urges you to support the Red Cross" is not permitted)

The following are examples of terms that are permissible:

- “Creative” to describe advertising services
- “Fresh and original” to describe health food
- “Timeless traditional truths” to describe an art gallery’s works
- “AT&T - the right choice” - established corporate slogan
- “The department store specializing in golf ... providing everything.”
- “Gourmet” or “Distinctive” to describe food
- “Exclusive source” or “exclusive distributor” of a product
- “A wide assortment”
- “A true Italian product”
- “100 years of innovation”

E. The following are examples of elements which are not permitted in funding credits:

- Gratuitous, overly promotional language
- Comparative or qualitative descriptions
- Superlatives or promotional features, *even if true and substantiated*
- Price information, sales language, discounts, savings or value claims
- Inducements to buy
- Calls to action to use or buy products or services
- Commercial-sounding, shrill v/o delivery
- Excessively wordy
- Unnecessary and excessive repetition



APT GUIDELINES FOR UNDERWRITING CREDITS

- Excessive number and speed of video cuts
- The phrases “presented by” or “presents”
- People promoting products (however people may demonstrate use of products)
- People showing consumer satisfaction.
- Talent who appear in the content of a program may not be used in either video or audio in the funding credits, whether they are identifiable or not.
- Images, video or audio from program content

The following are examples of terms that are not permissible:

“. . . the most requested kitchenware and cooking tools of television viewing audiences” - endorsement, qualitative claim, comparative claim

“Where fine wines begin” - qualitative claim

“Easier to control” - qualitative claim, comparative claim

“The place to buy hardware” - qualitative claim

“This program is brought to you by your friends at _____” (or “by the experts at”) - commercial advertising technique

“It’s not too big, not too small, but just right” - qualitative, comparative

“Rebuilt transmission work carries a one year warranty” –
“warranty” is prohibited price information and an inducement to buy.

“...the world’s largest manufacturer and servicer of elevators” - qualitative, even if true

The world’s leading supplier of software - qualitative, even if true, comparative claim

“98% of lead and chlorine is eliminated” - qualitative product claim, even if true

“...safe to use in the kitchen” - qualitative claim



APT GUIDELINES FOR UNDERWRITING CREDITS

XII. Underwriter Web Sites/Toll free Numbers/Stock Symbols

A. Underwriter toll-free numbers and/or NYSE/NASDAQ Stock symbols may appear in the underwriter's credit, in video only. Underwriter Web site addresses may appear in the underwriter's credit in audio and video.

B. There may be no calls to action in the presentation/usage of the web site address or phone number.

C. Text and/or logo references to social media platforms such as Facebook and Twitter are permitted, but no calls to action are allowed in verbiage.

The following are examples of use that are not permissible:

“Follow us on Twitter for discounts and more...”

“‘Like’ us on Facebook and receive coupons...”

The following are examples of terms that are permissible:

“For more information, we’re on Twitter: @CompanyName...”

“For more information, we’re at Facebook/Company Name...”

XIII. Children’s Programs

APT adheres to the guidelines for underwriting credits on children’s programs as stated in Rule 2 of the PBS National Program Funding Standards and Practices April 2004 edition (summarized below).

Underwriting credits that are targeted at adults on children’s programs must follow the policies as stated in the APT Guidelines for Underwriting Credits.

Underwriting credits designed to appeal to viewers under 12 years of age must also comply with the following policies:

A. Underwriting credits on children’s programs may not be longer than :15, except when a :30 credit has been approved by APT. See section I(E)4 and I(E)5 for details on :30 underwriting credits for children’s programming.

B. Underwriters must be identified by name and/or logo. The credit may include a brief generic identification of the company’s product or service and depiction of the company’s spokescharacter or mascot to clearly identify the funder.

C. Product depictions, in or out of packaging, are not permissible.



APT GUIDELINES FOR UNDERWRITING CREDITS

D. Program hosts, characters or mascots may not appear in either video or audio.

E. The remainder of the underwriting credit message must be a statement supporting public television, learning or education (calls to action are permitted here). E.g., “Exercise your Head. Read! Ghostwriter is brought to you in part by Nike.” All other messages are strongly discouraged.