CHAPTER 2

CARA and the Emergence of Responsible Entertainment

When Al Van Schmus—the last of the Breen Boys—retired, the Classification and Rating Administration lost all resemblance to the Production Code Administration. Or did it?
—Leonard J. Leff and Jerold L. Simmons, The Dame in the Kimono

A regulatory facelift could not have come at a better time when the MPAA established the Code and Rating Administration (CARA—changed to Classification and Rating Administration in 1977) on November 1, 1968; the motion picture business in the United States was in shambles. Declining attendance, shifting cultural mores, cinematic free expression, and independent and foreign film competition led producers, distributors, and exhibitors to discard long-standing codes of industry conduct and cooperation for short-term personal gain. These abandoned “gentleman rules,” as Jon Lewis calls them, dissolved a business arrangement between the three branches of the motion picture business that guaranteed the appearance of harmless entertainment to Hollywood’s various audiences and detractors.1 The standards and practices of the industry’s centralized process of self-regulation were impotent amidst this undoing, unable to endow Hollywood entertainment with an affirmative cultural function so systematically accomplished in the past. The MPAA had to reconceptualize its products whether it wanted to or not.

Despite these obstacles, the rating system prevailed, surpassing the tenure of the Production Code Administration (1930–1966) as it celebrated its thirty-ninth year in 2007. Instead of a uniform PCA seal, CARA currently assigns one of five age-based rating categories to a film: G (suggested for general audiences); PG (parental guidance suggested); PG-13 (parents strongly cautioned); R (persons under 17 not admitted, unless accompanied by parent or adult guardian); and NC-17 (no one 17 and under admitted). Since the inception of a rating system, the MPAA and its longtime president, Jack Valenti (who retired in 2004 and was replaced by Dan Glickman, who served as secretary of agriculture under Bill Clinton), have repeatedly differentiated the self-regulatory policies and procedures of CARA from its predecessors: “a voluntary rating plan” that “assures freedom of the screen,” announced a 1968 press release; “a totally new approach,” declared Valenti for Daily Variety in 1975, that “would no longer ‘approve or disapprove’ the content of a film”; a replacement for “a stern, forbidding catalogue of ‘Dos and Don’ts’” [that had] the odious smell of censorship,” wrote Valenti in a 1991 industry pamphlet. And in 1998 an MPAA press release proclaimed that the voluntary rating system replaced “an absurd manifesto called the Hays Code.”2 These accounts indicate that the MPAA always wanted consumers to believe that CARA and the PCA were entirely separate regimes, distinctive markers of censorious “Classical Hollywood” and liberated “New Hollywood.” Valenti frequently expressed this sentiment of CARA being a more modernized system, one that allowed the filmmaker “to tell his story in his way without anyone thwarting him.”

Valenti’s words seem initially plausible. First, different age categories gave filmmakers greater creative leeway than a single-seal-for-all-audiences approach. Content and themes previously forbidden by the PCA were now more permissible under a classification system. Second, moral absolutism, once the backbone of the Production Code, gave way to a world of moral relativism under classification. Film ratings were a determination of the possible suitability of a film for children and were not grounded in Catholic doctrine. Last, CARA regulated films only after their completion. Unlike the PCA, CARA did not actively shape film narrative and form during the production process in order to ensure mass distribution and exhibition of Hollywood’s products. Classification, it would appear then, enabled and permitted freer expression in Hollywood films than self-regulation under the Production Code.

Freer expression? Indeed. Free expression? Definitely not. This chapter will demonstrate that CARA functioned similarly to the PCA in one key respect: to control entryway and participation into the legitimate theatrical marketplace. I will first argue that classification reestablished a system by which the MPAA could govern the flow of product through the production, distribution, and exhibition sectors of the Hollywood film industry. Together with the full cooperation of the National Association of Theatre Owners (NATO) by 1973, the MPAA, through CARA, was able to construct a new model of entertainment, what I call “responsible entertainment,” an industry standard that functioned much like “harmless entertainment” during the
Production Code. Responsible entertainment required, above all, a collective adherence and commitment by the major distributors and exhibitors to completely abandon the use of the X/NC-17-rating product line. By regulating all Hollywood films into R category or lower what I call the Incontestable R—the industry could ensure the suitability and respectability of Hollywood's products in the eyes of audiences. Hollywood, in other words, updated its business practices (a rating system enabling free expression) without changing its business model (entertainment for all ages). The remainder of the chapter will focus on the mid-1970s to 1990, a period of notable rating cases when filmmakers and opportunistic distributors challenged the boundaries of the Incontestable R, causing a momentary rupture in the guise of responsible entertainment. Moments like these were few, I argue, but they highlighted the fact that the rating system, while enabling greater creative freedom than the Production Code, still is a virtual synonym, in the words of Bruce A. Austin, for both "self-preservation" and self-interest, the same ideals that have motivated the MPAA for more than eighty years.⁴

**Responsible Entertainment and a New Code of Self-Regulation**

In his 1990 *American Film* article "What Will H. Hays Begat: Fifty Years of the Production Code," film critic and historian Charles Champlin correctly asserts that the Production Code never truly ended; it was momentarily sidetracked, then gradually transformed into a classification system, another "voluntary and self-regulating way of heading off more imposed censorship."³ This new "way" of self-regulation not only served once again as a buttress against federal legislation, but it also helped to reestablish the commercial efficiency of the Hollywood film industry under the guise of responsible entertainment.

In beginning to understand CARA as a reformulation of the MPAA's business practices rather than an overhaul of its operations, it is important to realize that the rating system was actually always intended to be a "production code" for the major Hollywood distributors just like its predecessor. On the surface there were many points of continuity between the two administrations. CARA originally stood for the Code and Rating Administration, and many PCA administrators moved over to CARA (which also occupied the same Hollywood offices for a time). Eugene Dougherty, the senior member of the Production Code staff who served under Joseph Breen and Geoffrey Shurlock, became CARA's first chairperson. Shurlock himself remained as a consultant. Also retained was Richard R. Mathison, a PCA staff member since 1965, and longtime examiner Albert E. Van Schmus, who continued in his role as a senior examiner until his retirement in 1982.⁵ The CARA seals maintained the numerical sequence set by the PCA seals.

To be sure, the Production Code was definitely a more determining and constrictive force in the constitution of Hollywood-produced films from 1930 to 1966. Van Schmus admits that its single-seal-for-all-audiences standard was undoubtedly censorship of free expression: "I always looked upon myself as a censor. I admit it. That's what I was there for, to try to talk somebody out of doing something in their script."⁶ The rating system liberalized the Code, allowing filmmakers to theoretically address any and all subjects across various age categories. CARA examiners looked at a film's theme, content, and treatment of subject matter to determine its appropriateness for children. In the early years a rating of G, M (later GP then PG), or R was then assigned to those films that all or some parents may find acceptable viewing for their children. An X rating was awarded to films off-limits to children under sixteen (later under eighteen). In any case CARA, unlike the PCA, guaranteed a rating "category" to each applicant and nearly unlimited cinematic expression to all.

Yet an examination of the official 1968 Code of Self-Regulation reveals a less altruistic side to the MPAA, one that supports a claim made by outgoing PCA head Geoffrey Shurlock at the time of CARA's creation: "We'll use the same standards that we've used for 30 years in applying the code."⁷ In fact, the 1968 Code was practically a carbon copy of the 1966 Code (which itself was based on the 1930 Production Code), with one key difference: a four-tiered rating system replaced the Suggested for Mature Audiences tag. Even the "Declaration of Principles" and "Standards of Production" were lifted directly from the 1966 Code of Self-Regulation to guide administrators about matters of sex, violence, and other wrongdoings in considering motion pictures for ratings approval. These replications confirm Van Schmus's pronouncement that the 1966 Code of Self-Regulation was merely an "advertising effort" in preparation for classification.

Even so, contained in the language of the 1966 and 1968 Code documents lies the foundation of boundary maintenance under CARA, what I have previously referred to as "responsible entertainment." The word responsible is stated four times throughout both Codes, and none of these four is more important than the one employed in the "Declaration of Principles": "To encourage artistic expression by expanding creative freedom," and "To assure that the freedom which encourages the artist remains responsible and sensitive to the standards of the larger society."⁸ Valenti elaborated more on these
tenets in a section entitled “Censorship and Classification-by-Law Are Wrong” from a “Personal Statement” released in connection with the announcement of CARA and the 1968 Code:

We will oppose these intrusions into a communications art-form shielded and protected by the First Amendment. We believe the screen should be as free for film-makers as it is for those who write books, produce television material, publish newspapers and magazines, compose music and create paintings and sculptures.

At the same time I have urged film creators to remember that freedom without discipline is license, and that’s wrong, too. I have, in the many meetings I have had with creative people in film, suggested that the freedom which is rightly theirs ought to be a responsible freedom and each individual film-maker must judge his work in that sensible light. I’m cheered by the response to my suggestions.10

The balance between artistic expression and cultural sensitivity, what Valenti delineated here as “responsible freedom,” is essentially the philosophy behind “responsible entertainment” in the classification era. A process for determining the upper threshold of responsible entertainment and CARA’s strategies for effectively enforcing this boundary was never outlined in the 1968 Code. At CARA’s inception, though, a policy to negotiate these concerns can be found in the new Code’s proclamation, “Freedom of expression does not mean toleration of license.” Often repeated by Valenti throughout his tenure, this phrase points to the strategies the MPAA envisioned for responsible entertainment at that time and the ones it currently upholds now.

How, then, did the MPAA reconcile two contradictory objectives in the Code of Self-Regulation, one in which creative freedom could flourish as long as it was balanced by a sense of self-restraint and social responsibility? Or as Valenti succinctly put it again: “Every filmmaker ought to be able to tell a story the way he wants to. But that kind of freedom ought to be harnessed.”11 The MPAA did so by having it both ways, by perpetuating the belief that CARA supports free expression of filmmakers while at the same time actively discouraging the use of the X rating among its membership. In this manner the MPAA could subscribe to a framework of creative license but still function according to an affirmative cultural model of entertainment. As a result, the MPAA could manage the flow of product through every sector of the film industry under its own terms of boundary maintenance—responsible entertainment—while also publicly denying its role as a censor.

Before this could happen, Valenti needed the industry to adhere to the standards of responsible entertainment not only in theory but in practice.

The success of CARA depended on the collusive support of its judgments by the members of the MPAA and NATO. What responsible entertainment might look like or feel like or taste like was anybody’s guess at the time. But Valenti knew early on that the menu did not include the X rating.

**The MPAA and the X Rating**

In a 1977 hearing on Capitol Hill Jack Valenti outlined the principles that led to the success of the MPAA rating system:

Let me tell you that the linchpin of this rating system was the interlinking of essential ingredients. First, the system must have integrity, must have probity. It must be proof against pressure from all sides, majors and independents, from anyone who has a personal economic stake, or anyone who may assume they have an economic stake, in the outcome of the ratings. . . . Second, we had to have a partnership of everybody involved in films, the retailer, the theaterowner who exhibits the film, the independent director and producer, and the major director and producer. . . . Third, a policy mechanism had to be created so that if someone felt aggrieved by a rating, he had a place to go. You can’t have a czar or a dictator saying, “That is it, and no more.” Four, and this is the crux of the system, it really had to perform a service for parents. Otherwise, the ratings had no meaning. Those were the four indispensable elements that formed the recipe for the rating system.12

When the MPAA established CARA in 1968, these four elements were effectively set in place. Lending initial integrity to the system was the creation of the X rating, which barred those under sixteen and quieted concerns about children’s access to sexually explicit material. I will examine the advent of the X in terms of two of the three major partners in CARA: the MPAA (the seven “majors” minus RKO, which had its assets stripped by Howard Hughes in 1955, plus two new independent distributors: Allied Artists and Avco Embassy) and NATO (which represented most of the major exhibition chains). The third partner in CARA was the International Film Importers and Distributors of America (IFIDA), a trade organization representing a mass of independent companies, which played little role in the rating system.13 If any distributor disagreed with an assigned rating from CARA’s Rating Board, one had the opportunity to appeal the original rating to CARA’s Appeals Board. And written into the principles of the Code of Self-Regulation was a commitment to parents to help them “determine whether a particular picture is one which children should see at the
discretion of the parent; or only when accompanied by a parent; or should not see.”

An industry-wide commitment to these goals was necessary to lay the foundation of responsible entertainment. The MPAA needed protection from moral reformers and politicians. NATO was bound by the courts to keep sexually explicit material away from children. And Valenti, wanting no part of any of them, wished to keep the industry, in the words of Jon Lewis, “out of the dirty movie business.” It was not until 1973, however, that the members of the MPAA and NATO collectively abandoned the use of the X rating, a category that had quickly become synonymous with “the dirty movie business” shortly after the inception of CARA.

“The stigma of the X,” Justin Wyatt explains, was the result of the rating’s widespread and pronounced use as a marketing tool in the late 1960s and early 1970s to tap into a market segment of adult viewers previously ignored by Hollywood. Mainstream filmmakers, distributors, and exhibitors took advantage of the creative freedom and notoriety provided by an adults-only category, as did exploitation filmmakers and pornographers. This interindustry practice, Wyatt notes, created initial confusion over the meaning of the X rating, dividing the adult-film marketplace into three distinct areas: serious “adult dramas,” like Clockwork Orange (1971), primarily distributed by the MPAA signatories and incorporating graphic, though simulated, sex scenes and/or adult subject matter; “soft-core” exploitation (Cherry, Harry & Raquel [1969]); and “hard-core” pornography (Deep Throat [1973]), the domain of the independents and marked by differences in sexual content, exhibition, and pricing. As a result of the category’s appropriation by members of the legitimate and the nonlegitimate film industry for exploitative purposes, the X quickly became associated with pornography, providing little chance for serious artistic filmmakers to adopt the rating. It became clear that if filmmakers wanted to make responsible Hollywood entertainment in the classification era, they had to make it with an R rating or go outside the legitimate theatrical marketplace.

The fact that independent distributors could self-impose the X was the result of the MPAA’s never copyrighting the category, unlike the other ratings. I am uncertain, though, if this omission was a legal maneuver on the part of Valenti or a Machiavellian scheme of his to force filmmakers to use their creative freedom “responsibly.” In the case of the former, Valenti stated in a 1975 MPAA press release that his original intent was to have only three ratings—G, M, and R—because it was his view that parents should have the right to take their children to any film they choose. He said, however, that NATO urged him to create the X category out of fear of legal redress under Ginsberg, the 1968 Supreme Court case that ruled that material could be considered obscene for children but not for adults. He supplements this legal explanation in a 1990 interview, claiming that the X rating was not copyrighted because the MPAA charged a fee for its rating service. The X “had to be open-ended,” he said, “so that if somebody doesn’t want to submit a picture [to the MPAA], they can use the X. Otherwise, we couldn’t be challenged on First Amendment grounds.” As for the Machiavellian rationale, it is hard to believe that Valenti did not anticipate the appropriation of the uncopyrighted X by soft- and hard-core pornographers. The X permitted any and all representations of sex and violence to be subsumed under its category. The basic principle of responsible entertainment—“freedom of expression does not mean toleration of license”—could never be contained within a no-limits classification. Even if there is some truth to Valenti’s legal justifications for not copyrighting the X, the excuses peculiarly support a system of boundary maintenance dependent on that rating’s stigmatization and abandonment.

Whatever the reason(s) may be for failing to copyright the X, the MPAA pretty much avoided the “dirty movie business” for both serious adult works and soft-core features from the very beginning of CARA. The number of X-rated films released by the MPAA signatories (Columbia, MGM, Paramount, 20th Century-Fox, United Artists, Universal, and Warner Bros.) between November 1, 1968, and October 8, 1973, totaled only twenty-five pictures (1968: 6; 1969: 11; 1970: 7; 1971: 3; 1972: 4; and 1973: 1). Many of these films were foreign produced, including adult dramas (The Damned [1969]; The Devils [1971]), soft-core sexual comedies (The Best House in London [1969]), and a documentary (The Body [1971]). Only a small proportion was U.S. produced, including serious-minded films like Medium Cool (1969), Midnight Cowboy (1969), and Last of the Mobile Hot-shots (1971), as well as sexual farces like Can Hieronymus Merkin Ever Forget Mercy Humpe and Find True Happiness (1969) and Beyond the Valley of the Dolls (1970). The shrinking year-to-year number of legitimate X pictures produced stateside and released by the majors reflected the rating’s instant cultural stigma and especially its economic liabilities: the category’s age restrictions prevented a large portion of the potential audience from ever purchasing tickets.

When some MPAA signatories did exploit the notoriety provided by the X rating and its suggestion of “uncensored spectacle,” as did Warner Bros. with Girl on a Motorcycle (1968), for example, they met with a harsh reception. One unnamed Warner Bros. executive said, “[The Code staff] asked us to make some cuts, but we decided to go ahead and take the X rating and make some money.” But after Girl on a Motorcycle’s disastrous performance at the box
office, Warner Bros. rereleased the film with an R rating and a new name (*Naked under Leather*) after removing an erotic lovemaking scene and Marianne Faithfull’s masturbation scene. Paramount’s *If…. (1968)* and the independent Sigma III film *Greetings* (1968) were also released in edited R versions after their initial X runs.

The rereleasing of *Girl on a Motorcycle, Greetings, and If…. with R ratings in 1969 suggests that both MPAA and independent distributors became quickly disenchanted with the box-office potential of serious-minded X-rated pictures. Their initial eagerness to take advantage of the adults-only rating gave way almost immediately to its cultural stigmatization. By July 1969 certain newspapers had begun to reject advertisements for X-rated films, and many TV and radio stations established policies refusing to run trailers for them. Some stations would not even run ads for M-rated films before 10 p.m. Moreover, difficulties in promoting X-rated films exposed the rating’s inherent economic limitations to the MPAA signatories: the age restrictions simply made them a poor financial investment. If an R could play to a mass audience, so the executives thought—albeit one that required adult supervision for children—why not cut a film to fit the lower category’s requirements? In fact, the *New York Times*, on the very day of CARA’s formation, reported that MPAA members were already editing their films down from an X rating before they were even officially rated. The newspaper stated that Paramount had removed some obscene dialogue from a prison film, *Riot* (1969), to get an R; the *Times* also reported that Michelangelo Antonioni would excise a four-letter word for copulation in the script for MGM’s *Zabriskie Point* (1970) if its inclusion meant an X. “The general view” in the industry, wrote *Newsweek* four months later, in February 1969, was “that, while nobody quite knows what draws an X rating, it is something to avoid.”

Even the commercial and artistic success of *Midnight Cowboy* (1969) failed to establish a trend in X-rated film production. *Midnight Cowboy*’s triumph, suggests Jon Lewis, had more to do with its kinship with prestige adults-only pictures like *Bonnie and Clyde* (1967) rather than with soft- or hard-core features like *I Am Curious* (Yellow) (1967) and *3 in the Attic* (1968), two other X-rated films in the top-twenty box office for 1969. By the end of the decade, too many “dirty” movies had already damaged beyond repair the adults-only rating’s commercial viability. In his 1972 book, *The Movie Rating Game*, former CARA intern Stephen Farber confirms the widespread avoidance of the X by 1970: “By now the X has lost whatever chance it might have had to achieve respectability,” he said. “Several studios have made it a policy to produce no X films, and most studio contracts with directors stipulate that the director must win an R or less restrictive rating on the finished film.” The X may even keep some films from being made at all. Farber identifies already-completed films like *Joe* (1970), *Hi, Mom!* (1970), and *Straw Dogs* (1971) as being cut by their distributors so they could be awarded an R.

At the same time that the MPAA signatories put policies in place to abolish the X rating as a business strategy, CARA further protected MPAA interests by instituting a new policy of its own to assure that more films could be awarded R ratings. In 1970 CARA raised the R and X age limits from sixteen to seventeen in order to absorb previous X-rated content into the R category. This bump, in the words of CARA chairperson Eugene Dougherty, was intended so that “no serious film-makers would want to go beyond the limits of the R.” The term *serious* appears to be CARA’s (or, at the very least, Dougherty’s) synonym for self-restraint, the responsible kind of entertainment Valenti envisioned for the Hollywood film industry. Indeed, no U.S.-produced, MPAA-distributed films actually did go beyond the boundaries of the R for a long time after 1970. Only auteur-driven foreign productions distributed by the majors carried the badge—Stanley Kubrick’s

The near abandonement of the X rating and the expansion of the age range for R pictures in 1970 also caught the attention of Variety at the time. The trade paper described 1970 as the year of the "wandering X and R," because of the number of films seemingly of X caliber that drifted over into R and, strangely, even into GP territory.28 Films like Women in Love (male frontal nudity) and The Boys in the Band (homosexuality) earned R ratings, whereas a year earlier they may have been given X ratings. Statistics support these claims. R ratings accounted for only 23 percent of films from 1968 to 1969 but rose to 37 percent from 1969 to 1970 and gradually increased through the early part of the decade, reaching a plateau of 48 percent from 1974 to 1975.29 As a result of these changes to MPAA and CARA policies, Valenti redesigned a system that was more inclusive of MPAA product while simultaneously promoting Hollywood as a responsible industry committed to making mass-audience films. The R rating became the tag that signified Hollywood, and the X became associated with U.S. independent and foreign art fare, as well as soft- and hard-core pornographic films. Writing in the Journal of the University Film Association in 1973, Julian C. Burroughs Jr. foresaw this strategy by the MPAA as a means of reducing criticism of its projects and staving off federal legislation. "The major motion pictures which are represented by the MPAA," he said, "will have to decide how far they are willing to follow the 'anything/everything goes' trend. To put it another way, as long as the majors—and others who would aspire to general public favor—allow good taste to play a significant role in their productions and promotions, they are not likely to lose the support of the majority of Americans."210

The following year, the Associated Press reported in April 1971 that "the day of the X rated film appears to be over" for the MPAA signatories. In this story Columbia Pictures reiterated its stance against releasing X-rated pictures, and James Aubrey, president of MGM, explained why his company no longer was in the business of making X films: "Everybody was caught in the newfound freedom. The industry wallowed in it. But while permissive films might have been successful six months ago, they aren't now."210 20th Century-Fox also abandoned X-film production after the back-to-back box-office bombs of the soft-core Myra Breckenridge and Beyond the Valley of the Dolls in 1970. "The board of directors decided then never again," said a Fox studio source, "not for all the money in the world." Even smaller, semilegitimate, independent distributors were abandoning the rating. Samuel Z. Arkoff, chairman of American International Pictures, remarked in May 1971:

"It's good business sense today to make only GS and GP's," and independent distributor Donald S. Rugoff admitted, "I never bought a film before with ratings in mind but I do now. The hassle just isn't worth it." How quickly the X became an anomaly for MPAA signatories is summed up by a Variety headline in July 1971: "WB acceptance of X for 'The Devil's a Rarity Nowadays for Major Film.'"

Even with MPAA-member unity over the branding of the X, Hollywood's new form of boundary maintenance could only succeed with the joint cooperation of NATO. Exhibiting adults-only pictures in legitimate first-run houses still gave the public impression that the MPAA sanctioned all these films, even if they were not reviewed and awarded an "official" X by CARA. The infiltration of adult-themed films, however, came at an inopportune time for the industry. As Justin Wyatt notes, in 1969 the majors suffered more than $200 million in losses, weekly attendance was almost one-sixth of its 1946 high, and "the youth 'revolution' served to feed the increasing freedom in terms of subject matter, further enhancing the marketability of the adult/porno feature."212 Abandoning the X might have been the last thing on the minds of NATO exhibitors at a time of floundering box-office receipts.

**NATO and the X**

On the day of the inauguration of CARA in 1968, New York Times film critic Vincent Canby reported that proponents of the rating system saw two possible reasons why it could fail, both related to the X: first, X-rated films would prove so successful that they would stimulate more production; and second, as a result, exhibitors might loosen their enforcement of the rating, inviting new calls for governmental censorship and putting pressure on the Rating Board to place limits on the number of X films released.213 He was right on both accounts. The X rating did prove to be a successful marketing category for distributors in the early years of CARA, and exhibitors were negligent in their handling of the adults-only category, igniting criticism and calls for reform of the rating system. To give rise to the era of responsible entertainment, the MPAA abandoned the product line altogether. NATO needed to recalibrate its box-office policy as well.

A new working relationship between the MPAA and NATO was absolutely mandatory after the Production Code since enforcement of the Code of Self-Regulation no longer fell on the shoulders of the distributors but on the theater owners themselves. In 1968 NATO made clear in the NATO News, a monthly bulletin available only to its members, that its shared responsibility with the MPAA for the system's success: "The local box office is the crucial
point at which the rating system will succeed or fail. No amount of publicity
or church support can guarantee the plan unless exhibitors themselves under-
stand it, enforce it at their theatres, and work to create favorable public opinion
in their communities. A lack of support on the part of theatre owners can only
serve to create the circumstances which encourage hard feelings and, ul-
timately, censorship.59 Enforcement would include checking IDs for X-
rated films, ensuring that children were accompanied by a parent for R-rated
films, patrolling theaters for children jumping screens, refraining from play-
ing an R- or X-rated trailer in front of a G- or M-rated feature, being aware
that the severest rating prevailed on a double feature, running the rating
trailer before each film, and educating theatre staff on the differences between
the ratings.

Some of the criticism of the rating system in its first few years can be
attributed to NATO’s failure to carefully implement these obligations, many
of which unsurprisingly centered on the X rating. Newspapers reported that
neighborhood theaters neglected to police the box office. For example, the
New York Sunday News found in July 1969 that underage children were being
admitted to X-rated films and that exhibition policies sometimes allowed X
trailers to accompany R films. The article reported the horror of one woman
who took her fourteen-year-old son to see the R-rated Goodbye Columbus
only to view the coming attraction of the X-rated I, a Woman II.68 In other
instances inattentive exhibitors showed X-rated trailers with G-rated films. It
certainly did not help that opportunistic distributors took advantage of the
new system at NATO’s expense by releasing films with two ratings—with and
without restrictive footage—to play for different audiences and theaters
across the country.77 The problems the X rating immediately posed to local
theater owners led to a plea in July 1969 by the Motion Picture Herald’s Char-
lie Poorman to exhibitors to forgo X-rated features altogether. “While it is
true that a powerful segment of the populace will patronize the maximum in
persion,” he said, “there is no industrial future in this.” He believed that the
X rating “doesn’t represent our best cinematic efforts” and suggested that the-
ater owners replay older films in lieu of “unsuitable” ones.38

Two months later, a survey conducted by Young NATO, a committee of
second- and third-generation exhibitors in the organization, reported that 47
percent of its respondents—who accounted for 89 percent of the nation’s
thirteen thousand theaters—automatically excluded X-rated films already
from potential engagements for their theaters. The survey also supported
claims that theaters carefully enforced rating restrictions, with 30 percent of
those NATO theaters playing X pictures to underage patrons.59 For at least
half of NATO’s members, banning X films avoided the expense of modifying
prints and trailers for local censor boards (most of which would cease their
operations by the mid-1970s). These costs, partially if not entirely, would fall
on the individual theaters. It also helped exhibitors to avoid community pres-
sure, especially if they could not properly promote an X film in the local
newspaper. Justin Wyatt viewed this split reaction to the economic opportu-
nity of adult film in NATO’s membership as reflecting a division along urban
and rural lines. Ever since the Miracle decision forced the MPAA to discontinue
exhibition and created numerous independent theater owners and
chains, small-town exhibitors were more reluctant to play adult pictures than
their big-city counterparts because of a lack of support from their communi-
ties.40 These policies corresponded with the growing number of newspapers
in small cities that refused to accept advertising for X films. While the news-
paper chains in urban centers (New York, Philadelphia, Chicago, Los Angeles,
and San Francisco) did not turn away advertisements, dailies and weeklies
(Birmingham, Chattanooga, Miami, Milwaukee, San Diego, Wichita) banned
X-rated ads to conform to the standards of their respective communities.41 In
November 1969 the MPAA listed twenty-three such newspapers that would
not take ads for X-rated films, a number that jumped to thirty-four news-
papers by July 1972 and included major metropolitan city newspapers such as
the Detroit News, Cleveland Plain-Dealer, Cincinnati Enquirer, and the Boston
Herald-Traveller.42

Community grievances, inconsistent exhibitor policies, and media bans
such as these fueled public concerns over the availability of obscenity to
minors and renewed calls for federal censorship of motion pictures. On
January 28, 1970, just prior to the release of the report of the President’s
Commission on Obscenity and Pornography, Valenti appeared before a sub-
committee of the Committee on the Judiciary in the House of Representa-
tives to oppose an impending bill to regulate local exhibition of theatrical
motion pictures. He reassured Congress that NATO overwhelmingly sup-
ported the rating system and that voluntary self-regulation on the part of the
film industry was the best course of action. Drawing from results of the
Young NATO survey, as well as the MPAA’s own recent study conducted by
the Opinion Research Corporation (a survey of CARA’s awareness and use-
fulness to parents that has been conducted every year since), Valenti
announced two principal revisions to the Code of Self-Regulation to clarify
the rating system to politicians, parents, and patrons at the box office. Men-
tioned earlier in this chapter, these revisions included the replacement of the
M, supposedly the least understood of the four categories, with the GP (all
ages admitted but parental guidance suggested) and the raising of the age
limit for the R and X categories from sixteen to seventeen.
Throughout his tenure Valenti would often make such cosmetic adjustments to the system of boundary maintenance, changes that were honest enough to placate Hollywood’s detractors but inconsequential enough not to endanger the economic and political interests of the MPAA. At this crossroads Valenti’s diversionary tactics obfuscated the MPAA’s overwhelming reliance on NATO for CARA’s success and effectiveness. He used the occasion not to criticize exhibitors, who were the linchpins of the rating system, but to lend his unwavering support for the medium’s First Amendment protection while also criticizing those “smut pushers,” “salacious pornographers,” and “fast buck peddlers of garbage” who infringed on the privilege of creative freedom for others. The fact that these “fast buck peddlers of garbage” found homes for their films at NATO theaters was unmentioned as Valenti’s closing remark at this hearing reified the rating system’s main objectives and its blueprint of responsible entertainment—“freedom of expression does not mean toleration of license”:

Too often, it appears to me, the public does not differentiate between the responsible filmmaker and the irresponsible. There is a difference, a decisively important one.

The responsible leaders in the motion picture industry will not permit this medium to be tarnished. Personally I shall never cease, whatever the cost, to fight for self-regulation and self-restraint. I shall condemn obvious and gratuitous trash no matter where it comes from or who cashes in on it.43

While Valenti could ensure that the MPAA carried out this responsibility through the self-regulatory operations of CARA, he still needed NATO theater owners to abandon any and all exhibition of X-rated pictures, many of which made more money than some legitimate Hollywood releases at the time.

That very same day, in the pages of a safer, less-public form—Variety—Valenti attacked Loews for eroding faith in the rating system. In this unprecedented criticism of a major theater circuit, he chastised the exhibition chain for booking the Danish sex film Without a Stitch (1970) in State I and Cine, two Manhattan first-run theaters. In no uncertain terms he made it clear to NATO that its members could not simultaneously be serving the needs of both sex voyeurs and a responsible community enterprise:

I told the chief executive of [Loews] that if other large, responsible theater operators decide to play this kind of film, then we are going to be witness to the death of quality exhibition in this country. The theater cannot have it both ways. The theater cannot be half quality and half smut.

If there is a proliferation of the quasi-porn film playing in first-class houses to the exclusion of product of wider appeal, we are in trouble.44

Following Valenti’s tirade, Tonlyn Productions, the independent distributor of Without a Stitch, filed a $30-million damage suit against the MPAA. The company claimed that Paramount head, Charles G. Bludhorn, told Loews that it would withhold its products from the chain if it continued to book X films from non-MPAA members. At the same time these bullying and perhaps illegal anticompetitive practices took place, 175 bills calling for film censorship or punitive actions against exhibitors were pending in state legislatures. Proposals ranged, for example, from official state film classification and bans on R and X trailers to taxes of five cents per G admission up to fifty cents per X admission.45 Although many of these bills were later found to be unconstitutional, they pointed to the X rating’s growing association with bawdiness and pornography by many legislators around the country. This, in effect, convinced more NATO members to abandon its use.

Valenti’s remarks to the U.S. House of Representatives and in Variety spelled out the MPAA’s commercial strategy in the age of classification: only CARA-certified films rated R or lower should play in NATO theaters. Films officially rated X (with or without serious artistic pretensions) and especially those without an MPAA rating (“unrated”) were greatly discouraged, since the outermost rating category and its unrated stepchild would always imply a violation of CARA’s responsibility to the “standards of the larger society.” The wedge driven between “quality” adults-only films and pornography, be they X or unrated, would forever distort the rating system, particularly for independent distributors. If they wanted access to the legitimate marketplace, they would have to play by the MPAA’s rules under the MPAA’s rating system in mainly NATO-owned theaters. In CARA’s first few years many independents had rated their films X for surefire booking. But rapid changes in public acceptance and taste toward the adults-only rating and “soft-core” compelled them to work with, rather than against, the rating system. As a result, more and more independent distributors started to comply with CARA, submitting their products for classification so they could secure bookings in better, more lucrative, houses.

Like the Production Code, the rating system eventually became a gateway to the legitimate film marketplace: a code of production, distribution, and exhibition serving the major players in the industry. In 1972 domestic theater admissions rose roughly 20 percent over the previous year, primarily because of The Godfather, leaving a seven-year slide, while total box-office revenues surged from $1 billion to $1.6 billion.46 At the same time that Hollywood rediscovered how to make money, the R rating solidified itself as a marker of responsible entertainment in the New Hollywood.
THE NAKED TRUTH

In 1972 Valenti’s repeated warnings to the MPAA signatories against producing and distributing soft-core films or irresponsible entertainment finally had an effect: Hollywood did not release any X-rated pictures that year. The abandonment of the adults-only product line certainly had an effect on the industry’s image. Variety, in its annual overview of CARA, noted that Hollywood’s sudden shift away from X-rated material effectively helped to reduce public criticism of the standards for its other categories. Obviously, the MPAA could never totally eliminate criticism of its members’ practices, but acceding to CARA the authority to excise potentially problematic material from “serious” adults-only films to accommodate an R rating accomplished two important things: it gave the appearance that the film industry was responsible and ensured that Hollywood’s products were available to audiences of all ages, R-rated guardian or no guardian. The development and maintenance of this practice created what I call the “Incontestable R,” an aesthetic and discursive framework that guaranteed all R-rated films to Hollywood’s audience as responsible entertainment.

Exhibitor cooperation was essential to the R’s incontestability, and many NATO members, particularly small-city exhibitors, pledged their allegiance to the rating system and the abandonment of the X. Still, certain NATO members continued to exhibit soft- and hard-core films with MPAA X ratings or self-applied X ratings until the middle of 1973. During that time hard-core films like Deep Throat, The Devil in Miss Jones, and Behind the Green Door were quite successful in the marketplace, outgrowing many Hollywood films. What finally secured an industry-wide commitment to responsible entertainment were a series of obscenity rulings handed down on June 21, 1973, by the U.S. Supreme Court under the leadership of conservative chief justice Warren Burger, appointed by Richard Nixon in 1969.

In the two cases most relevant to the film industry—Miller v. California and Paris Adult Theater I v. Slaton—the Court reaffirmed that obscene material—defined as the depiction or description of hard-core sexual content—had no protection under the First Amendment. In the five-to-four Miller v. California opinion the Court rejected the idea of the Warren Court’s national standard for defining obscenity, as well as its test for obscenity: “utterly without redeeming social value.” Instead, it gave power to the states to determine what constitutes obscene material under local, rather than national, community standards. A specifically defined state offense, wrote the Court, would be “limited to works which taken as a whole, do not have serious literary, artistic, or political value.”

In Paris Adult Theater I v. Slaton the Court upheld (again five to four) the rights of states to regulate exhibition of obscene material to consenting adults, even those theaters with restrictive admission policies for minors. It also ruled that constitutional doctrines of privacy in the home did not protect obscene matter in public places like adult theaters. These reinterpretations of obscenity law in relation to the First Amendment elaborated on the standards given back to the states in Miller v. California, leaving content regulation open to prosecutors in individual communities.

Local and state authorities quickly took advantage of these rulings, seeing them as an opportunity to legally attack serious, artistic pictures given Miller’s vague guidelines of what constituted obscenity. Most notorious was a ruling by the Georgia Supreme Court declaring the R-rated Carnal Knowledge (1973) to be obscene, even though it only contained brief nudity, some salty language, and no hard-core—real or simulated—sexual conduct. The U.S. Supreme Court, however, in a unanimous decision in Jenkins v. Georgia in June 1974, argued that the film “did not depict sexual conduct in a patently offensive way” and made it clear that under the Miller standards obscene material had to be “hard-core” sexual conduct. Despite this clarification, local district attorneys were already and would continue to be quite successful in winning legal injunctions against screenings of Deep Throat in various cities, such as Atlanta, Baltimore, and Memphis. Injunctions such as these effectively sealed the fate for hard-core film exhibition and the X rating in all but a few selected urban markets.

Thanks to the U.S. Supreme Court, the MPAA had almost exclusive control over the legitimate theatrical marketplace. Previously uncooperative NATO exhibitors, now completely vulnerable to this new obscenity standard, had no choice but to acquiesce completely to the rating system, whose MPAA-member distributors by this time had given up on the X rating. For both the MPAA and NATO the R rating would prove to be an incontestable bulwark in the absence of the X, serving as a seal of approval for responsible entertainment in the classification era. The birth of the Incontestable R, in effect, was the death of the Hollywood X.

Despite the Carnal Knowledge victory, proponents of free expression—especially critics and filmmakers—were not happy with the results of the Miller ruling or the MPAA’s response to it. A New York Times story in December 1973 echoed many disparagements directed at the MPAA during this time. Stephen Farber (who at that time regularly wrote articles about the rating system) and Estelle Changas (who interned with him at CARA) criticized the
MPAA for its reluctance to openly challenge Miller’s supposed infringement of the First Amendment, its readiness to avoid adult material, and its willingness to trim films down from an X to an R rating. They described a series of projects that either had been cancelled or altered in light of the Court’s decision. For example, a major distributor backed out of financing Arthur Hiller’s film of Hubert Selby Jr.’s violent street novel Last Exit to Brooklyn (later made in 1989) because of its financial risk factor. Additionally, Universal vice president Ned Tanen, Columbia producer Larry Gordon, and director Robert Altman all had rejected or considered rejecting scripts containing potentially controversial elements. “I was just reading a script that has a sexual scene with a young man and a prostitute—a comic scene,” Altman recounts. “And without even wanting to, I found myself thinking, ‘This is going to be a problem. How am I going to do it? Is it really necessary, and should it be done in a very explicit, funny way? But if I do it that way, I don’t know if it can be shown.’”

For Alice Doesn’t Live Here Anymore (1974) Martin Scorsese received a five-page memo from Warner Bros. detailing strategies for rewriting dialogue and for protection shots in case of objection by CARA, local communities, or television stations. One admonition read: “Love scenes must show ‘taste’ and not show lovers.” Such aesthetic and economic concessions to obscenity regulation, stated Farber and Changas, were “incompatible” with artistic freedom and according to Altman “actually spawned the acceptance of censorship” by the Hollywood community.

Valenti’s series of editorials and articles after the Miller decision clearly demonstrate the MPAA’s position regarding accusations of censorship in the rating era. Valenti would articulate a realistic stance condemning governmental infringement on the First Amendment, except in cases of hard-core pornography, while categorically denying that classification was a form of censorship. In a same-day response to the Farber and Changas piece Valenti lamented the Court’s decision on obscenity law (“We may curse it, defy, theorize it, but there it is. It won’t go away.”), but he called for action to assure that “serious, entertaining works of drama and comedy are not hauled into court” under an overly broad obscenity statute. He also assertively pronounced that the “MPAA rating board is not a censor,” that “it does not command (nor could it if it tried) any filmmaker to edit one millimeter of film.” Any decision to take a lesser rating to reach a larger audience, he believed, lies with the individual filmmaker, not with CARA, whose “sole objective is to give information to parents about the content of films so that parents can make decisions about their children’s moviewatching.” To Valenti industry self-regulation enabled creative expression, whereas the alternative—governmental classification—would quash it.

If critics like Farber and Changas overestimate the power that CARA wielded in regulating X-rated MPAA films almost out of existence in 1973, Valenti underemphasized the role that he, the MPAA, and CARA play in shaping the Incontestable R practice. In the eyes of Valenti, and there is no reason to doubt this, the X rating was a legitimate category. “[It] does not mean ‘obscene’ or ‘dirty,’” he frequently said. “X simply means unsuitable for viewing by children.” Valenti, though, never publicly condemned the industry’s avoidance of the X rating or endorsed its practice of the Incontestable R. The fact remains that he, as the president of the MPAA and overseer of CARA, was paid by the major film distributors to protect their economic and political interests. If responsible entertainment is the standard by which this is safeguarded, and if it is not inclusive of the X rating, so be it.

The MPAA was never a trade organization to defend artists’ rights or to ensure competitive markets anyway. The MPAA staved off classification for many years with an ineffective Production Code despite the awarding of First Amendment protection to motion pictures in the Miracle case. In addition, the MPAA also reintegrated distribution and exhibition through a collusive arrangement with NATO in the rating system twenty years after the Paramount decree. The abandonment of the X rating preserves this arrangement with CARA, its trusty knave of responsible entertainment. When Ralph Bakshi, director of the animated X-rated (though independently released) Fritz the Cat (1972) and Human Traffic (1973), claims he doesn’t “know of a single director who hasn’t been told not to make an X film,” he expresses the view that it is not necessarily the muscle of CARA that dictates the rules but rather the might of the MPAA signatories.

With the MPAA’s and NATO’s virtual abandonment of the X by 1973, it became the primary responsibility of CARA’s Rating Board to guarantee that all R-rated products—be they MPAA or independently distributed films—were free of X-rated residue before getting released in theaters. Some of the criticisms aimed at CARA during this time, however, were due to its inconsistent and unreliable policies for the X rating, as well as its other categories. Much blame has been assigned to chairperson Aaron Stern, a former rating consultant and psychiatrist on the faculty of Columbia University’s College of Physicians and Surgeons, who replaced Eugene Dougherty as head of CARA in July 1970. In Freedom and Entertainment Stephen Vaughn characterized Stern as “too judgmental, intolerant of dissent, and eager to please the Catholic Church.” Farber and Changas found him to be a “psychological crusader” against the “youth culture” of the time, handing out harsher ratings to movies if they contained “immaturity,” “rebelliousness,” or “liberal attitudes toward sex.” Stern also seemed mesmerized by his power as chair, helping to
edit films after their submission to CARA and frequently talking to the press about the rating system. It was this last point that particularly incensed Valenti, who wanted CARA to have only one voice: his own.55

Stern’s interest in the educative potential of the cinematic form, however, did not translate into a similar protection of the economic and political interests of the MPAA, the rationale for CARA’s existence in the first place. His public assaults against the X rating—against responsible entertainment—during his time in office must have been a major reason for his dismissal by Valenti at the end of 1973. In 1972, Stern told the Los Angeles Herald Examiner that “My strategy is to design a rating system in such a way that the only way you can have a more intrusive system is by defeating not only the constitutionality of the United States but the spirit of the government. If the rating system were called upon to defend itself as a noncensoring action, it could not defend itself. The fact that we keep somebody out of the theater is literally not defendable. I’m absolutely opposed to the X rating.”56 Unlike the U.S. Supreme Court, Stern believed children should not be denied access to films intended for adults, and unlike the MPAA signatories, Stern deplored the bargaining of shots or line of dialogue between producers and the Rating Board to get a particular rating. Given such comments, it is not surprising that Valenti later admitted he made a mistake in putting a behavioral psychiatrist in charge of CARA. “There were a lot of things we didn’t agree on,” Valenti said. “Nothing personal. It was his views on movies in general, demeanor, the ratings system, how he viewed certain things, the stance he was taking in the press, which was not consonant with the motives of the ratings system.”57

To restore harmony in the rating system, Valenti replaced Stern with Rutgers University communication professor Richard Heffner in July 1974, who remained the chair of CARA until the end of June 1994. Heffner’s personal disposition and approach to rating films could not be more different from his predecessor’s. Under his administration ratings were assigned to films by a majority vote of the Rating Board, who based their decisions not on moral or psychological precepts but on contemporary parental attitudes toward film content. And unlike the PCA or CARA before it, Heffner’s Rating Board did not assist in the editing of the films themselves; that task fell on the shoulders of filmmakers and distributors. It would appear that Valenti had found in Heffner a loyal and obedient chairperson, especially since the two lasted twenty years together. Their relationship, however, was often marked by disagreement and animosity, particularly involving the appeals process. The history of the Incontestable R through 1994 can be viewed, I believe, as a history of Rating Board decisions and Appeals Board reversals, of parental surrogacy and studio favoritism, of Heffner and Valenti. When the X was at stake, these contentions sometimes damaged, but never fully toppled, the bastion of responsible entertainment.

The Case of Cruising

When Heffner became chair of CARA in 1974, the era of the Incontestable R had officially begun. Variety announced in its November year-end report that “traditional film suppliers now avoid the X rating like the plague.”58 To be sure, none of the major Hollywood distributors released any X films in 1974. The rating was only self-imposed by pornographers or self-applied by independent distributors. Instead, all films from MPAA-member companies were geared to an R rating or less. This guaranteed all Hollywood products were once again permissible for an all-ages audience, stabilizing the rating system, which encountered little or no controversy until 1980 with Cruising.

Signaling a shift away from the X rating were certain industrial, cultural, and social changes that occurred in the mid-1970s. During this period of the “New Hollywood,” wrote Thomas Schatz, the art cinema movement that dealt with politically subversive, sexually graphic, or explicitly violent material—such as the auteur-driven, X-rated works The Devils, A Clockwork Orange, and Last Tango in Paris—ceased to be an economic force. Demographically, viewers were becoming younger and lacked the cinema literacy these adult films presupposed. The surge of mall-based theaters led to widespread policies prohibiting X-rated pictures. And the sudden success of Jaws (1975) “recalibrated the profit potential of the Hollywood hit,” ushering in an era of PG-rated high-concept blockbusters like Star Wars (1977) and Superman (1978).59

After Columbia’s Emmanuelle in 1974 and United Artists’ Inserts in 1976, the MPAA signatories released only two X-rated films until 1990’s Henry & June: United Artists Classics’ Arabian Nights (1975) and The Canterbury Tales (1972), both directed by Pier Paolo Pasolini and both released in the United States in 1979.60 During these intervening years CARA actively arranged all MPAA-member films into the R category; however, it did not necessarily arrange all these films into Incontestable Rs. These notorious cases could be described as “limit texts,” Lea Jacobs’s term for those films approved and released by the PCA that were subsequently condemned by external groups like state censors or the Catholic Legion of Decency.61 In the age of CARA these limit texts were R films “that felt like” X/NC-17 films (or PG-13 films “that felt like” R films, and so on) and were subsequently met with harsh reproach by filmmakers, distributors, and exhibitors, as well as special interest groups, moral reformers, and politicians.
59. For a discussion of these films’ negotiations with the Legion of Decency see Walsh, Sin and Censorship, 282–306.
60. Jowett, Film, the Democratic Art, 439.
61. The Legion of Decency changed its name to the National Catholic Office for Motion Pictures (NCOMP) on July 8, 1969.
63. Leff and Simmons, The Dame in the Kimono, 237.
64. Schumach, The Face on the Cutting Room Floor, 259.
65. See, e.g., the end of chapter 10 and all of chapter 11 in Leff and Simmons, The Dame in the Kimono; Van Schmus, interview, 192; and Jack Vizzard, See No Evil: Life Inside a Hollywood Censor (New York: Simon and Schuster, 1970), 159–171.
66. Vizzard, See No Evil, 162.
68. Jowett, Film, the Democratic Art, 439.
70. Ibid., 129.
71. Schumach, The Face on the Cutting Room Floor, 250.
72. These statistics are provided by Randall, Censorship of the Movies, 208.
74. See Leff and Simmons, The Dame in the Kimono, 252–253.
76. Leff and Simmons, The Dame in the Kimono, 265.
78. All references come from a fifteen-page pamphlet entitled “Code of Self-Regulation” published by the Motion Picture Association of America in 1966.
81. Richard S. Randall cites a Variety article that states that a proposal to eliminate the practice of MPAA-member studios releasing films through a subsidiary was voted down during deliberations over the draft of the 1966 Code. See Randall, Censorship of the Movies, 204.
86. MPAA, A Year in Review, June 1968, 23.
87. Only one major theater group, the Walter Reade Organization, refused to support classification because it believed the rating system was unconstitutional and would lead to government censorship. See Julian C. Burroughs Jr., “X Plus 2: The MPAA Classification System During Its First Two Years,” Journal of the University Film Association 23, no. 2 (1971): 45–46.

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7. Albert E. Van Schmus, interview by Barbara Hall, Academy of Motion Picture Arts and Sciences Oral History Program (1992), 102.
10. MPAA, Personal Statement of Jack Valenti (my emphasis).
14. MPAA, Motion Picture Production Code and Rating Program (my emphasis).
20. In 1970, only a year later, Paramount won an appeal against the X rating for Medium Cool, obtaining an R rating for the film.
24. Riot eventually was awarded an M and was criticized for its mindless violence and homosexual candor.
26. Lewis, Hollywood v. Hard Core, 153. United Artists self-imposed the X on Midnight Cowboy rather than officially being awarded the rating from CARA.
27. Quotation (“By now”), in Stephen Farber, The Movie Rating Game (Washington, D.C.: Public Affairs Press, 1972), 49, 50–51, 66–67. At this time scripts were still vetted by CARA, just as in the days of the PCA, but only in regard to the rating that it may receive on completion of the film.
29. A. D. Murphy, “A-Sign over MPAA Alphabet, Distriba Wanna Shun Risky ‘X,’” Variety, Nov. 25, 1970, 5. Even though the M (later the GP then PG) category was frequently a site of contestation in the early years of CARA, I hardly believe that films of X caliber found their way into this rating. Variety does not provide any evidence for this assertion.
30. Wyatt, “The Stigma of the X,” 244; Lewis, Hollywood v. Hard Core, 288. These statistics are drawn from data in Variety, which counts the MPAA calendar year as November to October since CARA was established on November 1, 1968.
34. Canby, “For Better or Worse.”


68. Charles Campbell, supervising sound editor of Cruising, described how 80 percent of the film was "looped"—the actors' dialogues were rerecorded—as a result of harassment by demonstrators during filming. See Clagett, William Friedkin, 250–251.


81. Quoted in Harmetz, "How 'Cruising' Received Its 'R' Rating."


84. Quoted in Pollock, "R-Rated Cruising." Also at the time Valentti said, "The board has rated over 5,500 films, and two out of 5,500 [the other being an obscure 1975