

Games, Film and Tv are very different mediums because they are based active and passive participation respectively. Even though they are different the way they are rated can largely still be the same. I play a lot of PC games that range from E to R rated games and I believe that most ratings are fair, or could even be relaxed allowing for broader classification based on genre/type of game. My two biggest concerns are changes that stifle freedom of expression and proper classification or distinction for games that use Loot Boxes and other simulated gambling mechanics in them. I do not believe there needs to be significant changes to ratings outside of “loot boxes”, but I like to see protections to stop cultural puritans from censoring games that are already rated MA or R.

There is a growing number of people that are attempting to censor games to make them “more appropriate” for the consumers. These people do not play the games but try to gain control over the creators’ intention/vision for the game by claiming they are too violent, sexual or “problematic”. I do not want the government to tighten how they rate games. From my understanding the game publishers send an example of what is their game to be rated. In my opinion publishers will lie through omission to receive a lower rating or will add content or predatory microtransactions into the game after launch. I believe that the government needs to be more active and responsive to changes that occur after the games launch. The government should keep the rating system as it is and potentially play a more active role in educating parents about what the classifications mean and why they are useful guidelines.

Loot boxes, gacha games, and predatory microtransactions need to be rated appropriately, labeled clearly and on the box what system they use e.g. loot boxes, gacha, microtransaction. What I have listed above is extremely different from purchasing DLC or being able to directly choose to buy a specific cosmetic item. During 2018 and 2019 a Star Wars game, published by Electronic Arts, called Battlefront 2 caused the tipping point where predatory monetisation practices that gamers had been fighting against spilled into the mainstream discussion. The FIFA and 2K basketball games doubled down on predatory “simulated gambling” and rating bodies overseas that are meant give them fair ratings are funded by the companies they are regulating. AAA games that consumers have to pay \$60-\$80 for have had content stripped and then resold with a random chance at acquiring or hamper the ingame experience to sell you microtransactions. Loot Boxes and Gacha systems are basically slot machines, they even use audio and visual cues, that guarantees you something that ranges from being useful to something that has no value in the game. FIFA and 2K basketball only have one way to acquire players which is through loot boxes, this means the only way for consumers to get a player they want is to potentially pay far more money than they used to buy the game. Studies have shown links between loot boxes and gacha systems and gambling (<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0213194>, <https://royalsocietypublishing.org/doi/10.1098/rsos.190049>) yet they are not restricted or regulated. A simple making on the packaging saying “ingame purchases” is misleading because of the differences between a loot box and being able to just buy the item you want. An example of what I mean would be “Progression based transactions included” or for loot boxes actually including “Simulate Gambling” on the packaging.

Ratings for games targeted or have a player base of mostly teens and children should also be given a higher rating if they allow in game purchases with real money, including buying ingame currency with real money. In my opinion games like Fortnite need to have additional verification for in game purchases and parental controls on spending limits to prevent children accidentally spending money since they don't have a proper grasp on what they are doing. A quick google search will return numerous stories about children spending a lot of money on "simulated gambling" or ingame items because the parents If a game targeted at children wants to have a low rating it should be required to have clear and usable parental controls and no predatory monetisation.

What I want to see out of changes to the rating system is both fair and reasonable for consumers. I feel that how microtransactions, loot boxes and other ingame purchases are handled needs to be reviewed and have specific and clear packaging. The government also needs to be proactive by educating parents, updating ratings and fining companies that attempt to avoid appropriate ratings by adding in things after launch. The rating system needs to reflect the differences between game genre and the base pricing of a game and how companies monetise them.