

**Robert Wood Johnson Foundation
Center to Prevent Childhood Obesity**

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Federal Trade Commission
Office of the Secretary
Room H-135 (Annex J)
600 Pennsylvania Ave., NW
Washington, DC 20580

**Comments to the Federal Trade Commission from the Robert Wood Johnson Foundation
Center to Prevent Childhood Obesity**

Re: Food Industry Marketing to Children and Adolescents Study: Paperwork Comment;
Project No. P094511

The Robert Wood Johnson Foundation Center to Prevent Childhood Obesity (the center) appreciates the opportunity to provide recommendations to the Federal Trade Commission (FTC) in response to the federal register notice regarding data collection on food and beverage marketing to children and adolescents (Federal Register, Vol. 74, No. 181, Sept. 21, 2009).

The FTC's 2008 report, "Marketing Food to Children and Adolescents: A Review of Industry Expenditures, Activities, and Self-Regulation," provided critical information into marketing practices by the food and beverage industry. This follow-up study will continue to add to and expand upon our knowledge of food and beverage products marketed to, as well as marketing practices aimed at youth.

The food and beverage marketing landscape has changed significantly, on a number of levels, since the FTC last requested data from food and beverage companies. Marketing in general, food and beverage marketing in particular, and the mechanisms in which marketers reach youth have greatly expanded. The emerging digital media practices coupled with new research techniques used by food and beverage marketers, make the FTC's upcoming data collection and research efforts even more important to expanding our knowledge-base in this area.

The attached document (Attachment 1) provides FTC with specific questions we urge be included in the next round of inquiries to food and beverage companies, and mirrors those put forth by the Food Marketing to Children Workgroup, comprised of individuals representing local, state, and national child advocacy and health organizations.

In addition, the center has compiled a number of resources we hope FTC will consider as it continues the important deliberations and discussions regarding food and beverage marketing to youth. These resources are included in Attachment 2.

Sincerely,

Joseph W. Thompson, MD, MPH
Robert Wood Johnson Foundation Center to Prevent Childhood Obesity

The Robert Wood Johnson Foundation Center to Prevent Childhood Obesity is a national organization dedicated to reversing the childhood obesity epidemic by changing public policies and creating healthier environments in schools and communities. The center helps to shape and coordinate the efforts of policy-makers, advocates and community organizations by identifying and promoting the most promising obesity-prevention strategies and supporting the nationwide movement to improve food and physical activity environments.

www.reversechildhoodobesity.org.

Attachment 1
New Questions for the Federal Trade Commission Inquiries to Food and Beverage Companies from the Food Marketing to Children Workgroup

Based on the dramatic changes in how marketers reach children and adolescents today, the Food Marketing to Children Workgroup recommends the following questions be integrated into the Commission's existing framework so that the FTC's research can accommodate new marketing and market research practices.

- A. *Data on children's and adolescent's exposure to measured media, online marketing and advertising and mobile marketing.*
1. Exposure Data
 - a. What is the size and demographic makeup of audiences who receive marketing messages?
 - What is the distribution by age group, including 2-5, 6-11, 12-17 and 18-49?
 - What is the exposure to measured ethnic and racial minority populations?
 - All information should include exposure time as well as impressions.
 - Media for which audience measures are unavailable or incomplete should be specifically identified.
 - b. For measured media (radio, TV, print):
 - What are the Gross Rating Points (GRP, for television), including reach and frequency?
 - What is the distribution by age group, including 2-5, 6-11, 12-17 and 18-49?
 - What are the figures for ethnic and racial minority populations?
 - c. For Web sites:
 - For websites such as www.postopia.com, which are designed to attract and establish a strong association between a child and the brand, provide complete metrics about the number of users and their ages, unique visitors per day, time spent on the site, etc.
 - How many average monthly unique visitors?
 - What is the unique visitors distribution by age and race/ethnicity?
 - How many average visits/month and how many minutes per visit?
 - What is the total traffic, and the traffic generated from paid search words?
 2. Expenditure Data - New Media: Websites, Internet, Digital and Viral Marketing
 - a. Paid Search Expenditures
 - What search terms were bid on and acquired, including for Google (which owns YouTube), Yahoo, and MSN?
 - What forms of rich media were used, and who were the vendors?
 - What ad networks were used?
 - How much was spent on search and display advertising, including for mobile?
 - What positions were acquired on search pages and what kinds of ads were bought (IAB formats)?

- b. Email marketing expenditures
 - How much was spent for email marketing, and what forms of tracking were used?
 - c. Mobile marketing expenditures on and other location-based marketing.
 - d. Digital out of home advertising expenditures.
 - e. Online videos.
 - f. Social media expenditures.
 - What investment has been done related to social media marketing applications, or apps? This would include on such platforms as Facebook and the iPhone or other smartphones.
 - g. Analytics (measurement of online data) expenditures.
 - Across all platforms, including mobile and online games.
 - Including ad effectiveness services [e.g. InsightExpress].
 - h. Behavioral targeting and other related database marketing expenditures.
 - i. Target market expenditures, especially African American and Hispanic children and youth.
3. Assess expenditure and exposure data together
- a. Compare the exposure of children and youth to marketing in various media with the amount spent on marketing in those media across all channels [measured, mobile, and online].
- B. *Data assessing the effectiveness of online and mobile marketing*
- 1. What work was done to analyze conversions of users on digital media?
 - 2. What ad effectiveness services were used, including for digital (such as InsightExpress)?
 - 3. Companies should report more information on the implementation of their self-regulatory marketing policies.
 - a. How much of their marketing, in absolute and percentage terms, in expenditure as well as in impressions and exposures, is covered by the definitions in these policies, and how much is therefore excluded?
 - 4. Companies should detail implementation, and detail how their advertising and product practices have changed via self-regulation.
- C. *Data delineating expenditures on in-house and contracted market research.*
- 1. What studies were done involving neuroscience and biometric measures, including functional Magnetic Resonance Imaging [fMRIs], eye-tracking, and other techniques?
 - a. In what ways was this research used for the development and deployment of advertising?
 - 2. What research techniques were used to determine how ads and marketing communications would affect ad industry metrics, including aided branded awareness, message association, brand favorability, purchase intent, and ad awareness?
 - 3. What research was used for making online advertising more effective, such as the use of landing pages and A/B testing?
 - 4. What information was collected and analyzed, including IP addresses?
 - 5. What services were used for analyzing and influencing social media, including social

media analytics?

- a. Describe the social media marketing efforts, including use of Facebook, YouTube, and Twitter.
 - b. Where were social ads purchased?
 - c. What profiles for targeting were acquired on Facebook and other social media?
6. What types of database and segmentation marketing were used, such as those available from Acxiom?
 7. What decision-management technology was used in marketing?
 8. What is the demographic composition of participants in market research, including identifying the age of any children or adolescent participants? What are the procedures for obtaining participants' consent, particularly for minors?
- D. *Data assessing the effect of traditional media using new measurements*
1. What research has been done to assess exposure of children and adults to out-of-home and point-of-purchase advertising?
 2. What data are being collect from providers such as Nielsen Media Research measuring screen exposure across platforms?
- E. *Data assessing the integration of food promotions and cause marketing*
1. For Restaurant Foods (Served in QSRs):
 - a. What are the specific products promoted in their advertising (e.g., kids meals, value meals, specific sandwiches, etc.)?
 2. For cause marketing
 - a. What are the programs in which food and beverage companies participate or are primary sponsors? What is the company's participation in cause marketing based on environmental, educational, disaster relief or other efforts? What related materials has the company produced for which children are an intended target audience?

Attachment 2 Food Marketing Resources

National Policy & Legal Analysis Network to Prevent Childhood Obesity (NPLAN): [Creating a Healthy Food Zone Around Schools.](#)

NPLAN. [Model Healthy Food Zone Ordinance.](#)

NPLAN. [Restricting Food and Beverage Advertising in Schools.](#)

NPLAN. [First Amendment Implications of Restricting Food and Beverage Marketing in Schools.](#)

NPLAN. [District Policy Restricting Food and Beverage Advertising on School Grounds.](#)

NPLAN. [District Policy Restricting the Advertising of Food and Beverages Not Permitted to be Sold on School Grounds.](#)

Rudd Center for Food Policy and Obesity. [Cereal FACTS \(Food Advertising to Children and Teens Score\) Report.](#) Rudd Center. [Cereal FACTS \(Food Advertising to Children and Teens Score\) Web Site.](#)

RWJF Center. [Food Marketing to Children Toolkit.](#)

Center for Science in the Public Interest (CSPI): [Food Marketing to Children: State and Local Policy Options.](#)

CSPI. [Guidelines for Responsible Food Marketing to Children.](#)

CSPI. [Model City Resolution on Food Marketing Aimed at Children.](#)

VERB: A Center for Disease Control and Prevention Youth Media Campaign
<http://www.cdc.gov/YouthCampaign/>

Berkeley Media Studies Group (BMSG): [Fighting Junk Food Marketing to Kids: A Toolkit for Advocates.](#)