



11950 Democracy Drive
Suite 600
Reston, VA 20190

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580

June 24, 2011

Re: Interagency Working Group on Food Marketed to Children: FTC Project No. P094513

To Whom It May Concern:

comScore, Inc., would like to file this comment in opposition to a prohibition on food advertising to individuals under the age of 18. It is comScore's understanding that marketing to all age categories will be impacted because of the restrictions that would come into effect if 20% of the audience of a television program, for instance, were comprised of teenagers. It is unclear to us how the FTC would measure audiences.

In addition to the measurement question, comScore believes that marketing messages will have to be made less universal to exclude the possibility that they may appeal to teenagers and children and therefore trigger additional obligations. A marketing campaign directed at a less generalized audience would require more resources from companies who are already resource-constrained in the current economic climate. And any less-generalized campaign would not necessarily advance the goal of reducing obesity in children because the product to be advertised may meet other government standards for "healthiness."

Under new restrictions, companies will not be allowed to fully understand the appeal of their products in the complete marketplace for the purposes of future innovation. This gap in research will be a byproduct of a reduced data set that occurs when an age group is excluded.

We believe that this proposal has the potential to disproportionately inflict economic harm while restricting appropriate marketing.

Sincerely,

Gian M. Fulgoni
Executive Chairman and Co-Founder
comScore, Inc.