



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of Advertising Practices

January 8, 2018

Tina Poturica-O'Neill, Esq.
Children's Advertising Review Unit
112 Madison Avenue, 3rd Floor
New York, NY 10016

Re: CARU Referral for UCool Heroes Arena App Television Advertising

Dear Ms. Poturica-O'Neill:

I am writing to follow up on CARU's referral to the FTC of its compliance proceeding involving television advertising for UCool's Heroes Arena virtual world app. Your referral indicated that a 15-second commercial for this app, featuring game footage such as players battling with weapons, aired on the Disney XD Programs "Bolt" and "Marvel's Avengers." You expressed concern that promoting this app during children's television program violated children's advertising guidelines because the Apple App Store rated the app for users 12+ and the developer's notice in the App Store stated users "must be at least 13 years of age to play or download Heroes Arena." Because UCool declined to participate in CARU's self-regulatory program, you referred this matter to the FTC for our review.

Upon receipt of your referral, staff contacted UCool with regard to this specific commercial. The company agreed to cooperate with CARU's inquiry. From communications with you, we understand that UCool has cooperated with CARU's inquiry and represented that it discontinued disseminating the challenged ad. We also understand that UCool represented to CARU that it has no plans for future advertising during children's television programming.

Upon review of the matter, we have determined not to take additional action at this time. The FTC reserves the right to take such further action as the public interest may require. The FTC fully supports CARU's self-regulatory process, and we appreciate your referral and the opportunity to continue to assist in supporting CARU.

Very truly yours,

Devin W. Domond
Chief of Staff for Advertising Practices

Cc: Claude M. Stern, Counsel for UCool