

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

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

To Whom It May Concern:

Analytic Partners is submitting this Comment to express our concerns about the rationale behind the proposed ban on advertising virtually all foods to children and adolescents. Analytic Partners consults with many companies in the food industry on, among other things, advertising effectiveness.

We strongly support the fight against childhood obesity. However, we fail to see how banning the advertising of foods will solve this problem. All the evidence we have seen shows that food advertising has been declining while, at the same, obesity has been on the rise. Additionally, similar restrictions on advertising in other countries have not produced any satisfactory results.

Banning advertising is an extreme measure. Before going down that road, it would seem that the government should first be able to demonstrate with credible evidence that a prohibition on advertising of the foods most commonly advertised to children and adolescents will actually reduce childhood obesity. The Working Group's proposal includes no such evidence.

Indeed, the banning of advertising will only serve to reduce the amount of information available to families, and any ban will have a direct negative economic impact on multiple advertising-related industries and the people employed in these industries.

Sincerely,

Nancy L. Smith
President
Analytic Partners, Inc.