

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:

Skybridge Marketing Group is committed to driving growth with our clients, among who include companies in the food industry. We have learned about the IWG's proposed advertising ban and are deeply troubled by the drastic changes recommended for the marketing of food products. We are submitting this comment to register our strong opposition to the proposal.

One of the most troubling aspects of the proposal is the way in which it is being done -- through nominally "voluntary" standards. We suspect that the agencies realize that the food industry will have no choice but to attempt to adhere to the will of the agencies that most closely regulate its business. So the agencies have achieved the effect of significant regulation without subjecting the rules to the scientific, economic, and constitutional review to which real "regulations" are subject.

Though a clever tactic, it strikes us as a first step down a very slippery slope. After all, what will prevent the government from subjecting other industries to this sort of approach? What other advertising might the government ban?

Let us be clear: we fully support the fight against child obesity. But we fail to see how a ban on food advertising will help the cause. Indeed, all the evidence we have seen indicates that food advertising has been declining in recent decades while obesity has been on the rise. And food advertising bans in other countries have not reduced the incidence of obesity in children.

Before the fairly radical step of banning advertising, it seems that the government would need strong evidence of the link between food advertising and childhood obesity. The proposed guidelines fail to provide any evidence of this.

We strongly oppose the IWG proposal -- it is not voluntary and it is not clear that it will have any impact whatsoever on the problem it purports to solve: child obesity.