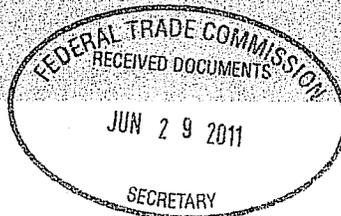


ORIGINAL



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6.20.11

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:

These comments are in response to the proposed restrictions on food advertising. Zeus Jones is a small interactive marketing agency located in Minneapolis, Minnesota. We provide marketing support for many several food brands, including Cheerios. We strongly oppose the proposed restrictions because they would effectively ban advertising for many healthy products—including Cheerios—which would have absolutely no impact on childhood obesity. In fact, it would do more harm than good.

Because of our work with Cheerios, we are well aware of the significant public health benefits associated with ready-to-eat cereals. And because cereals are the products most advertised to children and adolescents, cereals will be the food product most affected by the restrictions that this working group is proposing. Cereals provide—for a relatively low amount of calories—many important nutrients to children's diets. For example, cereal delivers 40% of children's calcium intake. What's more, scientific studies have consistently shown that cereal eaters tend to be less overweight than non-cereal eaters. How, then, can these proposed restrictions be justified?

Also, as a marketing agency, we are concerned by just how broadly the restrictions define marketing activities that are "directly targeted" at children. Take websites. Advertising for food products that do not meet the working groups nutrition standards could not appear on websites where as little as 20% of the audience consists of adolescents or if the website uses "adolescent-oriented animated or licensed characters" or features "a celebrity highly popular with adolescents"—even if the advertising is intended to directly target adults. In addition to improperly restricting advertisers' ability to direct commercial messages to adults, this would effectively mean the end of "all family" advertising. This is unacceptable and unworkable.

We urge the working group to abandon its proposed advertising restrictions.

Respectfully,

Adrian Ho
Partner