

Dear Mr. Chairman and Members of the Commission,

I am an employee of Campbell Soup Company, a leading U.S. manufacturer of healthy foods and beverages. My company has been an industry leader in worthwhile efforts to combat childhood obesity. For example, Campbell is the only corporation in America with an executive devoted full time to combating childhood obesity and hunger. We encourage kids to exercise and lead healthy lifestyles through a number of programs, including "Team Xtreme" at goldfishfun.com and "Together Counts"—a social media campaign supported by the Healthy Weight Commitment Foundation.

I am writing to express my concern about proposed guidelines for food marketing and advertising to children and teens published on April 29, 2011 by an Interagency Working Group ("IWG") comprised of your agency, the US Department of Agriculture, the Food and Drug Administration, and the Centers for Disease Control. Although these guidelines seek to promote a worthy goal in which we wholeheartedly share, they do so in a manner that is misguided and that will be counterproductive.

- The proposed guidelines are based on nutrition standards that are virtually unachievable. They describe products that manufacturers will not produce because children and teens will not eat them. As a practical matter, therefore, implementation of these guidelines will essentially prohibit the marketing and advertising of foods and beverages to persons under age 18.
- The guidelines will also substantially limit communications intended for adults. In fact, if as little as 20% of the audience for a communication is composed of persons ages 12-17, the communication will be considered "marketing to children" and must therefore satisfy the guidelines' draconian standards. As a result, many communications plainly intended for adults will no longer be permissible.
- The guidelines prohibit advertising of products that meet the regulatory definition of "healthy," including foods promoted by the Department of Agriculture as part of the US Dietary Guidelines and the Women, Infant, Children (WIC) program. It makes no sense for the government to prohibit the marketing to children and adolescents of foods that its own regulations recognize as healthy.
- Because the proposed definition of advertising and marketing is so broad and the guidelines are so restrictive, they will also end food company sponsorships of many popular school and youth athletic programs, thus undermining their stated purpose of combating childhood obesity

Seventeen major food advertisers in the U.S., including Campbell, currently participate in the Children's Food and Beverage Advertising Initiative (CFBAI), a voluntary industry initiative launched five years ago. The advertising and marketing standards developed through this initiative have resulted in real changes in foods marketed to children. They have also inspired many companies to alter their advertising content and mix to promote healthier products, and to eliminate some advertising altogether. New research by Georgetown Economic Services indicates that food and beverage advertising on children's television programming decreased by 50 percent between 2004 and 2010. It is unfortunate that the IWG has chosen to disregard the successful CFBAI program.

I respectfully request the FTC to withdraw these guidelines.

Thank you for your consideration.