



**Michael D. Maves, MD, MBA**, Executive Vice President, CEO

May 17, 2007

Deborah P. Majoras  
Chairman  
Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex J)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Re: Food Industry Marketing to Children Report: Paperwork Comment;  
FTC File No. P064504

Dear Chairman Majoras:

On behalf of our physician and medical student members, the American Medical Association (AMA) appreciates the opportunity to respond to the Federal Trade Commission's (FTC) April 18, 2007, *Federal Register* notice requesting public comment on proposed information requests to food and beverage companies and quick service restaurants. The AMA strongly supports the Commission's efforts to gather information regarding the nature and extent of, and expenditures on, food industry marketing activities that are targeted at children and adolescents, especially in light of the dramatic increase in the prevalence of obesity and type 2 diabetes in children and adolescents.

The FTC proposes to issue "compulsory process orders to major food and beverage manufacturers, distributors, and marketers and quick service restaurant companies for information concerning, among other things, their marketing activities and expenditures targeted toward children and adolescents." This information is required in order for the FTC to prepare a comprehensive report on this topic as requested by Congress. The FTC also proposes to "collect information from major marketers of fruits and vegetables to ensure that data are gathered regarding efforts to promote consumption of these foods among children and adolescents."

We support the goal of the proposed Section 6(b) Orders to conduct a comprehensive review of the categories of food products, the specific brands, and sub-brands or brand variants that companies market to children and adolescents, including "healthier" processed food

products and whole fruits and vegetables. We also commend the inclusion of FTC requests for information on measured and unmeasured media techniques and expenditures, as well as information about specific marketing activities in unmeasured media regardless of the level of financial expenditure of the activity. Likewise, information on the marketing policies, initiatives, and research pertaining to food and beverage marketing will allow the FTC to fully capture current trends in the marketing of foods to our nation's youth. The collection and analysis of such data will provide valuable information to Congress and the American public about the extent to which various foods are marketed to children and adolescents.

The Institute of Medicine (IOM) report, *Food Marketing to Children and Youth: Threat or Opportunity?* (December 2005), found that the majority of food and beverage products marketed to children are high in calories, sugars, sodium, and fat, and low in micronutrients. This is of concern because, on average, children and adolescents are consuming higher than recommended quantities of calories, sodium, added sugars, total fat, and saturated fats, and lower than recommended amounts of fruits, vegetables, whole grains, fiber, and several micronutrients, including calcium, potassium, and magnesium. Of even greater concern is the disparity in dietary quality among children of poorer socioeconomic status, who are also at greater risk of obesity and other health-related concerns.

The IOM report concluded that food and beverage marketing to children aged 12 years and younger encourages them to choose calorie-dense nutrient-poor products. The IOM report found that more data is needed to determine the effect of marketing on food and beverage consumption in youth aged 12-18 years. As children are exposed to marketing through multiple sources, with increasing frequency and from a young age, it becomes difficult to fully understand the impact of such marketing without complete data. As noted in the IOM report, more data is particularly needed for unmeasured media, which includes product placement, character licensing, special events, and advergames.

While several food and beverage companies have organized voluntary, self-regulating review boards (e.g., Children's Advertising Review Unit and the Council of Better Business Bureau's Food and Beverage Ad Initiative), these boards have led to policies and practices of varying quality. With comprehensive data, the FTC report will be able to provide an essential external review of the adequacy and efficacy of these self-regulatory processes.

In conclusion, the AMA supports the FTC's proposal to obtain comprehensive information from food and beverage manufacturers, distributors, marketers, and quick service restaurant companies about their marketing activities and expenditures directed at children and adolescents, including the types of foods marketed (including specific brands and sub-brands) and media used (both measured and unmeasured media). The collection of this data and the FTC's ensuing report will provide valuable information on how we can best improve the health of our nation's youth.

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Thank you for considering our views.

Sincerely,

Michael D. Maves, MD, MBA