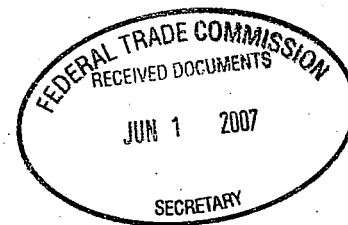


May 18, 2007

Office of the Secretary
Federal Trade Commission
Room H-135 (Annex J)
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580
(filed electronically)



Office of Management and Budget
Attention: Desk Officer for the Federal Trade Commission
(Via Fax)

Re: Food Industry Marketing to Children Report: Paperwork Comment: FTC File No. PO64504

We write in strong support of the Federal Trade Commission's upcoming study of food and beverage industry marketing activities and expenditures targeted to children and adolescents (*Federal Register*, Vol. 72, No. 74, April 18, 2007). In particular, we urge Congress and the FTC to request and analyze information on the extent and nature of firms' market research and target marketing activities focused on ethnic minority youth. Although obesity rates have increased for boys and girls within each ethnic and racial group, they have increased the most and are the highest for African American girls and Mexican-American boys (Ogden et al. 2006). U.S. national health examination survey data for 2003-2004 indicate that for children aged six to 11, 27% of African American girls are obese compared to the still very high 17% of non-Hispanic white girls and 19% of Mexican American girls. Among boys aged six to 11, 25% of Mexican American boys are obese compared to 19% of non-Hispanic White boys and 18% of non-Hispanic Black boys (Ogden et al. 2006). When a lower cut off is used to include children who have high weight levels but do not meet the obesity cutoff¹, the prevalence doubles. These disparities pose a major challenge for policy makers, the public health community and the food marketing industry (Kunanyika and Grier 2006). However, academic research on marketing and food-related perceptions among ethnically diverse populations is lacking despite the fact that these populations are growing in number (Population Reference Bureau 2006).

Although the public discussions of food and beverage marketing in the context of the obesity epidemic often note the higher levels of obesity among ethnic minority youth, ethnic target marketing is rarely detailed given a lack of relevant information. Thus, the *Food Industry Marketing to Children Report* represents an opportunity to gain information that may assist in the development of interventions to help curb the obesity epidemic among those most affected.

Our support for the need to request and analyze information on target marketing activities focused on ethnic minority youth is based on four key points, which are summarized below, and then detailed in the paragraphs that follow.

Key points:

- 1. Ethnic minority children likely have higher exposure to marketing strategies than majority children.**
- 2. Ethnic minority children may respond more favorably to ethnically targeted marketing strategies than do majority children.**
- 3. Marketing is not just advertising (e.g. it also includes product, distribution and pricing strategies), so one cannot consider advertising in isolation.**
- 4. There is limited research focused specifically on ethnic minority children and more is needed.**

Detailed Support

1. Ethnic minority children likely have higher exposure to marketing strategies than majority children. From a practical perspective, ethnic minority youth are an especially attractive segment for food and beverage marketers. Minority youth are growing faster than other youth, and are predicted to comprise almost half of all U.S. children in the next 5 years (U.S. Census Bureau). So, from a business perspective, minority youth are important to marketers.

Ethnic minority children may also have higher exposure to marketing promotions because they spend significantly more time with media (Roberts et al. 2005; Roberts et al. 1999; Woodard IV and Gridina 2000). One Kaiser Foundation report found that both Black and Hispanic children aged 2 to 7 year old spent at least 2 more hours per week with media than White children. [1999 report Table 8-c]. Another Kaiser report found that 8 to 18 year old Black youth spent 14 and ½ more hours per week watching TV, DVDs and movies than White youth, and that Hispanic youth spent 6 more hours. Further, minority children are exposed to promotions that are targeted to all children, those targeted specifically to minority children, and also those targeted to minority teenagers and adults (Moore 2004).

Ethnic minority children may also be exposed to a different mix of information than other children (Kumanyika and Grier 2006). Research has found that TV shows featuring African Americans have more food commercials than do general prime-time shows and that these commercials feature more candy, soda and snacks (Henderson and Kelly 2006; Otley and Tadasse 2006; Tirockar and Jain 2003).

2. **Ethnic minority children may respond more favorably to ethnically targeted marketing strategies than do majority children.** Research suggests that Black adolescents are more likely to pay more attention to and identify with Black characters and to respond more favorably to Black targeted ads (Aaker et al. 2000; Appiah 2004, 2001a, 2001b; Grier and Brumbaugh 1999). Advertisers use racial and ethnic cues such as minority models, ethnic symbols, linguistic styles and music to link cultural values, beliefs, and norms with the consumption of specific food products. For example, one campaign co-sponsored by a fast food company and a beverage company distributed black history materials in schools to black children. The frequency and resonance of identity-linked targeted marketing which promotes less healthful products may support the development of less healthful eating patterns and result in adverse health effects.

3. **Marketing is not just advertising (e.g. it also includes product, distribution and pricing strategies), so one cannot consider advertising, or even promotion, in isolation.** Food marketing strategies, may, in the aggregate, challenge the ability of ethnic minority consumers to eat healthy. Promotional strategies also include food industry sponsorships, partnerships with community-based organizations, in-school marketing, and street marketing. These techniques are used by the marketer to create long-term favorable associations with brands by embedding the product into children's lives. These techniques may not fall under the rubric of typical advertising and marketing guidelines. Further, while the research suggests differences in minority children's exposure to advertising, the salience of this advertising and the amount and types of food products advertised, marketing strategy also encompasses how accessible products are and what they cost. Many ethnic minority communities have fewer supermarkets and more fast food restaurants than white communities. Generally, minority children are more likely to live in communities with limited access to healthful food options (Kumanyika and Grier 2006). For example, the Food Trust in Philadelphia evaluated the snacks available in the corner stores in 5 minority communities that children frequent on their way to and from school. They found that only one carried low-fat milk and none had fresh fruits (Grier and Bryant 2005). Marketer distribution strategies may constrain the ability of ethnic minority children (and their parents) to purchase healthy food.

All these elements of marketing strategy work together to potentially create different "marketing environments" for ethnic minority children and may challenge parents' awareness of, and ability to provide healthier options for their children (Grier and Kumanyika, under review).

4. **There is limited research focused specifically on ethnic minority children and more is needed.** Most academic research on marketing strategies to children does not specifically consider issues that may be of particular relevance to ethnic minority children. For example, a systematic review on the effects of food promotion to children (Hastings 2003) examined over 100 articles, and fewer than five of the reviewed articles examined effects among ethnic minority children. And most of this research was more than 10 to 15 years old. Despite the limited academic research, there is a burgeoning commercial market research industry that studies ethnic minority youth to help develop and implement these strategies. Market research on ethnic minority youth is being done

by specialized firms for most of the major food and beverage marketers. However, this research is often proprietary to a particular company, or costly.

Given these observed differences regarding marketing to ethnic minority youth, it is imperative that Congress and the FTC request and analyze information on the extent and nature of firms market research and target marketing activities specifically focused on ethnic minority children. Such information will assist researchers, policymakers and marketers in developing interventions to ensure that food and beverage marketing plays a positive role in the health and well-being of ALL children.

Respectfully submitted,

Sonya A. Grier

Sonya A. Grier, PhD, MBA
Associate Professor of Marketing
American University
Kogod School of Business
4400 Massachusetts Avenue, NW
Washington, D.C. 20016-8044
griers@american.edu

Shiriki K. Kumanyika

Shiriki K. Kumanyika, PhD, F.D, MPH
Associate Dean for Health Promotion & Disease Prevention
Professor of Epidemiology, Departments of Biostatistics & Epidemiology
and Pediatrics (Nutrition)
Founder, African American Collaborative Obesity Research Network
University of Pennsylvania School of Medicine
8th Floor, Blockley Hall; 423 Guardian Drive
Philadelphia PA 19104-6021
skumanyi@mail.med.upenn.edu

References

- Aaker, Jennifer L., Anne M. Brumbaugh, and Sonya A. Grier (2000), "Nontarget Markets and Viewer Distinctiveness: The Impact of Target Marketing on Advertising Attitudes," *Journal of Consumer Psychology*, 9 (3), 127-40.
- Appiah, Osei (2004), "It Must Be the Cues: Racial Differences in Adolescents' Responses to Culturally Embedded Ads. In J. D. Williams, W. Lee, & C.P. Haugtvedt (Eds.)," in *Diversity in Advertising*. Mahwah, NJ: Lawrence Erlbaum Associates.
- Appiah, Osei (2001), "Black, White, Hispanic, and Asian American Adolescents Responses to Culturally Embedded Ads." *Howard Journal of Communication*

Research, 12, 29-48.

- Appiah, Osei (2001), "Ethnic Identification on Adolescents' Evaluations of Advertisements.," in *Journal of Advertising Research* Vol. 41: Cambridge University Press / UK.
- Grier, Sonya A and Shiriki Kumanyika (In Process) "The Context for Choice: Health Implications of the Food Marketing Environment of African-Americans, Manuscript under review
- Grier, Sonya A and Carol Eryant (2005), "Social Marketing and Public Health, Annual Review of Public Health," 26, 319-339.
- Grier, Sonya A and Anne M Brumbaugh (1999), "Noticing Cultural Differences: Ad Meanings Created by Target and Non-Target Markets," *Journal of Advertising*, 28 (1), 79.
- Hastings, Gerard (2003), "Review of Research on the Effects of Food Promotion to Children," in *Final Report, prepared for the Food Standards Agency*.
- Henderson Vanni, and Brigitte Kelly (2005) "Food advertising in the age of obesity. Content analysis of food advertising on general market and African American Television". *Journal of Nutrition Education and Behavior*, 37:191-196.
- Kumanyika, Shiriki and Sonya Grier (2006), "Targeting Interventions for Ethnic Minority and Low-Income Populations," *Future of Children*, 16 (1), 187.
- Moore, Elizabeth S. (2004), "Children and the Changing World of Advertising," *Journal of Business Ethics*, 52 (2), 161.
- Ogden, Cynthia L., Margaret D. Carroll, Lester R. Curtin, Margaret A. McDowell, Carolyn J. Tabak, and Katherine M Flegal (2006), "Prevalence of overweight and obesity in the United States, 1999-2004" *Journal of the American Medical Association*, 295 (13), 1549-55.
- Outley, Corliss and Abdissa Taddese (2006), "A Content Analysis of Health and Physical Activity Messages Marketed to African American Children During After-School Television Programming," *Archives of Pediatrics and Adolescent Medicine*, 160, 432-35.
- Population Reference Bureau, (2006), "In the News: U.S. Population Is Now One-Third Minority," (accessed April 19, 2007), [available at <http://www.prb.org/Template.cfm?Section=PRB&template=/ContentManagement/ContentDisplay.cfm&ContentID=13892>]
- Roberts, D.F., U.G. Foehr, and V.J. Rideout (2005), "Generation M: Media in the Lives of 8-18 Year Olds.," Kaiser Family Foundation.
- Roberts, D.F., U.G. Foehr, V.J. Rideout, and M. Brodie (1999), "Kids and Media @ the New Millennium.," Kaiser Family Foundation.
- Tirodkar, Manasi A. and Anjali Jain (2003), "Food Messages on African American Television Shows," *American Journal of Public Health*, 93 (3), 439-41.
- Woodard IV, Emory H. and Natalia Gridina (2000), "Media in the Home 2000: The Fifth Annual Survey of Parents and Children." PA: Annenberg Public Policy Center, University of Pennsylvania.