



November 21, 2006

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

Dear Chairman Majoras:

Thank you for allowing Community Anti Drug Coalitions of America (CADCA) to comment on the Federal Trade Commission's Federal Register Notice of proposed information requests (Section 6 orders) regarding alcohol advertising, and the marketing practices of alcohol manufacturers.

CADCA is pleased that the FTC plans to increase the depth of examination on alcohol advertising procedures to include brand-specific sales data. This will improve upon previously conducted studies and advance universal knowledge of the alcohol industry's practices at large, and for individual producers. This investigation will prove to be useful not only to the general public, but also the federal government and community-concern groups alike.

Given the potential influence that alcohol-related advertising can have on underage consumers, CADCA believes it would be beneficial to conduct a brand or company specific expenditure analysis. This would enable the FTC to better identify those companies that may be engaging in marketing tactics, specifically created to appeal to underage consumers. CADCA asks that the FTC consider undertaking such a study to determine if underage marketing segmentation by manufacturers has occurred<sup>1</sup>.

The proposed Section 6 orders will require that the demographics of the audience for each instance of advertising be broken down into two groups: persons under 21 and persons over 21. However, the 12 to 20 year age group is at the highest risk for underage consumption. In fact, studies have found that if drinking is delayed until age 21, a child's risk of serious alcohol related problems is decreased by 70%.<sup>2</sup> In light of this information, CADCA feels that accurately assessing youth exposure to alcohol advertising in the 12 to 20 year age group mandates greater attention, and that a specific focus on that age group could vastly improve the FTC's goal of determining the potential influence of underage advertising exposure. Furthermore, if advertising of this nature does exist, a specific focus on this age group can help determine the extent to which it affects youth perception

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<sup>1</sup>Although the FTC is constrained from releasing certain data due to trade secret or confidentiality reasons, we believe that reporting industry sales, marketing and promotional trends do not fall into the category of trade secrets, taking into account other companies such as Simmons, MRI, and Maxwell make that information available.

<sup>2</sup> Grant BF, Dawson DA. Age at onset of alcohol use and association with DSM-IV alcohol abuse and dependence: Results from the National Longitudinal Alcohol Epidemiologic Survey. *J Subst Abuse* 9:103-110, 1997

of risk or harm. This kind of information would be extremely useful, as research demonstrates the rates of use of any illegal drug, or for alcohol use are directly related to the perception of harm and social disapproval.

Thank you again for considering our views.

Sincerely,

Arthur T. Dean  
Major General, U.S. Army Retired  
Chairman and CEO