



American Society of Addiction Medicine

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November 20, 2006

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

Re: "Alcohol Reports: Paperwork Comment, FTC File No. P064505"

Dear Chairman Majoras,

Thank you for inviting comment on the Federal Trade Commission's proposed information requests to alcoholic beverage advertisers. The American Society of Addiction Medicine (ASAM) would like to offer the following remarks¹.

The incidence of alcohol abuse and dependency is a major national public health problem and one that is on the increase, particularly among adolescents. Children and adolescents are particularly influenced by what they see on billboards, in print advertisements and television or hear on the radio. ASAM believes, then, that the advertising of wine, beer and distilled spirits is a major force in the promotion of the use of alcohol.

While ASAM supports the breadth of the FTC study, in particular its expanded focus on marketing expenditures, advertising placement and targeting, and the methods by which the alcohol industry reviews itself, ASAM would like to suggest a few additional areas of inquiry.

Currently, alcoholic beverage advertising does little to define "drinking responsibly." The National Institute on Alcohol Abuse and Alcoholism (NIAAA) recommends no more than one drink per

¹ American Society of Addiction Medicine Public Policy Statement on Advertising of Alcoholic Beverages. Updated by the American Society of Addiction Medicine Board of Directors, December 2005.





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day for women and two drinks per day for men. We ask that the FTC explore not only what the alcoholic beverage industry is spending on social responsibility messaging but also how the industry develops those messages. Pro-health, pro-social responsibility messaging needs to be very clear to be effective at all. Like cigarette advertising, alcoholic beverage advertising should be advised to state, in no uncertain terms, that:

- Their products are not intended for consumers under the age of 21.
- Women should consume no more than one drink per day and that men should consume no more than two.
- “Certain people should not drink at all [including] people who plan to drive.”²

“Socially responsible” alcoholic beverage advertising is only that which is targeted at adult consumers and supportive of NIAAA standards of safe drinking levels. Again, we thank the Federal Trade Commission for the opportunity to submit comments supporting this important study and offer ASAM’s resources to the FTC in monitoring the advertising of alcoholic beverages.

Sincerely,

Elizabeth F. Howell, M.D., FASAM
President, American Society of Addiction Medicine

The American Society of Addiction Medicine is an association of 3,000 physicians dedicated to improving the treatment of alcoholism and other addictions, educating physicians and medical students, promoting research and prevention, and enlightening and informing the medical community and the public about these issues.

² Retrieved from the National Institute on Alcohol Abuse and Alcoholism website, www.niaaa.nih.gov. November 21, 2006.