

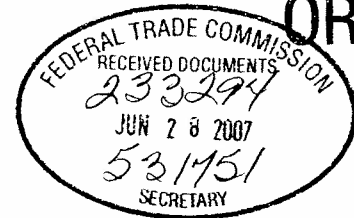


Campaign for a Commercial-Free Childhood

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June 28, 2007

Deborah Platt Majoras, Chairman
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Washington, DC 20580



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Dear Chairman Majoras:

We are writing to ask you to expand your investigation of marketing violent entertainment to children to include PG-13 movies like *Transformers*. The film is rated PG-13 for "intense sequences of sci-fi action violence, brief sexual humor, and language" by the Motion Picture Association of America (MPAA), yet it is being marketed extensively to children as young as two through licensed toys, food promotions, and advertising on children's television programming. We also ask that you work with the media and toy industries to develop a uniform rating system so that toys are marketed with the same age recommendations as the media that they are based on.

Transformers: A Case Study

A review by the Campaign for a Commercial-Free Childhood found that *Transformers* (DreamWorks, July 4, 2007) is being marketed extensively to children much younger than the MPAA's recommended age of thirteen for the movie.

Licensed Toys

The release of many blockbuster PG-13 movies, such as *Pirates of the Caribbean* or *Spiderman*, is often preceded by a line of licensed toys. While toymakers seek to capitalize on a movie's popularity, the toys – in turn – help create awareness of the movie. Often the toys and movie are promoted together; television advertisements for a toy may include a clip from the movie or an exhortation to see the film and a mention of its release date. For these reasons, licensed toys must be considered marketing for the film itself.

Hasbro, which owns the exclusive license for *Transformers* toys, has created an entire line of new toys and games for the *Transformers* movie. Every single one of the 129 toys and games listed at Hasbro's *Transformers* website comes with an age recommendation younger than the film's recommended age of thirteen.¹



¹ <http://www.hasbro.com/transformers/default.cfm?page=Products>. Accessed on June 26, 2007.

Seventy-two of these products (56%) are recommended for children as young as five; an additional thirty-two toys (25%) are recommended for children as young as four; thirteen toys (10%) are recommended for children as young as three. The age recommendation of these toys is likely to deceive parents into believing that the film is appropriate for young children.

Food Promotions

The release of films targeting younger audiences is frequently accompanied by film promotions featuring a movie's characters. While these promotions have come under increased scrutiny in recent years, the focus is usually on how the film helps promote unhealthy eating.² Less attention has been paid to the way in which these promotions and the marketing of these foods in turn promote the movie. As with toys, advertisements for food promotions frequently include clips from the movie and mention the film's release date.

There are a number of food promotions and foods tied to the release of *Transformers*. Burger King is giving away *Transformers* toys with a purchase of their Kids Meals. These toys are recommended for ages 3 and up.³ Kraft Foods is producing a number of *Transformers* themed Lunchables, a food geared to elementary and preschool children. The Kraft promotion includes a website with games clearly designed for younger children.⁴ CAP Candy is producing *Transformers* lollipops and gummy candy with age recommendations of three and up.⁵

Television Commercials

On June 25, 2007, CCFC recorded Nickelodeon from 6:00 to 8:00 PM EST. During that time, three advertisements were aired for *Transformers*. The first commercial ran during *Ned's Declassified*, a show which is rated TV-Y7 ("designed for children age 7 and above").⁶ The next two *Transformers* commercials aired during *Fairly Odd Parents* and *Jimmy Neutron*. Both of these shows are rated TV-Y ("appropriate for all children ... including children from ages 2-6").⁷

There were also two commercials for *Transformers*-related products. There was an ad for Burger King's *Transformers* promotion during *Ned's Declassified*. The commercial explicitly mentions the movie and ends with film's release date.⁸ There was also an ad for Hasbro's Starscream Blaster & Optimus Prime Blaster (ages 5+) during *Fairly-Odd Parents*. The advertisement included clips from the film.

In addition, Kraft has a *Transformers* commercial for Lunchables.⁹ The ad features animated young children who describe a Lunchables/*Transformers* toy promotion. Towards the end of commercial, one of the children says, "You can see *Transformers* in theaters - July 4, 2007" as a clip from the movie plays.

² See, for example, CCFC's review of the food promotions linked to *Shrek the Third*: <http://www.commercialfreechildhood.org/pressreleases/fireshrek.htm>. Accessed on June 26, 2007.

³ <http://www.bk.com/transformers/index.html>. Accessed June 27, 2007.

⁴ <http://www.kraftbrands.com/lunchables/index.aspx?area=HOME>. Accessed June 27, 2007.

⁵ <http://i32.photobucket.com/albums/d21/amspictures/moviemerch/PICT3846.jpg> and <http://i32.photobucket.com/albums/d21/amspictures/moviemerch/PICT3844.jpg>. Accessed June 27, 2007.

⁶ <http://www.tvguidelines.org/ratings.asp>. Accessed June 27, 2007.

⁷ Ibid.

⁸ The commercial can be viewed at <http://seibertron.com/news/view.php?id=10919>. Accessed June 27, 2007.

⁹ <http://www.youtube.com/watch?v=NMZtsIFyf0A>. Accessed June 27, 2007.

CARU and Advertising PG-13 Movies on Children's Television

The Children's Advertising Review Unit's Guidelines specifically state: "Advertisers should take care to assure that only age appropriate videos, films and interactive software are advertised to children."¹⁰ Over the past sixteen months, CARU has found advertising for five different PG-13 films during children's television programming. In each case, CARU issued a press release recommending that the offending film distributor refrain from advertising PG-13 movies during television programming for children. No disciplinary action was announced.¹¹

It is clear that PG-13 movies are routinely marketed to younger children. It is also clear that CARU's public "recommendations" are not enough to get companies to change their advertising practices.

With this in mind, we ask that you:

- Expand your investigation of marketing violent entertainment to include the targeting of PG-13 movies to younger children.
- Launch an investigation into the blatant and irresponsible marketing of *Transformers* to preschool children through toys, food promotions and television advertising.
- Work with the media and toy industries to establish a consistent set of ratings for toys and the media they are based on and to establish clear, enforceable guidelines for the marketing of PG-13 movies.

We look forward to discussing this matter with you further.

Sincerely,

Alvin F. Poussaint, MD

Susan Linn, ED

cc: Commissioner William E. Kovacic
Commissioner Pamela J. Harbour
Commissioner Jon Leibowitz
Commissioner J. Thomas Rosch
Secretary Donald Clark

¹⁰ <http://www.caru.org/guidelines/guidelines.pdf>, p. 11.

¹¹ The films were *Dead Man's Chest* (<http://www.caru.org/news/2006/PiratesRelease.pdf>); *Stomp the Yard* (<http://www.caru.org/news/2007/stomp.pdf>); *Superman Returns* (<http://www.caru.org/news/2006/supermanreturns.pdf>); *Harry Potter – Goblet of Fire* (<http://www.caru.org/news/2006/goblet.pdf>); and *Ultimate Avengers* (<http://www.caru.org/news/2006/lionsgate.pdf>). All press releases were accessed June 25, 2007.