From:	Jeffrey Chester ████████████████
Sent:	Saturday, November 03, 2012 1:17 PM
To:	Weinman, Yael
Subject:	Wash Post on kids marketing

see slideshow with McD and others as well: http://www.washingtonpost.com/business/technology/marketing-to-kids-what-makes-online-content-an-ad/2012/11/02/5a2a945c-2504-11e2-9313-3c7f59038d93_gallery.html

The Washington Post

When is a kids' online game actually an ad?

By Cecilia Kang, Published: November 2

Last spring, the International House of Pancakes launched an online children's game that was inspired by the Dr. Seuss classic "The Lorax." IHOP appeared to be serving up a hearty portion of advertising to children, too.

That was the conclusion of the ad industry's own standards police, the Children's Advertising Review Unit, which said IHOP's placement of menu items and its logo within the game made it too much like a commercial. The panel recommended last month that the firm disclose its marketing intentions to its young users.

But IHOP disagreed, saying the game was just for fun and didn't fit the traditional definition of an ad.

"We did not consider the game in question to be an advertising vehicle," the company, a unit of DineEquity, said in a statement, adding that it tries to be "sensitive to the issue of advertising to children."

The episode highlighted an increasingly thorny debate on how to monitor advertising aimed at children when they are confronted with so many new forms of marketing online.

If even the ad industry can't agree on the definition of an online ad, who can?

Kids spend more time than ever in front of screens beyond the living room television. Advertisers have responded with sophisticated ad campaigns that can start on the TV and then move to apps, social media sites and online games.

And federal regulators are struggling to keep up.

So far, the Federal Trade Commission doesn't regulate advertising to kids on these new platforms, except to ensure that marketing messages aren't false or misleading. The Federal Communications Commission limits ads on television but doesn't police the Web either.

That worries children's advocates, who say that the FTC and FCC may make distinctions but that to kids, a screen is a screen is a screen — and everything on it looks like entertainment to them.

"There is a great deal of research that shows children don't distinguish between content and advertising," said Kathryn Montgomery, a professor of communications at American University and an advocate of children's media protections. "Now on digital, there is the opportunity of more blurring of those lines, and the industry is pushing to keep definitions of online advertising broad and unclear."

Through these new digital channels, companies hope to cash in on some of America's biggest spenders. "Tweens," or children ages 8 through 12, are estimated to spend $43 billion a year out of their own pockets — and that's beyond the goods worth $155 billion or so that the kids pressure their parents to buy for them.

The IHOP Lorax promotion, for example, began with a TV ad that encouraged children to visit IHOP.com to participate in a sweepstakes promotion. Once they were on the site, the kids could see a video about a Lorax-inspired IHOP breakfast and play the "Save the Truffula Valley game," which promised that players who did well would get closer to "treating yourself and the Lorax to a delicious Lorax's breakfast at IHOP!"

Other companies follow the same strategy, where newspaper, radio, television and Web sites are used to get young users familiar with brands and products that they may buy on their own or pester their parents to buy.

Kellogg's Crunchy Nut cereal campaign earlier this year began with a TV tease introducing a new comical superhero described as "the man in yellow tights." Viewers were instructed to go to Facebook to learn more about the character and cereal.

"They have the strategy of reaching lots of kids by constantly bombarding them with brands," said Angela Campbell, a clinical education and communications law professor at Georgetown University who has filed a complaint accusing McDonald's and Subway of violating child privacy laws with their "tell-a-friend" Web games. "They want children to develop positive emotions about their brands early on."

That's also the case, ad industry experts say, with a new crop of informational advertising.

Procter & Gamble's "Being Girl" Web site, for example, has been lauded by the ad industry for creating a new category of online marketing with its portal chock-full of useful information and social networking tools tailored for developing girls. The site has articles about what girls can expect with their first period, how to talk with parents about menstruation, and the stages of physical development. It also advertises its Tampax and Always products — not only in what are clearly ads but also in casual references within advice columns.

Amid the swirl of marketing pitches, public interest groups say, there is lax oversight of digital marketing toward children. The FTC follows the lead of the Children's Advertising Review Unit, the self-regulatory body that monitors the Web and TV to ensure that ads are properly disclosed as marketing material to consumers.

When CARU can't get its industry members to agree to its actions, it refers cases to the FTC. In the case of IHOP's Lorax game, the promotion ended by the time CARU announced its findings.

"From the FTC standpoint, advertising can't be deceptive, and we think it is deceptive if an ad is not identified as an ad," said Mary Engle, an FTC attorney.

Fresh concerns about advertising to children online have reignited discussion of how children are more sensitive to marketing than adults.

CARU's panel of academics and former regulators says marketers have "special responsibilities when advertising to children or collecting data from children online. They should take into account the limited knowledge, experience, sophistication and maturity of the audience to which the message is directed."

Two decades ago, federal regulators recognized this difference and decided to put time limits on ads during children's television shows; the current limits are 10.5 minutes per hour on weekends and 12 minutes per hour on weekdays. The FCC also requires programmers to announce when a children's show is about to break for a commercial.

But determining just what content is an ad is much harder online than on television. On the Web, companies are able to embed marketing practices in more subtle ways. On Everloop, a social media site for children, brand campaigns are embedded into forums and pages on the site. Children can choose to become fans of pages such as designer Paul Frank's, in the same way a Facebook user can "like" Coca-Cola or Nutella fan pages.

One possible solution is printing disclosures. At the top of the colorful HappyMeal.com site, McDonald's displays in tiny letters: "Hey kids, this is advertising!" The site has 30 games for children, along with banner ads and promotions for its menu.

But the label is easy to miss, critics say. "It's unclear how useful these disclosures are. Their target audience often doesn't even read," Campbell said.

From:	Jeffrey Chester
Sent:	Wednesday, October 31, 2012 5:16 PM
To:	Ramirez, Edith; Brill, Julie
Cc:	Kestenbaum, Janis; Weinman, Yael; Lupovitz, Joni; Engle, Mary Koelbel
Subject:	$1.2 trillion/kids buying power, says ad firm
Attachments:	20121031_The-Next-Generation-of-Consumers.pdf

Oct 12, 2012...Publicis/Digitas
excerpt:

we did our research, talked to our kids, and then brought a panel of five preteens (ranging from ages 10-13) onstage on Wednesday to find out what they really think. ...

Today's little kids and tweens having buying power to the tune of **$1.2 trillion per year.** [1] ...

That $1.2 trillion figure isn't just about how much kids buy themselves—it also includes the degree to which they're influencing their parents' purchases. For instance, 60% of all tweens today have substantially influenced their parents' final decision on which car to buy...

Everyone on the panel either already had a cell phone or knew when they would be getting one. A couple of them cited cell phones as their main form of communication—but not via phone calls. It's all through text messages, Instagram, or other digital networks.
• When asked what social network they used the most, one girl specifically said Google+. She said that not a lot of her friends were on Facebook because that's where all their parents are—so they all use Google+ instead.
• We asked them if it's easy for them to hide what they do online from their parents, and a couple of them almost immediately replied yes—not reassuring for the parents in the audience. They said they either cleared their browser histories or just hid their phones.

THE NEXT GENERATION OF CONSUMERS

It goes without saying that a lot of brands are highly focused on reaching millennials. And why not? They fall into the sweet spot demographic of 18-34, and they're just hitting the workforce, so they have lots of new disposable income.

But in our research for FutureM, we found that what brands should really start planning towards isn't millennials—it's the generation that follows them. It's a generation that's thus far been unnamed, but is rapidly making their voices heard. Today's little kids and tweens having buying power to the tune of **$1.2 trillion per year**. [1]

What does that mean for brands and marketers? Well, it's impossible to truly predict exactly what this generation will do ten years from now, and what they'll buy. But as both marketers and parents, we did our research, talked to our kids, and then brought a panel of five preteens (ranging from ages 10-13) onstage on Wednesday to find out what they really think.

Here's what we observed, and predict:

THIS GENERATION IS MULTI-CULTURAL AND MULTI-INTEREST
Older cultural stereotypes are fading away—these kids wouldn't be surprised to see a vegan athlete who likes comic books. They're engaged in more ideas and interests than any generation before them.

Why? Because there's more opportunities available to these kids than any other generation. There's a ton of information at their disposal—digital has given them the tools to create anything they want. This generation is resourceful. They're makers. And because of that, brands need to be resourceful in the ways they try to reach them. We believe that these kids are going to make more and buy less, because they value that creation more than the actual purchase of a product. Brands will need to figure how to tap into that.

THIS GENERATION HAS MASSIVE INFLUENCE ON THE PURCHASING POWER OF ADULTS
That $1.2 trillion figure isn't just about how much kids buy themselves—it also includes the degree to which they're influencing their parents' purchases. For instance, 60% of all tweens today have substantially influenced their parents' final decision on which car to buy.[2] We've witnessed it in our own home: a big part of the reason we chose our new car was because the kids really liked the refrigerated center console, so that they could store their drinks and yogurt packs.

Our panel of tweens wasn't surprised. They admitted that it was pretty easy to persuade their parents into making purchases for them, be it a new case for their iPhone or a souvenir on vacation.

The fact is that we're treating our kids more like adults than ever before. In school and at home, they're exposed to more adult topics: discussions on poverty, war, the environment, and more. And because we're treating them more like adults, what we're seeing over time is that they're showing preference for adult things. When asked about their favorite brands, our panel replied H&M, Nike, and anything Avengers-related. They like the same brands that we do.

What does that mean for marketers? We believe that we'll see fewer multi-brands, and more mega-brands. We'll see less youth-specific offshoot companies, and that's okay. Because not only does this generation like the same brands that we do, but they're going to stick with them for a lifetime.
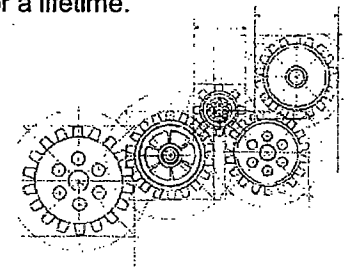
SOCIAL ALONE WON'T BE THE ANSWER

Social media plays a key role in reaching and engaging the next generation. But a social strategy doesn't equal social relevance—and relevance has a deadline. Brands today must be nimble and proactive, staying on top of what's trending in the news and what their audiences are talking about, so that they can stay relevant in the eyes of their consumers. That's the key to creating engagement.

We believe that this generation values experiences more than products. If your brand is playing a role in that experience, making it better, then they'll stick with it. But if not, they'll go elsewhere. Our panel of preteens bemoaned the fact that some of their friends post constantly on social networks when they don't actually have anything to say—they post updates just for the sake of posting. They also didn't like being bombarded with the same brand messages over and over again; to them, a video that's funny the first few times very quickly becomes stale and annoying. The takeaway is clear: brands need to focus on regularly providing fresh content that's relevant to their audiences, not content just for content's sake.

Here's some other interesting tidbits from our panel:
- Everyone on the panel either already had a cell phone or knew when they would be getting one. A couple of them cited cell phones as their main form of communication—but not via phone calls. It's all through text messages, Instagram, or other digital networks.
- When asked what social network they used the most, one girl specifically said Google+. She said that not a lot of her friends were on Facebook because that's where all their parents are—so they all use Google+ instead.
- We asked them if it's easy for them to hide what they do online from their parents, and a couple of them almost immediately replied yes—not reassuring for the parents in the audience. They said they either cleared their browser histories or just hid their phones.

[1] Lindstrom, Martin. "Tween marketing – it's no longer child's play!" ANA Magazine
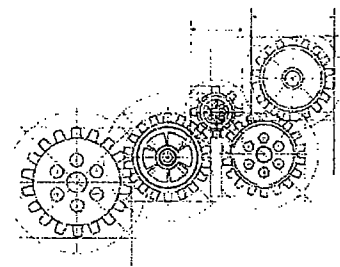
[2] Lindstrom, Martin. "Tween marketing – it's no longer child's play!" ANA Magazine

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This piece originally appeared on BostInno.

From:	Jeffrey Chester ███████████████
Sent:	Friday, November 02, 2012 11:34 AM
To:	DeLorme, Christine Lee; Weinman, Yael; Davis, Anna; Kestenbaum, Janis
Cc:	Vladeck, David; Engle, Mary Koelbel; Marcus, Phyllis; Kresses, Mamie; Angela Campbell; Kathryn Montgomery
Subject:	research on kids websites, composition, for COPPA proceeding
Attachments:	New Research Demonstrates Problem with Proposed New Definition of Child-Directed Websites.pdf; Kids Entertainment Fact Sheet Final jh_2.pdf

The Rudd Center at Yale subscribes to the comScore data service used by online marketers. We asked them to analyze comScore's "Entertainment-kids" product, which lists the leading child-directed websites (attached). Our attorneys at Georgetown University prepared an additional analysis reflecting questions we have raised in the COPPA proceeding about the definition of child-directed websites. We believe that the definition proposed by the Commission needs to be revised.

We are happy to discuss the research analysis and the specific definitional issues.

Many thanks,

Jeff

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1

New Research Demonstrates Problem with Proposed New Definition of Child-Directed Websites

The FTC has proposed to define a "Web site or online service directed to children" to include a commercial Web site or online service, or portion thereof, that:

> (b) based on the overall content of the website or online service, is likely to attract children under age 13 as its *primary audience*; or,

> (c) based on the overall content of the Web site or online service, is *likely to attract an audience that includes a disproportionately large percentage of children under age 13 as compared to the percentage of such children in the general population*; provided however that such Web site or online service shall not be deemed to be directed to children if it:

>> (i) Does not collect personal information from any visitor prior to collecting age information; and

>> (ii) prevents the collection, use, or disclosure of personal information from visitors who identify themselves as under age 13 without first obtaining verifiable parental consent;

In comments filed September 24, 2011, CDD *et al.* argued that because the italicized language is vague and undefined, many websites considered to be directed to children under current definition would no longer be considered child-directed under this proposed definition. The attached Rudd Center analysis, issued on October 17, 2012, clearly illustrates this problem.

The Rudd Center analyzed all websites classified by comScore as "Entertainment – Kids."[1] It used the comScore Media Metrix Key Measures Report to obtain the number of average monthly unique visitors to these websites during the first two quarters of 2012 for different age groups including ages 2-11 and 2-14.[2] Next, for each website with at least 100,000 unique child visitors (a total of 57 sites), the Rudd Center determined the percentage of unique visitors in each age group. The results are reported in Table 1. The Rudd Center concludes that the definition of child-directed sites as those with 30-35% of total visitors under age 12, which is used by members of the Children's Food and Beverage Advertising Initiative, does "not include many of the websites with child-targeted games and activities that are visited by large numbers of children."

This data also illustrates why CDD has concerns about the FTC's proposed definition. We start from the premise that the websites identified by comScore as "Entertainment – Kids" would be considered child-directed under the FTC's current totality of the circumstances test. As

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[1] A "dictionary team" from comScore examine websites and designates as kids' entertainment websites with activities and online games for children. comScore's methodology is relied on by advertisers who want to reach children.

[2] comScore does not have an age group 2-12, which corresponds precisely to COPPA's definition of children as under 13.

we explained in our comments, if the FTC fails to define what it means by "primary audience," in subsection (b), "website and online service operators could argue that primary means more than 50%. And if the Commission were to accept this claim, all but the youngest skewing children's websites would no longer be considered child-directed."

The comScore data supports this concern. The Rudd Center Report shows that only 3 of the 57 websites examined had an audience share of greater than 50% children aged 2-11 and only 14 had an audience share of greater than 50% children aged 2-14. This audience share data suggests that website operators could argue their websites do not have children as a *primary* audience.

Similarly, we are concerned that operators of child-directed websites could argue that their websites do not attract a *"disproportionately large percentage of children under age 13 as compared to the percentage of such children in the general population."* The Rudd Center found that children 2-11 make up 10% of the total internet audience and children 2-14 make up 14.9%. The FTC does not define what it means by disproportionately large percentage. Assuming that a "disproportionately large share" might mean twice the percentage of an age group of internet users, some of the children's websites identified by comScore would fall below that threshold. Indeed, 5 of the 57 websites had less than a 20% share of children 2-11 and 6 had less than 29.8 share of children 2-14.

These websites are clearly directed at children. For example, Disney Fairies, with an audience share of 19.7% ages 2-11 and 26.6% ages 2-14, has games and animated videos featuring Tinkerbell. It urges children to "create a fairy and fly." The website also provides a separate page for parents, indicating that the rest of the website is aimed at children. Similarly, National Geographic Kids, with an audience share of 17% ages 2-11 and 22.3% ages 2-14, is directed at children as indicated by the name of the website, as well as the child-oriented geography games and puzzles featured on the website. Likewise, Yahoo! US Kids is clearly intended for children even though its reported audience share is 16.4% ages 2-11 and 23.8% ages 2-14. It features popular cartoon characters such as the Teenage Mutant Ninja Turtles, Sesame Street characters, and Lego games. Thus, adoption of the proposed definition of child directed websites would have the unintended effect of exempting many websites that are in fact child-directed.

Defining child-directed websites: Implications for limits on food advertising to children through the Children's Food and Beverage Advertising Initiative (CFBAI)

October 17, 2012

Companies that participate in the CFBAI have pledged that they will only advertise healthier dietary choices on child-directed third-party websites.[1] The majority of companies define child-directed websites as those where 30% or 35% or more of total visitors are children under age 12.[2] This report examines children's entertainment websites to determine whether they would qualify as child-directed media according to CFBAI participants.

Methods

To identify child-directed third-party websites that would be covered by food companies' CFBAI pledges, we analyzed exposure data for all websites classified by comScore as "Entertainment - Kids" websites. comScore designates a website as kids' entertainment if the content includes activities and online games for kids, based on examination of the sites by their dictionary team. We used the comScore Media Metrix Key Measures Report to obtain the number of average monthly unique visitors to these websites during the first two quarters of 2012 for the following age groups: 2-11 years, 12-14 years, 2-17 years, and 2+ years.[3] To obtain the number of unique visitors in the 2-14 years age group, we added the numbers of unique visitors among youth 2-11 and 12-14 years. The report also provided unique visitors to all kids' entertainment websites and the total internet during the same time periods.

We analyzed all websites on the comScore Entertainment – Kids report that had at least 100,000 unique child visitors during either the first or second quarter of 2012. In most cases, we examined data for specific URLs (e.g., Nick.com, CartoonNetwork.com). However, some websites had sub-sites with a large number of child visitors, but the full website also contained a wide variety of content not targeted to children. In those cases, we examined the children's sub-sites instead of the full websites (e.g. Disney Entertainment instead of Disney.com, National Geographic Kids).

To compute monthly unique visitors for the six-month period (Jan-Jun 2012), we averaged the number of monthly unique visitors for both quarters of 2012 for each website. Average percent reach of all children for each site and all kids' entertainment sites was calculated by dividing the monthly unique visitors to the site by the monthly visitors to the internet for the same age group. Finally, we calculated child-audience share for each website, all kids' entertainment sites, and the internet by dividing the number of unique child visitors (for each age group examined) by all unique visitors to the sites. **Table 1** provides definitions of the key measures examined.

Table 1: Key measures

Monthly unique child visitors	Average number of unique individuals who visited each website per month during the period of January-June 2012 for three age groups: 2-11 years, 2-14 years, and 2-17 years
Percent reach	Average percent of children within each age group who visited the website each month
Child-audience share	Average percent of all unique visitors to a particular website who were from a specific age group

Results

A total of 73 different websites with at least 100,000 monthly unique child visitors (ages 2-11) were included on the comScore Entertainment - Kids' list during the first two quarters of 2012 (including sub-sites within Disney Entertainment). **Table 2** provides audience data for kids' entertainment websites with at least 200,000 average monthly visitors (2-14 years) during January-June 2012.

Five websites averaged more than 3 million unique child visitors per month in the first two quarters of 2012, and four of those sites were affiliated with children's media companies. On average, 4.8 million unique 2- to 11-year-olds visited Disney Entertainment websites every month during this period (22% of all 2- to 11-year-olds), and 3.9 million (18% of children) visited Nick.com and CartoonNetwork.com. CoolMath-Games.com and PBSKids.org averaged 3.6 and 3.1 million unique child visitors per month (14%-16% reach). Eleven additional URLs and three sub-sites of Disney Entertainment averaged 1 million or more unique child visitors per month (5%+ reach).

On average, 30% of unique visitors to kids' entertainment websites during January-June 2012 were children ages 2 to 11, compared with 10% of visitors to the internet in total. Child-audience share among the sites with 1 million or more unique child visitors per month ranged from 29% (FunBrain.com) to 46% (Roblox.com). The website with the highest child-audience share was BobTheBuilder.com, with 70% of total visitors between the ages of 2 and 11; while Rhymezone.com had the smallest child-audience share, at 10%. Twenty-two of the websites we examined (30%) had a child-audience share less than 30% and would not qualify as "child-directed" according to any of the CFBAI participating companies. Sites that do not qualify include MiniClip.com (2.0 million child visitors; 28% child-audience share), FunBrain.com (1.4 million child visitors; 29% child-audience share), and Disney Junior (0.6 million child visitors; 25% child-audience share).

If the definition of child-directed media was expanded to include 12- to 14-year-old visitors, all but 10 of the kids' entertainment websites we examined would be included. Just five sites with 200,000 or more unique 2- to 14-year-old visitors per month had a child-audience share less than 30%, including Disney Junior, Hasbro.com, TeenNick.com (390,000 unique 2- to 14-year-old visitors; 27% child-audience share), Disney Fairies (240,000 unique 2- to 14-year-old visitors; 27% child-audience share), and National Geographic Kids (238,000 unique 2- to 14-year-old visitors; 22% child-audience share). On average, 47% of unique visitors to kids' entertainment sites were under 18 years old, and the majority of visitors to approximately two-thirds of the sites were under 18.

Conclusions

Current definitions of child-directed websites used by CFBAI participating companies do not include many of the websites with child-targeted games and activities that are visited by large numbers of children. Companies must expand their pledges to advertise only healthier dietary choices on websites that are also visited by large numbers of children, as well as those with features designed to appeal to children.

Table 2: Average monthly exposure data for January to March 2012 and April to June 2012

	Ages 2-11			Ages 2-14			Ages 2-17		
	Total monthly unique visitors (000)	% reach	Audience share	Total monthly unique visitors (000)	% reach	Audience share	Total monthly unique visitors (000)	% reach	Audience share
Total internet	22,099	100.0	10.0	33,034	100.0	14.9	44,584	100.0	20.1
Entertainment - kids	20,180	91.3	30.0	26,766	81.0	39.8	31,630	70.9	47.1
Individual websites:									
Disney Entertainment	4,818	21.8	31.6	6,017	18.2	39.4	7,226	16.2	47.4
Nick.com	3,937	17.8	39.4	4,661	14.1	46.6	5,558	12.5	55.6
CartoonNetwork.com	3,936	17.8	45.0	4,554	13.8	52.1	5,250	11.8	60.0
Coolmath-games.com	3,608	16.3	39.4	4,391	13.3	47.9	5,216	11.7	56.9
PBSKids.org	3,115	14.1	41.5	3,464	10.5	46.2	3,857	8.7	51.4
Roblox.com	2,234	10.1	45.6	2,689	8.1	54.8	3,050	6.8	62.2
Poptropica.com	2,165	9.8	40.8	2,645	8.0	49.9	3,040	6.8	57.3
Miniclip.com	1,952	8.8	27.6	2,916	8.8	37.6	3,444	7.7	48.8
Disney Channel*	1,871	8.5	34.3	2,263	6.8	41.5	2,747	6.2	50.4
ClubPenguin.com	1,687	7.6	38.0	2,036	6.2	45.9	2,413	5.4	54.4
GirlsGoGames.com	1,559	7.1	31.7	1,965	5.9	39.9	2,488	5.6	50.6
Disney Games*	1,448	6.6	41.9	1,679	5.1	48.6	1,966	4.4	56.9
FunBrain.com	1,386	6.3	29.2	1,702	5.2	35.7	2,034	4.6	42.6
Wizard101.com	1,254	5.7	29.9	1,626	4.9	38.7	1,995	4.5	47.5
Starfall.com	1,136	5.1	44.8	1,276	3.9	50.5	1,402	3.1	55.5
Disney XD*	1,099	5.0	44.5	1,286	3.9	52.1	1,481	3.3	60.0
AGame.com	1,089	4.9	30.8	1,403	4.2	39.7	1,768	4.0	50.1
Barbie.com	1,059	4.8	48.4	1,220	3.7	55.7	1,385	3.1	63.2
MonkeyQuest.com	1,055	4.8	41.2	1,262	3.8	49.0	1,479	3.3	57.3
Webkinz.com	744	3.4	39.4	933	2.8	49.4	1,090	2.4	57.7
Disney Junior*	621	2.8	24.6	731	2.2	29.0	862	1.9	34.2
Mattel.com	620	2.8	47.5	701	2.1	53.7	798	1.8	61.1
Fantage.com	604	2.7	31.0	832	2.5	42.7	1,042	2.3	53.5
iCarly.com	468	2.1	43.0	556	1.7	51.2	667	1.5	61.5
NBAHoopTroop.com	464	2.1	52.1	538	1.6	61.1	611	1.4	69.7
TheSlap.com	462	2.1	44.1	569	1.7	54.2	697	1.6	66.4
Marvel.com	408	1.9	22.2	609	1.8	32.2	740	1.7	38.7
MonsterHigh.com	398	1.8	42.1	459	1.4	48.5	548	1.2	57.8
SproutOnline.com	345	1.6	45.4	407	1.2	53.6	438	1.0	57.7
Disney Create*	325	1.5	29.9	404	1.2	37.2	484	1.1	44.5
PBSKidsPlay.org	323	1.5	53.8	345	1.0	57.6	380	0.9	63.6
Disney Videos*	307	1.4	28.7	384	1.2	36.2	467	1.0	44.2
Hasbro.com	305	1.4	22.1	389	1.2	28.2	479	1.1	34.8
SesameStreet.org	278	1.3	38.2	344	1.0	47.4	372	0.8	51.2
Jumpstart.com	277	1.3	33.2	357	1.1	43.0	407	0.9	49.0
ChuckECheese.com	277	1.3	22.4	378	1.1	30.6	439	1.0	35.7

Site	2-11 (000)	%	child share	6-11 (000)	%	child share	2-17 (000)	%	child share
Neopets.com	274	1.2	26.0	391	1.2	37.0	506	1.1	47.9
Hubworld.com	258	1.2	38.5	322	1.0	48.1	375	0.8	56.1
OurWorld.com	257	1.2	20.8	505	1.5	40.9	662	1.5	53.7
PetPetPark.com	252	1.1	48.6	299	0.9	53.7	351	0.8	67.4
AmericanGirl.com	246	1.1	32.1	287	0.9	37.6	329	0.7	43.1
PollyPocket.com	238	1.1	48.8	276	0.8	56.6	322	0.7	66.1
AnimalJam.com	236	1.1	38.1	299	0.9	48.3	347	0.8	56.1
WoozWorld.com	231	1.1	27.1	413	1.3	49.8	489	1.1	57.6
Disney's Toontown Online*	228	1.0	38.7	281	0.8	47.5	337	0.8	57.0
HotWheels.com	217	1.0	56.4	240	0.7	62.3	258	0.6	67.1
Frootloops.com	204	0.9	43.4	232	0.7	49.5	273	0.6	58.2
KidsWB.com	201	0.9	46.5	249	0.8	57.5	274	0.6	63.5
Disney Fairies*	177	0.8	19.7	240	0.7	26.6	314	0.7	34.6
TeenNick.com	191	0.9	12.0	390	1.2	24.6	631	1.4	39.7
GanzWorld.com	180	0.8	39.6	230	0.7	50.4	269	0.6	58.9
National Geographic Kids	180	0.8	17.0	238	0.7	22.3	298	0.7	27.9
Yahoo! U.S. Kids	155	0.7	16.4	224	0.7	23.8	279	0.6	29.6
PencilKids.com	152	0.7	28.4	205	0.6	38.3	273	0.6	50.9
AOL KOL (Kids)	142	0.6	21.1	226	0.7	33.6	280	0.6	41.8
Kidzbop.com	135	0.6	29.4	205	0.6	44.6	256	0.6	55.1
RhymeZone.com	92	0.4	9.5	324	1.0	33.6	436	1.0	45.3

*Sub-site of Disney Entertainment
Shading indicates sites with a child-audience share less than 30%

Source: comScore Media Metrix Key Measures Report (January –June 2012)

References

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[2] Children's Food and Beverage Advertising Initiative (2012, March). Summary of participants' definitions of advertising primarily directed to children under 12 and policies on not directing advertising to children under 6. Available at www.bbb.org/us/storage/16/documents/cfbai/CFBAI%20Audience%20Definitions%20March%202012.pdf

[3] comScore (2012). Media Metrix Suite. http://www.comscore.com/Products_Services/Product_Index/Media_Metrix_Suite