

**Commercial Alert  
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June 22, 1999

Robert Pitofsky  
Chairman  
Federal Trade Commission  
600 Pennsylvania Ave.  
Washington, DC 20580

**RE: Marketing of Violent Entertainment to Children**

Dear Chairman Pitofsky:

On June 1, President Clinton instructed the Federal Trade Commission (FTC) and the Department of Justice to study the advertising and marketing of violent entertainment products to children. In his speech, the President noted that "Every parent knows what response a commercial for sugar cereal or the latest Star Wars toy will get from their children. People advertise because it works. They want that product and, one way or the other, they're determined to get it." Advertising, the President said, has "the power to egg children on and lure them in."

The President is right -- advertisers exercise a great deal of influence over our children. That is why this study is very important.

We all know what the advertisers say in public-- that they are merely providing "information" to children, that parents make the real decisions, and so forth and so on. It is crucial that the FTC gets at the truth behind the marketing of violence to children. It must expose how entertainment industry operatives talk to one another when they target the nation's children, not just how they speak to the public when the cameras are running. This will require digging.

The FTC will have to use its subpoena power aggressively to compile internal corporate memoranda, marketing studies and other evidence of how television, motion picture, video game, music, and in-school advertising companies market violent entertainment products to American children. Parents are entitled to know about the designs that corporate marketing departments have on their children. They are entitled to know about the strategies and seductions these corporations deploy. They need to know these things to protect their children. And this information could form the basis for further legislative or regulatory action on the marketing of violent entertainment products to children.

It is especially important that the FTC investigate corporate strategies and influences such as these:

Channel One and its advertisers. Channel One is a marketing company that uses the schools to deliver advertising to captive audiences of children. It promotes itself to advertisers as the “news show that delivers more tween viewers than any other programming that you can buy.” Currently, the MTV-like program is shown to about eight million middle, junior high and high school students in about 12,000 schools. In these schools, students spend the equivalent of about one class week each year watching Channel One, including one full school day just watching ads. According to Jim Metrock of Obligation Inc., Channel One has broadcast commercials for violent movies and television including *The Mummy*, Steven King’s *The Shining*, *Buffy the Vampire Slayer*, and *The Quest*. This list is incomplete because Channel One refuses to make its programming available to the public. Channel One has repeatedly played Blockbuster Video ad which showed a child collapsing after five days of non-stop video game playing. Did that advertisement contribute to the use of violent video games by children? The FTC should require Channel One to disclose all entertainment products that it has displayed, featured, played, or advertised to its vast audience of captive schoolchildren. Parents ought to know what entertainment products are advertised to their children while they are in school. Enclosed is testimony on Channel One from a hearing before the Senate Committee on Health, Education, Labor and Pensions.

Which advertisers support violent television programming. The free market is based upon the principle of choice. Buyers are supposed to be able to make informed choices about which companies and products they want to support. The market doesn’t work today in regards to the marketing of violence to children because parents don’t have the information they need.

We urge the FTC to fill this gap so that the market can work. The FTC could tally the average number of televised violent acts by show and by sponsor, and publish statistics regarding which shows are the most violent, and which companies sponsor the most violent TV shows. This would help parents express their informed preferences in the marketplace in regards to the networks and sponsors for their violent programming. Parents could learn of the most violence-associated brands of peanut butter, soap, toothpaste, hamburgers, soda, chewing gum, etc., and could make their purchasing decisions accordingly.

The use of psychological techniques in marketing violent entertainment products to children. Advertisers employ the tools of psychology to design the ad campaigns with which they barrage impressionable children. The FTC should investigate precisely how they do this -- and how they enlist children in the process. Parents need to know the strategies and wiles by which entertainment corporations are targeting their children -- and they need to know who is responsible. What studies have entertainment companies done to enable them to tap into and manipulate the psyches of children? Such information could be of great use to families that wish to give their children tools to defend themselves against these corporate marketing strategies. Attached is a copy of our book *Children First: A Parent’s Guide to Fighting Corporate Predators*, which discusses this subject in some detail.

Heightening and preferential selection of violent content. Do entertainment companies purposefully heighten or modulate the violent content of media to increase the number of children who watch or purchase their product? If so, how? Five years ago, *The Wall Street*

*Journal* reported on the story of gangster rapper Lichelle “Boss” Laws: “It wasn’t until Ms. Laws acquired ‘the flavor’ -- entertainment industry jargon describing the style found among the youth from America’s mean streets -- that she was able to land a recording contract. ‘I tried the straight-up nice girl’ approach, she says, and it ‘didn’t work.’ So she raps songs such as ‘A Blind Date With Boss,’ in which she acts out the seduction and murder of her date, a macho misogynist.”

Advertiser influence on violent television programming. To what extent have advertisers encouraged violent television programming directly or indirectly -- through steering their support to television shows with substantial violent content, or, for example, by complaining when the programming does not appeal to the lowest common denominators among young viewers.

Furthermore, we urge the FTC to study the market for violent entertainment products and evaluate evidence that these violent products are a classic case of market failure, in that the consumption of violent entertainment products may create social costs that are not comprehended by the market or the price mechanism. Such costs could include, for example, heightened levels of crime, violence, aggression, and desensitization to violence. In his book *Channeling Violence: The Economic Market for Violent Television Programming*, James T. Hamilton argues that “television violence is fundamentally a problem of pollution” -- that violent television programs cause externalities (e.g., harm to children) which are not taken into account by market forces. The FTC should expand this analysis to include other types of entertainment products, including movies, music and video games.

Hamilton writes that “If television violence is akin to pollution, then policies designed to deal with the negative externalities generated by pollution are an obvious place to start in considering how to deal with televised violence.” The FTC should consider and evaluate such policies as a part of its efforts to “look at whether more should be done” by the FTC regarding the marketing of violent entertainment products to children.

The FTC should review the European experience related to advertising to children. Some European nations restrict advertising to children. For example, Sweden and Norway prohibit television advertising directly targeting children below 12 years of age. Of course, in the United States, children have no such protections. We also attach a list of experts on the subjects of marketing to children and media violence whom the FTC ought to interview for its study.

Congress has granted broad subpoena powers to the FTC to investigate corporate conduct. We hope that the FTC will use its powers in the service of parents and families, to uncover how the entertainment industry sells its violent entertainment products to children.

Sincerely,

Gary Ruskin  
Director

Ralph Nader

## **Suggested Contacts**

Axel Edling, Swedish Consumer Ombudsman

Diane Levin, Professor of Education, Wheelock College

Kathryn Montgomery, President, Center for Media Education

Lt. Col. Dave Grossman, Professor of Military Science, Arkansas State University

Peggy Charren, Founder, Action for Children's Television

Sissela Bok, Distinguished Fellow, Harvard University, Center for Population and Development Studies