



THE CHAIRMAN

FEDERAL TRADE COMMISSION

WASHINGTON, D.C. 20580

September 29, 2009

Susan Linn, ED  
Campaign for a Commercial-Free Childhood  
c/o Judge Baker Children's Center  
53 Parker Hill Avenue  
Boston, MA 02120-3225

Dear Dr. Linn:

Thank you for taking the time to meet with me this summer and for your June 24, 2009 letter documenting extensive advertising of violent PG-13 movies on children's television networks and in other media popular with children.

As you have noted, the Federal Trade Commission has repeatedly expressed its concern about the marketing of violent PG-13 films to children, beginning with its first report on Marketing Violent Entertainment to Children in 2000.<sup>1</sup> The Commission has made it clear that it views the marketing of these films directly to young children as an "end run around the parental review role underlying the ratings."<sup>2</sup> Despite urging from the Commission staff,<sup>3</sup> neither the Motion Picture Association of America ("MPAA") nor the individual movie studios have taken adequate steps to ensure that violent PG-13 movies are not marketed in a manner inconsistent with the rating.

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<sup>1</sup> Marketing Violent Entertainment to Children: A Review of Self-Regulation and Industry Practices in the Motion Picture, Music Recording & Electronic Game Industries (Sept. 2000) at 13, *available at* [www.ftc.gov/reports/violence/vioreport.pdf](http://www.ftc.gov/reports/violence/vioreport.pdf)

<sup>2</sup> 2000 Report at 54.

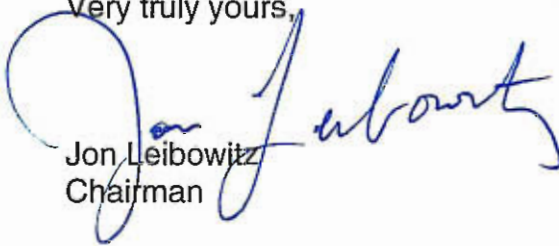
<sup>3</sup> See January 8, 2008 letter from Mary Engle, Associate Director, Division of Advertising Practices, Federal Trade Commission, to Alvin Poussaint, Campaign for a Commercial-Free Childhood, *available at* <http://www.ftc.gov/os/closings/staff/080108ccfc.pdf>. The letter called on the MPAA and the movie industry to develop a more explicit policy, incorporating objective criteria, to ensure that PG-13 movies are marketed in a manner consistent with the rating. Specifically, the staff suggested that MPAA issue guidelines restricting ad placement in media and other venues most popular with younger children.

Susan Linn, ED – Page 2

The FTC continues to monitor the entertainment industry's self-regulatory efforts and to make recommendations for stronger measures to limit the marketing of violent entertainment to children. The staff is currently working on its sixth follow-up report on this issue, which I expect to be released by the end of this year. As part of that report, the staff has analyzed the marketing plans for several films rated PG-13 for violent content. The staff is also assessing the impact of the MPAA's referral agreement with the Children's Advertising Review Unit ("CARU"). We will give careful consideration to the information you provided on the MPAA/CARU agreement and to your documentation of recent marketing of particular PG-13 movies to children, both directly and through promotional tie-ins with toys and children's food products.

Thank you for the detailed information that your letter provides and for coming in to discuss this important issue.

Very truly yours,



Jon Leibowitz  
Chairman