October 20, 2008

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: In the Matter of Sponsorship Identification Rules and Embedded Advertising MB Docket No. 08-90

Dear Chairman Martin,

Shaping Youth writes in support of the comments of Campaign for a Commercial-Free Childhood (CCFC) with regard to protecting children from the increasing use of embedded advertising[1] in all forms.

While I realize this is not the forum to discuss specific platforms, since we're primarily addressing broadcast, cable and satellite, I'd like to seed the concept of stringent guidelines for digital infiltration of commercial product placement as well. Broadcast TV has had a direct impact on the 'media mind and body logs' we use to track intake and consumption in our own Shaping Youth enrichment sessions with kids. We've seen a direct correlation between what's being 'positioned' as cool in shows and what kids begin to covet. (this goes right down to plotlines with Starbucks cups and Coke/Idol blatant shilling)

We have also seen firsthand brandwashing that occurs in virtual worlds and digital technology, and as a media and marketing industry analyst/professional writer by trade, I'll add that this is a particularly disconcerting arena. The level of 'engagement' and interactivity is enabling marketers to solidify brand preference via product placement at ever younger ages, far too early for most to discern the cognitive persuasive tactics used upon them.

Whether it's placing McDonalds cups in the news team anchor's hands to launch their café product line, or wearable items referred to by name in scripted kids' shows, we urge you to set age limits pronto, extract embedded commercialism, and end the product placement practice targeting children directly. We specialize in counter-marketing

[1] Comments of Campaign for A Commercial-Free Childhood, filed MB Docket 08-90 (Sept. 22, 2008).

unhealthy messages to kids, and I must say, it's been difficult to keep up with the plethora of products being hawked in ever-ingenious subtle new ways to embed the brand and blur the boundaries of 'what constitutes advertising.'

Children are especially vulnerable to commercial manipulation because many are unable to distinguish advertising from programming or to discern persuasive intent. Embedded advertising exacerbates these cognitive vulnerabilities by disguising advertising as entertainment. Sponsorship identification and other types of disclosure are ineffective for children, who often do not understand the meaning of such disclaimers. Consequently, we encourage the FCC to adopt additional safeguards to protect children from the harmful effects of embedded advertising.

In particular, Shaping Youth supports an explicit ban on the use of embedded advertising in children's programming. Such a prohibition is consistent with the goals of the Children's Television Act of 1990, as well as longstanding FCC policy protecting children from commercial exploitation.

As a media analyst, and a writer/producer IN the advertising industry I can attest that children are not adequately safeguarded from product placement, as the seamlessness and 'scavenger hunt' approach we use to test what kids find is nothing short of 'stealth' until kids are purposely informed in a full media literacy game curricula we've been testing with them. Further, primetime programming should be free of objectionable or commercially-exploitive content, and it is far, far from it. Consequently, Shaping Youth urges the FCC to explore ways to protect children from unfair and misleading advertising practices during those hours of primetime broadcast programming when children are likely to be in the audience, and to get a head start on considering the exploitive practices transpiring in the virtual playgrounds.

The pervasiveness of product placement is akin to corporate pedophilia at this juncture as business interests are literally stalking, profiling, and harassing young children. It needs to stop. It must stop. As we say at Shaping Youth, the price we pay to mine their childhood will ultimately cost us all.

Respectfully submitted,

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[1] Comments of Campaign for A Commercial-Free Childhood, filed MB Docket 08-90 (Sept. 22, 2008).