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CAMPAIGN FOR A COMMERCIAL-FREE CHILDHOOD

OBLIGATION, INC

June 29, 2009

Michael J. Copps, Acting Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Commercial Programming Services Targeted to Children Onboard School Buses
MB Docket 09-68

Dear Acting Chairman Copps:

The Campaign for a Commercial-Free Childhood ("CCFC") and Obligation, Inc. respectfully submit this letter to alert the Commission to the broad coalition of advocacy groups and individuals who are concerned about commercial programming services targeted to children onboard school buses.

Recently, the FCC asked for comment about whether such broadcasts were in the public interest.[1] CCFC, Obligation, Inc., and the undersigned believe strongly that services which make listening to student-targeted advertising a compulsory part of the school day for children who ride school buses are not in the public interest. Our concerns include:

- Commercial broadcasting targeted to students on a school bus exploits a captive audience unable to turn off programming or advertising. Given that marketing is a factor in many of the key problems facing children today: childhood obesity,[2] discontent about body image[3] and eating disorders,[4] sexualization,[5] youth violence,[6] and family stress,[7] no child should be forced to listen to advertising while riding a public school bus.

[1] *Commercial Programming Services Targeted to Children Onboard School Buses*, Public Notice, MB Docket 09-68 (rel. May 20, 2009)
[2] Institute of Medicine of the National Academies. (2006). *Food Marketing to Children and Youth: Threat or Opportunity?*, Washington, DC: The National Academies Press. p. 2.
[3] Hargreaves, D. & Tiggemann, M. (2002). The Effect of Television Commercials on Mood and Body Dissatisfaction: The Role of Appearance-Schema Activation. *Journal of Social and Clinical Psychology*, 21(3): 287-308.
[4] Becker, A.E. et al. (2002). Eating Behaviors and Attitudes Following Prolonged Exposure to Television Among Ethnic Fijian Adolescent Girls. *British Journal of Psychiatry*, 180, 509-514.
[5] American Psychological Association, Task Force on the Sexualization of Girls. (2007). *Report of the APA Task Force on the Sexualization of Girls*. Washington, DC: American Psychological Association. Retrieved March 25, 2008, from http://www.apa.org/pi/wpo/sexualizationrep.pdf, p. 3.
[6] American Academy of Pediatrics (2000, July 26). Joint Statement on the Impact of Entertainment Violence on Children. *Congressional Public Health Summit*. Retrieved February 9, 2008 from http://www.aap.org/advocacy/releases/jstmtevc.htm.

- Advertising on school buses also undermines parental authority. Parents who monitor their children's media use and exposure to advertising are unable to shield their children from content played while they are riding a bus to and from school.
- Advertising on school buses exploits the powerful and unique role that schools play in children's lives. Everything advertised on a broadcast designed especially for school buses comes with a school's implicit endorsement, even though the products advertised may undermine children's wellbeing or education.

In addition, we have grave concerns about BusRadio, Inc., currently the only company that produces commercial broadcasts on school buses and which has publicly stated its plans to "take targeted student marketing to the next level."[8] Concerns about BusRadio include:

- Despite pitching itself to school districts as an age-appropriate alternative to FM radio, BusRadio routinely plays music from albums with parental warnings and edited versions of songs that introduce young children to inappropriate music and artists.
- BusRadio regularly violates the FCC's and Children's Advertising Review Unit's rules that require clear separation of programming and advertising, including the longstanding prohibition on host-selling. By exploiting the relationship between its on-air personalities and its young listeners, BusRadio is able to produce advertising that is even more powerful than traditional commercials for children.
- BusRadio uses its broadcasts to drive students to its website, where children are exposed to more advertising and age-inappropriate media.

Given these concerns about both the business model of student-targeted commercial broadcasts on school buses and the practices of BusRadio, we urge the Commission to report to Congress that commercial programming services targeted to children onboard school buses are not in the public interest.

Respectfully Submitted,

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[7] Buijzen, M. & Valkenburg, P.M. (2003). The Effects of Television Advertising on Materialism, Parent–Child Conflict, and Unhappiness: A Review of Research. *Applied Developmental Psychology*, 24, 437–456.
[8] Mayer, C. (2006, June 4). The Next Niche: School Bus Ads. *The Washington Post*. Retrieved June 7, 2009 from http://www.washingtonpost.com/wp-dyn/content/article/2006/06/03/AR2006060300150.html.

Attachment A

We support the comments of the Campaign for a Commercial-Free Childhood and Obligation, Inc and urge the FCC to report to Congress that commercial programming services targeted to children onboard school buses are not in the public interest.

Organizations

Action Coalition for Media Education (ACME)
www.acmecoalition.org

Concerned Educators Allied for a Safe Environment (CEASE)
www.peaceeducators.org

Center for a New American Dream
www.newdream.org

Corporate Accountability International
www.stopcorporateabuse.org

Healthy Media Choices
www.healthymediachoices.org

Industry Ears
www.industryears.org

Kids Can Make a Difference
www.kidscanmakeadifference.org

National Association of Mothers' Centers
www.motherscenter.org

National Institute on Media and the Family
www.mediafamily.org

Parents for Ethical Marketing
www.parentsforethicalmarketing.org

Parents Television Council
www.parentstv.org

Shaping Youth
www.shapingyouth.org

Teachers Resisting Unhealthy Children's Entertainment (TRUCE)
www.truceteachers.org

United Church of Christ, The Office of Communication, Inc.
www.ucc.org/ocinc

Individuals

Enola Aird*, JD, Founder, Mothers for a Human Future**
Nancy Carlsson-Paige*, EdD, Professor, Lesley University**; Author, *Taking Back Childhood: Helping Your Kids Thrive in a Fast-Paced, Media-Saturated, Violence-Filled World*
Nancy Gruver, Founder and CEO, New Moon Girl Media**
Rene Hobbes, EdD, Professor, Temple University**, School of Communications and Theater
Carden Johnston, MD, FAAP, FRCP, Past President, American Academy of Pediatrics**
Allen Kanner*, PhD, Co-editor, *Psychology and Consumer Culture: The Struggle for a Good Life in a Materialistic World*
Tim Kasser*, PhD, Professor, Knox College**; Author, *The High Price of Materialism*
Joe Kelly*, TheDadMan.com; Author, *Dads & Daughters: How to Inspire, Understand, and Support Your Daughter*
Diane Levin*, PhD, Professor, Wheelock College**; Author, *So Sexy So Soon: The New Sexualized Childhood and How Parents Can Protect Their Kids*
Robert W. McChesney, PhD, Professor, University of Illinois**; Author, *The Political Economy of Media*
Alex Molnar*, Director, Center for Education Research Unit; Professor, Arizona State University**; Author, *School Commercialism: From Democratic Ideal to Market Commodity*

* CCFC Steering Committee member
** Institutional affiliations are given for identification purposes only