

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

**In the Matter of** )  
 ) MB Docket No. 09-194  
**Empowering Parents and Protecting Children** )  
**in an Evolving Media Landscape** )

**COMMENTS OF ELIZABETH JANSMA**

I am pursuing a joint degree at Stanford Law School and Stanford University School of Education and am writing in response to the Commission’s request for comment in the above-mentioned proceeding. My comments focus specifically on the risks to children of advertisements in electronic media and the need for a robust media literacy program in public schools.

**I. The proliferation of advertising is harmful to children.**

Corporations spend over \$15 billion annually marketing to children—a sum that has surged in recent years as advances in digital technology make it easier to access the eyes, ears, and pocketbooks of children and their parents.<sup>1</sup> Most teenagers do not analyze advertisements’ underlying meaning or profit motive, and studies show that children under age eight are unable to critically comprehend advertising content.<sup>2</sup> Youth are particularly vulnerable to hard-to-detect advertising that is seamlessly embedded in new media technologies such as mobile devices and social networking sites.<sup>3</sup> Because children can personalize and interact with new technologies in myriad ways, they are even more likely to rely on embedded advertising as a credible source of information.

Corporate advertising is harmful to children’s physical and psychological well-being. Junk food and soft drink ads contribute to childhood obesity, a national epidemic affecting between 16 and 33 percent of children and adolescents. Advertising can also foster a skewed perception of the beauty ideal and negative body image that leads to unhealthy habits and eating disorders. Advertisers seeking to appeal to children’s emotions through violent or sexualized messaging encourage aggressive and irresponsible sexual behavior. Moreover, the onslaught of child-targeted

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<sup>1</sup> Christine Lagorio, *Resources: Marketing to Kids*, CBS Evening News FYI, May 17, 2007 (writing that in 2007 companies spent \$17 billion annually marketing to children), available at <http://www.cbsnews.com/stories/2007/05/14/fyi/main2798401.shtml>.

<sup>2</sup> American Psychological Association, “Television Advertising Leads to Unhealthy Habits in Children; Says APA Task Force,” February 23, 2004, [www.apa.org/releases/childrenads.html](http://www.apa.org/releases/childrenads.html) (accessed March 8, 2006).

<sup>3</sup> Susan Linn & Courtney L. Novosat, *Calories for Sale: Food Marketing to Children in the Twenty-First Century*, 615 *Annals of the American Academy of Political and Social Science* 133, 144-6 (2008) (discussing marketers’ use of new technologies like video games, cell phones, iPods, and social networking sites for better access to children); DONALD F. ROBERTS, ULLA G. FOEHR, & VICTORIA RIDEOUT, KAISER FAMILY FOUNDATION, *GENERATION M: MEDIA IN THE LIVES OF 8-18 YEAR-OLDS* 23-33 (2005).

advertising creates pressure on youth to buy products they neither need nor can afford, thus instilling in youth a sense of hyper-materialism that is difficult to unlearn.

## **I. Schools have a unique responsibility to ban in-school advertising and promote media literacy.**

In recent years, advertising has made unprecedented inroads in public education: ads cover school buses, line cafeteria and classroom walls, pop up on computers, and are embedded in educational materials. School districts facing inflated costs and shrinking budgets are particularly vulnerable to the rising tide of in-school advertising, since the need for additional funding tends to overshadow ads' deleterious effects on children.<sup>i</sup> Most advertising is antithetical to the educative purpose of schools and places a captive audience of children at risk of the physical and psychological harms discussed above. When schools become the purveyors of corporate advertising, they affix their symbolic stamp of approval on destructive messaging.<sup>ii</sup> As such, educators have a unique responsibility to sharply restrict in-school advertising.

In addition to restricting in-school advertising, schools should play a central role in sharpening children's media literacy skills. Federal efforts to promote media literacy in the home are complicated by privacy and First Amendment concerns, together with the inherent difficulty of tailoring monitoring strategies to individual households. By contrast, schools present a neutral environment that is particularly amenable to media literacy programs. In partnership with the Department of Education and a plethora of media-oriented organizations, the FCC could develop a set of best practices in media literacy curricula for implementation at the school, district, or state level. To ensure that all children have access to such programs, the Department of Education could provide incentives to states to incorporate content standards tied to media literacy. Children who acquire media literacy skills in school could then draw on these skills in other environments and share their knowledge with family and peers.

## **II. Conclusion.**

The intimate nature of today's media technology renders useless traditional means of filtering and blocking harmful content, and a protectionist approach does little to enhance children's capacity to cope with the harmful messages that inevitably find their way into the latest technological device. Instead, the FCC should entrust educators with the responsibility of helping students to critically analyze media content wherever, and whenever, it may arise.

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<sup>i</sup> CONSUMER UNION EDUCATION SERVICES, CAPTIVE KIDS: A REPORT ON COMMERCIAL PRESSURES ON KIDS AT SCHOOL (1995) (noting that contributing factors to school commercialism are that "many of the instructional materials schools want and need are expensive and prices continue to rise" and "many schools can't afford the instructional materials they want and need").

<sup>ii</sup> BRIAN A. WILCOX ET AL., AMERICAN PSYCHOLOGICAL ASSOCIATION, REPORT OF THE APA TASK FORCE ON ADVERTISING AND CHILDREN 2 (2004) ("[the] effects [of commercialism] might be stronger in the school context [because] whatever occurs at school might be perceived as having the implied endorsement of school officials. Psychological research shows that expertise and prestige increase the persuasive power of a message's source.").