



Campaign for a Commercial-Free Childhood

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January 17, 2008

Mr. Dan Glickman
Motion Picture Association of America
1600 Eye Street NW
Washington, DC 20006

Dear Mr. Glickman,

We are writing to urge you to adopt the Federal Trade Commission's recommendation that the Motion Picture Association of America develop explicit restrictions for the marketing of PG-13 films to young children. Without such restrictions in place, film companies are actively marketing violent PG-13 movies to preschool children.

Marketing of PG-13 Films to Young Children

The FTC's recommendation was spurred by a complaint from the Campaign for a Commercial-Free Childhood (CCFC) that *Transformers*, which was rated PG-13 for "intense sequences of sci-fi action violence, brief sexual humor, and language," was marketed extensively to preschool children. A review by CCFC found advertisements for *Transformers* on children's television programming rated appropriate for kids as young as two; more than one hundred *Transformers*' toys for children under six; and *Transformer* promotions by Kraft and Burger King clearly aimed at young children.

Transformers is not the only PG-13 film to be marketed to young children. Between May 2006 and June 2007, the Children's Advertising Review Unit (CARU) publicly cited seven instances of PG-13 movies being advertised during children's television programming.¹ In 2007, *Spiderman 3*, *Pirates of the Caribbean: At World's End*, and *The Fantastic Four: Rise of the Silver Surfer* had licensed toys for children as young as four. In 2005, the PG-13 blockbuster *Star Wars: Revenge of the Sith* featured toys for young children as well as a Burger King toy giveaway and several other food promotions that clearly appealed to preschool children,² despite George Lucas' public statements that the film's violence and dark themes were inappropriate for children under six.³

It is clear that PG-13 films – including movies with significant violent content – are consistently marketed in a manner that contradicts the "Parents Strongly Cautioned" message accompanying their PG-13 rating. It is also clear that the companies that benefit from such marketing face no consequences other than a recommendation from CARU that they refrain from advertising a particular PG-13 film on children's programming.⁴ Since CARU has no enforcement authority, and its recommendations tend to occur after a film has been released and its advertising has ended,⁵ film companies have little incentive to heed these recommendations. Currently, no regulatory body oversees whether licensed toys or restaurant movie promotions are marketed in a manner consistent with a film's rating.

Harm Caused by the Marketing of PG-13 Films to Young Children

Preschool children are less able to place violence in context. They tend to remember the most exciting and dramatic aspects of a film rather than whole stories. They have less impulse control. They are concrete thinkers who are likely to believe what they see.⁶ In addition, preschool children are more vulnerable to advertising than older children because they do not understand persuasive intent, the basis of advertising.⁷

Given the developmental differences between a preschooler and a 13-year-old, marketing PG-13 films to young children can be harmful in three ways:

1) It undermines the integrity and effectiveness of an already flawed rating system; 2) it promotes family stress; and 3) it increases the likelihood that young children will be exposed to media material and messages that may not be suitable for them, such as messages that glorify violence.

The Federal Trade Commission has identified licensed toys as a tool for promoting media programs.⁸ It is important to remember that the impact of a film on children extends beyond the film itself to the extensive and aggressive cross-marketing among its licensed toys and other products that serve to promote the film and encourage children to see it.

Harm to the Integrity and Effectiveness of the Rating System

The Motion Picture Association's PG-13 rating advises that "some material may be inappropriate for children under the age of thirteen" and features the warning: "Parents Strongly Cautioned." The term "may be inappropriate" is ambiguous because it implicitly suggests that the material also *may be appropriate* for children under thirteen. The admonition, "Parents Strongly Cautioned," is less ambiguous. According to the MPAA, "A PG-13 rating is a sterner warning [than a PG rating] by the Rating Board to parents to determine whether their children under age 13 should view the motion picture, as some material might not be suited for them."

If the purpose of the rating system is to provide information for parents to enable them to make competent, informed decisions about their children's exposure to media messages, then the MPAA's ambiguous language describing the PG-13 rating already renders it a less than useful tool. Marketing techniques such as those employed by DreamWorks to promote *Transformers* (including marketing the film to preschoolers through toys and through ads for toys) further weaken the statement "strongly cautioned" and add to the ambiguity of the phrase "may be inappropriate." Parents may make inaccurate assumptions about film content based on the marketing campaigns of those films.

For example, the sheer number of *Transformers* toys marketed to preschoolers is likely to lead parents to believe that the *Transformers* film is appropriate for young children. Since about 90% of the toys created for *Transformers* are labeled as what the toy industry calls "age appropriate" for preschool children,⁹ the toys carry the implicit message that the movie must be suitable for young children. Parents are likely to believe that the *Transformers* movie is suitable for young children and to disregard the MPAA rating because the film is based on a line of toys traditionally marketed to young children.

The toys' labeling, in combination with the fact that they were marketed on television during programs that children watch, and the fact that the commercials included clips from the movie,¹⁰ all serve to undermine the integrity and effectiveness of the PG-13 rating and its *Parents Strongly Cautioned* warning. Because the film will have a life on DVD long after its theatrical release, the rating system will continue to be undermined even after the initial blast of marketing that surrounded its release.

Scholastic, Inc., for example, is marketing a *Transformer* toy in its book club for 2nd graders, with a tagline asking if they have seen the movie.¹¹

Harm to Parents and Family Stress

By undermining the integrity and effectiveness of the MPAA rating system, the active marketing of PG-13 movies to preschool children also disserves parents and undermines parental authority. The marketing of PG-13 movies to preschool children suggests to parents that such films may be appropriate for their children even though they have a PG-13 rating. The toys promoting the movie are labeled appropriate for young children and contain no information indicating that the movie may not be appropriate for them or that parents should be “strongly cautioned” about the film. The fact that the film and the toys are marketed during television programs watched by young children adds to the likelihood that parents would expect the film to be appropriate viewing for their young children. Finally, marketing for the toys is much more prevalent than information about the film’s rating, and is, therefore, more likely to garner parents’ attention.

The marketing of PG-13 movies directly to young children harms parents in other ways as well. Companies that bypass parents and target children directly with advertising undermine parents’ efforts to limit children’s exposure to media that may be inappropriate for them. It is also likely to create family stress for parents who set limits on their young children’s access to PG-13 movies.¹² While it is easy to argue that parents should “just say no” to requests from children to view violent media, it is important to remember that marketing for PG-13 movies takes place in the midst of an avalanche of other kinds of marketing for all sorts of other potentially unsuitable products including junk food, violent videogames, and sexualized clothing.

When toys from PG-13 movies are marketed in commercials during children’s programming, and include clips from the movies, even parents who limit children’s TV viewing to appropriate programming are harmed because they have to cope with the results of children who see those ads. When PG-13 movies are marketed directly to children, even parents who refuse to let their children watch television at all are negatively affected because it is likely that their children will be subject to peer pressure to see the film from children whose parents do not set the same limits, or children who own the related toys.

Harm to Children

The marketing of PG-13 movies directly to young children can harm them in several ways. It significantly increases the likelihood that they will see a film featuring material that may be unsuitable for them. This is of particular concern because many films are rated PG-13 for violence. Myriad studies document the negative impact of violent media content on children. Even if parents set limits on children’s media consumption and take the PG-13 rating seriously, the marketing may still harm children. A review of the research on marketing to children suggests that advertising to children can increase parent/child conflict, particularly among younger children who are more susceptible to advertising, have trouble delaying gratification, are more likely than older children to make requests based on advertising, and are more likely to nag, whine and get angry when refused than older children.¹³

Recommendations

Given the harm to children and families as well as the integrity of the MPAA's own rating system, we urge the MPAA to heed the Federal Trade Commission's recommendation and adopt a comprehensive policy for the marketing of PG-13 films. Such a policy should include the following measures:

- Restrict the television advertising of PG-13 movies to programs where fifty-percent of the audience is thirteen or older or adopt a 9:00 PM watershed for the advertising of PG-13 films.
- Insist that any toys released in conjunction with a film carry an age recommendation consistent with the film's rating.
- Prohibit any restaurant tie-ins (including toy giveaways) or other promotions aimed at young children for PG-13 movies.

These measures would go a long way towards helping parents make informed choices about which films are appropriate for their children. We would welcome the opportunity to discuss this matter with you further.

Sincerely,

Action Coalition for Media Education
Alliance for Childhood
Benton Foundation
Campaign for a Commercial-Free Childhood
Center for a New American Dream
Center for SCREEN-TIME Awareness
Commercial Alert
Common Sense Media
Concerned Educators Allied for a Safe Environment (CEASE)
Dads and Daughters
Hardy Girls Healthy Women
Industry Ears
Kids Can Make a Difference
The Motherhood Project
National Institute for Media and the Family
Obligation, Inc.
Office of Communication of the United Church of Christ, Inc.
The Office of Children, Youth and Family Advocacy, Women's Division, United Methodist Church
Parents for Ethical Marketing
Parents Television Council
Teachers Resisting Unhealthy Children's Entertainment (TRUCE)

¹ Those films were *Wild Hogs*, *Stomp the Yard*, *X-Men: The Last Stand*, *Pirates of the Caribbean: Dead Man's Chest*, *Superman Returns*, *Ultimate Avengers* and *Harry Potter: Goblet of Fire*. CARU's press releases are available at <http://www.caru.org/news/index.asp>. Considering that CARU did not site *Transformers*, it is quite possible that other PG-13 movies advertised to young children during this period escaped CARU's attention.

² <http://www.commercialfreechildhood.org/pressreleases/starwarsfood.htm>.

³ Star Wars: The Last Battle. *Vanity Fair*, February 2005, p. 108.

⁴ In one instance, CARU did refer Lion's Gate Entertainment to the FTC for advertising *Employee of the Month* on children's programming. <http://www.broadcastingcable.com/article/CA6401751.html?display=Search+Results&text=Caribbean>. There is no public record that the FTC took action on this referral.

⁵ For example, CARU issued its recommendation to Sony Pictures Entertainment for the film *Stomp the Yard* on March 9, 2007. The film was released on January 12, 2007. <http://www.caru.org/news/2007/stomp.pdf>.

⁶ See Diane Levin. (2003). *Teaching Young Children in Violent times: Building a Peaceable Classroom*. Cambridge, MA: Educators for Social Responsibility.

⁷ Kunkel, D. (2001). "Children and Television Advertising," in *Handbook of Children and Media*, eds. Dorothy G. Singer and Jerome L. Singer (Thousand Oaks, CA: Sage), 375-393.

⁸ FTC Report Marketing Violent Entertainment to Children: A Review of Self-Regulation and Industry Practices in the Motion Picture, Music Recording & Electronic Game Industries. September, 2000.

⁹ <http://www.commercialfreechildhood.org/pressreleases/transformersftcletter.pdf>.

¹⁰ Ibid.

¹¹ <http://www.teacher.scholastic.com/clubs/clubpdfs/sept2007/news/lucky0907news.pdf>. Accessed October 11, 2007.

¹² Buijzen, M. & Valkenburg (2003). The effects of television advertising on materialism, parent-child conflict, and unhappiness: A review of research. *Applied Developmental Psychology*, 24, 437-456.

¹³ Ibid.