

Children's Advertising Review Unit (CARU)
Annual Conference
Marketing to Children: Privacy, Food and Digital Media
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Commissioner, Federal Trade Commission
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Thank you for that very kind introduction. I always enjoy coming here, speaking to the cognoscenti of the advertising world. When I participated in the NAD conference last fall, I was five months into my tenure as an FTC Commissioner. My oldest son had just started his senior year of high school. And now, one year later, he's one month into his freshman year in college.

As I pass by his empty bedroom in our house, I think back to all those years walking by his room when he was a kid peering in to see what he was doing. It seems like he was fully wired up, surgically attached to his computer and smartphone for years. Often while he was online playing video games, he was also chatting, tweeting, and on Facebook—and at the same time watching a football game on TV and eating some spicy Doritos crushed up in a huge bowl of Ben and Jerry's Magic Brownie ice cream. I hear from my friends with younger children that the same scene is in permanent rerun in their homes – perhaps without the crushed Doritos or the football game.

Parents today face many challenges. And while the government's role is to

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First, when Congress COPPA, it designed the Act to be flexible: to adapt to changes in technology, and to be technologically neutral. The proposed changes to the Rule make clear that COPPA applies to new media, including the mobile app space.

Second, the Commission is proposing to expand the definition of personal information covered by COPPA to include photos, videos, and audio files containing children's images or voices.

It is particularly significant that the expanded definition of personal information also addresses online behavioral advertising to children. The proposed changes will require parental notification and consent prior to the collection of persistent identifiers for purposes such as compiling data on a child's online activities, or behaviorally targeting advertising to a child.

Third, we are proposing that the COPPA rule be modified to provide more streamlined, meaningful information to parents. As we have pointed out in our draft privacy report, we think companies in all contexts, not just COPPA, should move away from notices that require a law degree to understand, and towards more simplified notice and choice about information practices.²

Within COPPA, our goal for more meaningful notices has led us to propose eliminating

The time has

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The FTC and other agencies are closely ex

mandatory information requests.¹² This was our first effort to present detailed information about how alcohol companies allocate their promotional dollars. The report also included data on compliance with the industry's advertising placement standard, which requires that at least 70 percent of the audience for advertising consist of adults 21 and older. The Commission found that more than 92 percent of radio, television and print ads disseminated by the 12 suppliers met the 70 percent standard.

Soon we will issue new mandatory information requests from alcohol companies, in order to gather updated information and issue another report.

Thank you for having me today.

¹² Fed. Trade Comm'n, *Self-Regulation in the Alcohol Industry: Report of the Federal Trade Commission* (2008) available at <http://www.ftc.gov/opa/2008/06/alcoholrpt.shtm>.