

REMARKS OF CHAIRMAN DEBORAH PLATT MAJORAS¹
OBESITY LIABILITY CONFERENCE
CHICAGO, IL
MAY 11, 2005

I. INTRODUCTION

Thank you. I am delighted to be here today so that I can share with you my vision of what the FTC can do to foster positive market responses to the obesity problem. The subject of obesity, especially among our children, pervades the news media and has become daily fodder for sitcoms and late night comedians. Just last week, Bart Simpson was sent off to “fat camp” after gorging on junk food from school vending machines. On *The Tonight Show*, Jay Leno introduced a new version of the wall chart that parents use to proudly record their child’s growth – this one included a horizontal scale to measure a child’s growing girth along with height. While we can laugh at these skits, we all recognize the gravity of the problem, especially as it relates to the health of our children.

The statistics on obesity are now well-known. The latest data from the National Center for Health Statistics estimates that over 60 million adults in the U.S. are obese, and the numbers for children are even more sobering – 9 million young people between ages 6 and 19, with the percentage of overweight children tripling since 1980.² Keeping up with the many, evolving sources of data about obesity can be difficult, but whatever the latest numbers, obesity has clearly become a top consumer health issue.

¹The views expressed herein are my own and do not necessarily represent the views of the Federal Trade Commission or of any other individual Commissioner.

²“Overweight and Obesity: Home,” Division of Nutrition and Physical Activity, Centers for Disease Control and Prevention, (April 29, 2005) <http://www.cdc.gov/nccdphp/dnpa/obesity>.

Along with the media coverage has come much finger pointing. Some blame technology for making our jobs easier and enabling us to sit at a computer all day long. Some blame developers for the suburban sprawl that makes it impossible to run errands without a car and that provides fewer sidewalks. Some blame schools for cutting physical education classes and for trying to meet tight budgets through vending machine sales. Some blame television or computer and video games for capturing our children's attention at the expense of physical activity. Some blame mothers for going to work outside the home, leaving no time to prepare nutritious meals. Some blame the increase in portion sizes. And, the very reason you are here today, some blame the fast food restaurants and the manufacturers of cereals, soft drinks, and snack foods for making products that taste too good, are too convenient and affordable, and are marketed in ways that are too appealing to our kids. We have probably all pointed a finger at someone, but we will accomplish little by trying to assign blame. The fact is, we all have work to do, and endeavoring to assign blame will only eat up precious time and energy.

II. THE FTC'S RESPONSE TO THE OBESITY EPIDEMIC

In dealing with any consumer issue of such scope and significance, the FTC uses every channel and means available within the agency and also looks outside for help from potential partners in government, industry, and consumer groups. First, we engage in law enforcement, focusing our resources on unfair, deceptive, or fraudulent practices that cause significant consumer injury. Second, we conduct consumer and business education. As the old saying goes, an ounce of prevention is worth a pound of cure, so effective consumer and business education is

particularly efficient for a small agency with a large mission like the FTC. Third, we engage in research and advocacy work to help inform us and our sister agencies in our pursuit of policies that will foster a marketplace that is both vigorous and responsive to consumer needs.

I will touch briefly on each.

A. Aggressive Law Enforcement Against Bogus Weight Loss Scams

With an estimated 70 million Americans trying to lose weight,³ it is not surprising that weight loss is big business (pardon the pun). Unfortunately, too many of the weight loss products advertised to consumers are more likely to reduce the bulk in consumers' wallets than on their waistlines. Products like "Fat Trapper" and "Exercise in a Bottle" promise fast and easy weight loss with claims that you can "eat what you want and never – ever – ever have to diet again."⁴ But wait, there's more! One marketer even promised that its product would work faster than a hunger strike! "Even if you eat nothing you won't slim down as fast," the ad promised, claiming the product would burn off "more fat than running 98 miles per week."⁵

Over the past decade, the FTC has brought over 100 cases targeting deceptive weight loss claims like these, for a variety of pills, potions, patches, and lotions. We have been successful in

³See "Overweight and Obesity: At a Glance," *available at* http://www.surgeongeneral.gov/topics/obesity/calltoaction/fact_glance.htm.

⁴These and other claims made in an infomercial for two dietary supplement products were challenged by the Commission as false and misleading. *See FTC v. Enforma Natural Prods., Inc.*, Civ. Action No. 04376JSL (CWx)(C.D. Cal. 2000)(stipulated final order).

⁵In the Commission's pending case against this marketer of the "Himalayan Diet Breakthrough" the court granted a preliminary injunction and asset freeze. *FTC v. AVS Marketing, Inc. et al.*, Civ. Action No. 04C-6915 (N.D. Ill. Nov. 19, 2004)(stipulated order).

obtaining remedies with real teeth to them, in many cases getting the courts to issue temporary restraining orders, asset freezes, strong permanent injunctive relief, and substantial money judgments. We are committed to this law enforcement effort, but even with a high rate of steady enforcement activity, bogus weight loss claims have flourished. Indeed, in a non-scientific survey we conducted in 2001, we found that almost half of the ads for weight loss products included at least one claim that was false on its face.⁶

B. Media Outreach Efforts

So, to further combat this problem, we decided to enlist the media as an ally in our campaign, because, as ridiculous as many weight loss claims sound, mainstream magazines, newspapers, and cable television stations have run these advertisements without challenge. Consumers may be skeptical about a pop-up ad on the Internet or a flyer stapled to a telephone pole, but when an ad for a “scientific breakthrough in weight loss” appears in well-regarded media, the reputation of the medium lends credibility to the claims. With the media’s assistance, we can crack down on the worst of the weight loss scams and stop them before they ever reach the consumer. In 2003, we published a guide that describes seven claims in weight loss ads that should raise red flags because they are always false.⁷ Our goal was to give the media an easy

⁶FTC, RED FLAG, BOGUS WEIGHT LOSS CLAIMS (2003), *available at* <http://www.ftc.gov/bcp/online/edcams/redflag/falseclaims.html>.

⁷FTC, DECEPTION IN WEIGHT-LOSS ADVERTISING WORKSHOP: SEIZING OPPORTUNITIES AND BUILDING PARTNERSHIPS TO STOP WEIGHT-LOSS FRAUD (2003), *available at* <http://www.ftc.gov/os/2003/12/031209weightlossrpt.pdf>.

and efficient way to screen and reject advertisements that make the “Red Flag” claims. My predecessor, former Chairman Muris, and the other Commissioners were ardent advocates of the Red Flag effort, challenging the media to “do the right thing” and refuse to run these ads.⁸

I am pleased that many in media have done so. In March, we issued a report based on data gathered in 2004, which appear to show that the media have responded to our challenge.⁹ We repeated our survey of weight loss advertisements and, a year after first asking the media for help, we found that the number of ads with Red Flag claims had fallen from almost 50 to 15 percent. Fifteen percent is still too high, but the progress is remarkable. For some of the worst claims – like the promise of substantial weight loss without diet or exercise, the results are even better – they are down from a whopping 43 percent to 5 percent of weight loss product ads. Continued effort is necessary. Nonetheless, these figures suggest substantial progress.

C. Consumer Education

We can also bolster our enforcement efforts by arming our consumers with the tools to spot and avoid ineffective weight loss products. The more educated the consumer, the harder it is for scam artists to make a profit. Our consumer education budget is relatively small, but the ingenuity and talent of our staff are huge. Among our many innovative consumer education techniques have been our teaser sites. Consumers shopping on the Internet for weight loss

⁸FTC Chairman Timothy J. Muris, Do the Right Thing, Remarks Before the Cable Television Advertising Bureau (Feb. 11, 2003), *available at* <http://www.ftc.gov/speeches/muris/030211rightthing.htm>.

⁹FTC STAFF, 2004 WEIGHT-LOSS ADVERTISING SURVEY (2005), *available at* <http://www.ftc.gov/os/2005/04/050411weightlosssurvey04.pdf>.

products may find themselves on a website pitching the fictitious “Fat Foe Eggplant Extract,” which promises that you can “kiss your dieting days goodbye” and “feast on your favorite foods” while still losing up to 10 pounds per week. The Fat Foe teaser site was constructed by FTC staff using the same enticing testimonials, before-and-after photos, and “experts” in white lab coats used by weight loss scam artists. But, when consumers click through to order Fat Foe, they are warned that they could have been scammed and are directed to FTC consumer fact sheets for more reliable information.¹⁰ Our Fat Foe site generated a lot of media attention, but more importantly, it got the attention of consumers. The site has registered more than 100,000 hits to date and hopefully has taught some shoppers to be more cautious.

D. Advocacy to the FDA for Better Nutritional Labeling

The Commission has long been an advocate of government policies that promote truthful diet and health information in the marketplace. In short, we have advocated policies that facilitate, rather than impede, consumer access to nutrition information. For example, the FTC has been coordinating closely with the FDA on its qualified health claims initiative. This is the initiative under which the FDA has begun to permit food companies to make health claims in labeling even when they are supported by less than “significant scientific agreement,” so long as

¹⁰The teaser site for Fat Foe is posted on the Web in both English and Spanish at <http://www.wemarket4u.net/fatfoe/index.html> and <http://www.wemarket4u.net/fatfoe/espanol/index.html>. The FTC consumer fact sheet, “Weighing the Evidence in Diet Ads,” is linked to the Fat Foe teaser site and is also available on the FTC’s web site at <http://www.ftc.gov/bcp/online/pubs/health/evidence.pdf>.

the labeling also clearly discloses the state of the science supporting the claim.¹¹ The more companies can promote the nutrition and health benefits of their products, the more they will be motivated to make improvements in those products. Consumers will have more options, as well as more information to make the right choices for them.

Similarly, the FTC supported the FDA Obesity Task Force by filing a staff comment suggesting specific ways to encourage greater availability and accuracy of calorie and portion size information in food labeling.¹² The FDA's "Calories Count" report¹³ incorporated the FTC staff's suggestions, which were directed at providing consumers more accurate information to make it easier to make those small cuts in caloric intake that, over time, can have a meaningful impact on their weight. Not only do consumers benefit from having such information, but it also spurs food companies to compete based on their products' caloric content. Again, the goal of these policy efforts is to support better consumer access to information and increased incentives for food manufacturers to create healthier, lower-calorie food options.

E. Marketing to Kids Workshop

¹¹See FDA, CONSUMER HEALTH INFORMATION FOR BETTER NUTRITION INITIATIVE, TASK FORCE FINAL REPORT, (July 10, 2003), available at <http://www.cfsan.fda.gov/~dms/nuttftoc.html>.

¹²FTC Staff Comment, *In the Matter of Obesity Working Group; Public Workshop: Exploring the Link Between Weight Management and Food Labels and Packaging*, FDA Docket No. 2003N-0338 (Dec. 12, 2003).

¹³FDA, CALORIES COUNT: REPORT OF THE WORKING GROUP ON OBESITY, (March 12, 2004), available at <http://www.cfsan.fda.gov/~dms/owg-toc.html>.

Our law enforcement and advocacy efforts to date have been directed primarily at the weight problem in the population generally. Only a few marketers have stooped to the level of pushing bogus weight loss pills for children, and, when they have, as in the case of the “Skinny Pill for Kids,” we have acted quickly to stop them.¹⁴ We have determined, however, that the rising rates of childhood obesity warrant attention by the Federal Trade Commission above and beyond our general response to this health issue.

As I alluded to at the beginning, there is a vigorous debate over the many factors that contribute to childhood obesity and the complicated interplay of diet, exercise, genetics, and environment. The debate presents a seemingly endless stream of hypotheses to be tested and proved or disproved. Within this debate, of course, many have focused on whether the marketing techniques of the food and beverage industry are contributing to the poor eating habits of children.

I do not know whether we will ever have the studies that will definitively answer these questions. I do know that we cannot afford to wait to take action. That is why the Federal Trade Commission and the Department of Health and Human Services will hold a public workshop in Washington, D.C. on July 14 and 15, 2005 on “Marketing, Self-Regulation, and Childhood Obesity.” Through this workshop, we will provide a forum for sharing perspectives from all stakeholders on the marketing of food and beverages to children, on industry self-regulatory efforts, and on recent initiatives by individual companies to respond to childhood obesity through changes in their products or their marketing methods.

¹⁴The Commission’s quick intervention in this matter was able to stop the “Skinny Pill for Kids” product before it ever reached the market. *FTC v. The Fountain of Youth Group, LLC et al.*, Civ. Action No. 04CV47J99HTS (M.D. Fl. 2004)(stipulated final order).

I want to be clear that, from the FTC's perspective, this is not the first step toward new government regulations to ban or restrict children's food advertising and marketing. The FTC tried that approach in the 1970s, and it failed for good reasons. But it is an opportunity to examine what is and what is not working and what more can be done in marketing, product innovations, and other approaches to promote healthy food choices and lifestyles for our children.

III. JOINT WORKSHOP WITH HHS ON SELF-REGULATION AND MARKETING FOOD TO CHILDREN

A. The Role of Advertising and Voluntary Industry Initiatives

As suggested by the Institute of Medicine in their 2004 report,¹⁵ one critical topic that we will address is industry self-regulation. While I understand that self-regulation has its share of skeptics, like my predecessors at the Commission, I greatly value the contributions of industry self-regulation. Each day I see the positive benefits that effective self-regulation can bring. Under certain circumstances, industry-generated approaches can address problems more quickly, creatively, and flexibly than government regulation can. Of course, self-regulation works only if it has real substance, if industry members participate, and if there are consequences for non-compliance.

With respect to certain advertising practices, self-regulation has been the best regulatory mechanism. Any form of government limitation on truthful commercial speech faces significant constitutional hurdles. Thus, in addition to significant practical and policy reasons weighing

¹⁵*Preventing Childhood Obesity: Health in the Balance*, Committee on Prevention of Obesity in Children and Youth, Food and Nutrition Board, Institute of Medicine (2004).

against government restrictions, any proposal for government regulations broadly restricting food advertising to children would have to pass muster under the First Amendment.¹⁶ Under that test, the government would first have to convince the courts that advertising negatively affects children’s health, or at least that restricting food advertising to children would directly advance their health.¹⁷ Establishing evidence of such a cause and effect is, at best, a difficult undertaking. The second hurdle would be even greater. The government would need to show that there are no options to protect children’s health that would not involve limiting speech.¹⁸ Because commercial speech, including advertising, is a valuable source of information to consumers, the Supreme Court clearly disfavors approaches that restrict speech.¹⁹ In addressing childhood obesity, the government would first have to consider whether other approaches, such as increasing nutrition education in schools, would be viable. As the Court clearly stated in a case in which it rejected FDA regulations restricting certain advertising claims, “If the First Amendment means anything, it means that regulating speech must be a last – not first – resort.”²⁰ This reflects the Court’s view, which I also embrace, that the free flow of truthful information benefits consumers and competition.

¹⁶*See Central Hudson Gas & Elec. Corp. v. Pub. Serv. Comm’n*, 447 U.S. 557 (1980)(articulating a four-part test for evaluating whether government restrictions on commercial speech are constitutional under the First Amendment).

¹⁷*Id.* at 566.

¹⁸*Id.*

¹⁹*See, e.g., Rubin v. Coors Brewing Co.*, 514 U.S. 476, 490-91 (1995)(stating that if government can achieve its interests in a manner that does not restrict speech, or that restricts speech less, it must do so); *see also 44 Liquormart, Inc. v. Rhode Island*, 517 U.S. 484, 507 (1996).

²⁰*Thompson v. Western States Med. Ctr.*, 535 U.S. 357, 373 (2002).

Self-regulation, of course, does not raise the same issues. For example, there is no First Amendment bar on the Motion Picture Association of America's self-imposed program to rate movies or on the movie theaters' refusal to admit children under 17 to R-rated movies.²¹ Similarly, the electronic games industry, through its Entertainment Software Rating Board, rates virtually all video games, and enforces an advertising code that restricts the marketing of Mature-rated games to children; many retailers now are using those ratings to prohibit the purchase of such games by young children.²² Again, the industry is free to take such action, whereas the same requirements, if imposed by government, would raise First Amendment concerns.

Of course, there are other reasons why self-regulation may be preferable to government intervention. Where self-regulatory organizations have obtained the support and participation of industry, their guidelines and principles are likely to be well-attuned to the realities of that market. Taking advantage of the accumulated judgment and hands-on experience of the industry members, self-regulatory bodies have often devised workable rules where government regulations would be unwieldy. The result is an approach that is at once more effective and less burdensome. And often the rules or guidelines developed will represent a broad cross-section of industry views, because participants will not want to risk significant refusals to participate, which would undermine the entire scheme.

²¹Ratings are assigned by the Classification and Rating Administration, which is affiliated with the MPAA. MOTION PICTURE ASSOCIATION OF AMERICA, MOVIE RATINGS, HOW IT WORKS (2005), available at <http://www.mpaa.org/movieratings/about/index.htm>.

²²ENTERTAINMENT SOFTWARE RATING BOARD, ESRB GAME RATINGS (2005), available at <http://www.esrb.org/esrbratings.asp>.

Self-regulatory dispute resolution may also be less adversarial and more efficient than more formal legal or regulatory procedures for disputes both among industry members and between consumers and industry. And if the process is sufficiently objective and transparent, it permits the public to judge the integrity of the review system and increases confidence in self-regulation.

For all of these reasons, I am hopeful that industry-initiated action to respond to concerns about advertising and marketing of food to children is a promising avenue. Your own efforts, not government-imposed mandates, are more likely to achieve responsible marketing to encourage better nutrition and health choices for our children.

B. Goals of the Workshop

Even if you are convinced that food marketing has played no role in childhood obesity, you should still be able to agree that advertising can be part of a solution. Advertising and marketing of healthier foods to both kids and parents can be part of the effort to address the problem of overweight and poor nutrition among our nation's children.

Who here isn't familiar with the ad campaign featuring Smokey Bear admonishing "Only YOU can prevent forest fires?" Since its inception in 1944, that campaign has been credited with reducing the number of acres lost annually from 22 million to 4 million.²³ As far as I know, no one had accused the advertising industry of contributing to the problem of forest fires, but advertising helped combat it. The advertising community can do the same here.

²³*Forest Fire Prevention – Smokey Bear (1944-Present)*, The Ad Council, available at http://www.adcouncil.org/campaigns/historic_forest_fire_prevention.

As the IOM report recognized, “there is great potential for the media and entertainment industries to encourage a balanced diet, healthful eating habits, and regular activity.”²⁴ Some entertainment companies, such as Nickelodeon and Disney, are already applying their marketing know-how to educate children about nutrition. Some food and beverage companies, for example, Kraft and PepsiCo, are also responding to the childhood obesity problem with changes to their products and practices. Just recently we have learned that Sesame Street’s Cookie Monster will now be singing “‘C’ is for carrots and cantaloupes” and not just for cookies. Collectively, these individual actions are already bringing about changes in the way foods are marketed to children.

The FTC/HHS workshop will take a snapshot of the current state of food and beverage marketing to children, review existing self-regulatory efforts, and examine some of the many initiatives taken by individual companies to modify their products or marketing techniques to promote healthier food choices. Our goal is to share perspectives from a variety of stakeholders and determine whether there are ways to build on and enhance what is already being done.

C. Themes to Be Explored at the Workshop

Today, the Commission and HHS are releasing the text of a Federal Register Notice that describes our workshop in more detail and outlines the issues we plan to explore.²⁵ The Notice seeks written comment on a number of topics and questions from any and all interested parties

²⁴*Preventing Childhood Obesity: Health in the Balance*, Committee on Prevention of Obesity in Children and Youth, Food and Nutrition Board, Institute of Medicine (2004), Exec. Summary at 9.

²⁵Public Workshop: Marketing, Self-Regulation, & Childhood Obesity, 70 Fed. Reg. 25060 (May 12, 2005). Additional information about the workshop is posted on the FTC’s web site at <http://www.ftc.gov/bcp/workshops/foodmarketingtokids/index.htm>.

and invites requests for panelists to participate in the workshop. Comments and requests to participate are due by June 9th.

Painting a broad brush, we plan to examine six areas. First, the workshop will provide an opportunity to briefly explore some of the literature on the connection, if any, between the marketing of food and beverages to children and childhood obesity. The workshop will also highlight some of the many other factors that health experts say may contribute to this problem. Marketing of foods to children is only a part of that puzzle, but nonetheless a highly visible one. I will warn you that any discussion of the research likely will be neither comprehensive nor dispositive. There is much that the research can tell us and much that it cannot. It may never be possible to resolve inconsistent findings or reach any irrefutable conclusions about why our children are getting heavier. Still, we think it will be useful to review what is out there.

Second, we will review and try to define the full scope of food and beverage marketing to kids. Traditional forms of marketing – like television advertising – are only part of that picture. We want to make sure that we look at all of the channels and techniques used by food and beverage companies to reach children, either directly or indirectly through their parents. We know that children are spending more time on the Internet, for instance, and that “advergaming” has become a new technique to reach children. We do not want to forget about the substantial investments that marketers make to reach children through product packaging and in-store promotions. We also need to include marketing that occurs in particular venues, like schools, and the use of specific techniques like licensing of popular children’s programming and movie characters. We need a solid understanding of the entire universe that constitutes marketing to

children before we can evaluate how effective any self-regulatory proposal or other initiative is likely to be.

A third area of inquiry will be an examination of existing industry efforts to promote responsible marketing of food and beverages to children through self-regulatory programs. We will, of course, look at industry-wide guidelines like those enforced by the Better Business Bureau's Children's Advertising Review Unit, or CARU.²⁶ CARU has long played a role on all advertising issues related to children, and I know that they are actively reviewing their guides to keep up with the evolution of advertising. I am hopeful that, by bringing together a wide range of stakeholders, we may be able to identify ways to help CARU and others establish even more effective programs. As part of our discussion of industry-wide self-regulation, we expect to hear about the pros and cons of alternative approaches that have been suggested by advocacy groups like the Center for Science in the Public Interest or that are already in use in other countries.

Fourth, we will also be looking at the efforts of individual companies to promote healthier food choices for children, both in the food and beverage industry and in the media and entertainment industry. There are many examples of innovative approaches to the obesity challenge. Some companies have built in nutritional messages in product promotions. Others have changed the nutritional profile of products, or the overall mix of their product line. Others have repackaged or resized products to discourage overeating, or have limited the products expressly targeted to younger children. We also expect to hear from media companies about

²⁶CARU's guides include basic principles for responsible advertising directed to children under 12, as well as principles that relate to specific advertising techniques. A number of these principles directly apply to how foods and beverages are marketed to children. *See Self-Regulatory Guidelines for Children's Advertising*, Children's Advertising Review Unit, Council of Better Business Bureaus, Inc., available at <http://www.caru.org>.

marketing standards they have developed. There is much to be gained by gathering these companies together to share their experiences, whether successful or not.

Fifth, we will look at the role of positive nutritional messages. As the Commission has learned in so many areas, consumer education is a vital part of the solution to any consumer protection challenge. So we will want to hear about the effectiveness of efforts by industry members, media companies, government, public advocacy groups, and others to educate children and their parents about healthier foods and the importance of good nutrition and a healthy lifestyle.

And finally, we want to leave the workshop with some sense of how we can build on, enhance, and replicate existing programs and initiatives to promote responsible food and beverage marketing to children and to promote healthier food choices. I hope that we will be able to identify some concrete steps that industry, government, and public policy groups can take together to make progress against childhood obesity. I do not expect that we will have all the answers or even know all the questions that need to be answered. But if we all come to the table prepared to examine carefully and constructively what can be done, then the two days will be productive.

IV. CONCLUSION

In holding this conference, I am not forgetting the key role that parents play, particularly in deciding what foods their young children eat. Studies show that children often emulate their parents, including their eating habits.²⁷ Recognizing the importance of parental responsibility, however, is not inconsistent with asking the food industry to use its creativity to make good foods, healthy lifestyles, and good dietary practices fun and appealing to kids.

As I noted earlier, some food marketers are already responding. Others can join with them and compete in developing and offering healthier products that taste great, are convenient, and are fun. With more choices, and more benefits, parents can be given more information about healthy foods, prompting greater demand for these products. Creative industry initiatives and vigorous self-regulation can help make this beneficial cycle work even better.

The Commission will do all it can to facilitate creative, innovative and effective industry initiatives. Although I am encouraged by what I have already seen, more could be done. The challenge for industry is to keep up the momentum. Downplaying the concerns of parents and public health groups is not good business. If industry fails to take positive steps, others may try to step in and act for them. Some have already called on government to regulate rather than facilitate. Their voices may grow if industry does not demonstrate a good faith commitment to this issue.

In closing, I would like to emphasize the potential for advertising to be a positive force in this area. I am sure that no one in this room doubts the power of advertising to shape consumer

²⁷For a discussion of the research on parents as role models for their children's eating behavior, see *Preventing Childhood Obesity, Health In the Balance*, Committee on Prevention of Obesity in Children and Youth, Food and Nutrition Board, Institute of Medicine (2004) at 305-306.

demand and choices. Similarly, the FTC is a big believer in advertising as a promoter of competition in our free market society. That is why I am so hopeful that the food marketing and advertising industries will take advantage of the FTC/HHS workshop. I hope you will join us at the workshop.

Thank you.