



Parents Television and Media Council
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November 17, 2022

Lina M. Khan, Chair
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairwoman Khan,

In the aftermath of the 1999 school shootings at Columbine High School in Littleton, Colorado, when it was revealed that the school shooters displayed interest in violent, R-rated movies and M-rated, first person-shooter video games, the United States Congress held hearings to investigate the marketing of adult (specifically, violent) entertainment to children.

During those hearings, and in a subsequent investigation by your agency, it was revealed that many entertainment companies were deliberately targeting children in the marketing of adult-rated content. Your agency found, for example, that movie studios repeatedly advertised R-rated films on television programs that were rated highest among teens or where teens comprised the largest share of the audience. In addition, internal memos discovered by the Commission referred to the target market for one video game as “males 17 - 34 due to M rating” and then in parentheses stated: “(the true target is males 12 - 34).”

At the conclusion of that investigation, the Federal Trade Commission urged the implementation of policies across the entertainment industry to ensure that entertainment products were not “marketed in a manner inconsistent with their rating.”

As far as we are aware, it has been more than a decade since the FTC followed-up on its review of the marketing of adult entertainment to children, but I am writing you today to urge your agency to renew its efforts to hold the entertainment industry accountable for how it markets content to children.

Though much has changed in the intervening 22 years since the FTC first delved into this issue, this much has not changed: Hollywood is still trying to do an end-run around parents, deliberately targeting children and teens in the marketing of their adult-rated entertainment products on the platforms that teens use the most.

The Parents Television and Media Council just concluded an investigation into the marketing of adult-rated entertainment products to children age 13-17 on social media platforms like TikTok and Instagram.

Because Our Children Are Watching...

Researchers created accounts on Instagram and TikTok for a 13-year-old user, and found:

- HBO appears to be heavily invested in using TikTok and Instagram as a marketing platform for its original series. Unlike other titles the PTC looked at for this analysis, the “#euphoria” hashtag alone took users to a landing page that seems to carry the network’s branding. On Instagram, the “Euphoria” official page has 7.8 million followers, while 60+ users have their own “Euphoria” fan pages; and the “Euphoria” tag was used on over 3.7 million posts. On TikTok, the hashtag “euphoria” had amassed nearly 50 billion views as of August 2022.
- *Big Mouth’s* Official TikTok account has 36.5k followers and the hashtag “#bigmouthnetflix” has 241.5 million views, an additional 44 hashtags tied to the program add up to millions of additional views.
- With 676.5 million views on TikTok for the hashtag, “sexeducationnetflix,” there is no doubt that the teens on TikTok are familiar with this Netflix MA-rated series. The official Instagram account also number 4 million followers.
- Hulu’s provocatively named, teen-targeted series, “pen15,” appears to have a larger following on TikTok than on Instagram, where the official page claims only 106k followers. But a search for “#pen15hulu” yields 65.9 million views.
- Netflix’s *Squid Game’s* global success in the fall of 2021 can be largely, if not entirely attributed to social media and word-of-mouth. As of this writing, the hashtag #SquidGame had garnered 76.8 billion views on TikTok. By late October 2021, worldwide, *Squid Game* had received more than 12 million mentions across social media platforms and a reach of more than 36 trillion. The viral marketing of *Squid Game* even trickled down to younger audiences through Roblox, Minecraft, and YouTube – sparking interest in the series among viewers too young to handle the intensely violent content.

Hollywood is doing an end-run around parents by marketing sexually explicit TV-MA-rated content directly to children and teens on social media sites popular with 13-17-year-olds. Programs like *Euphoria*, *Big Mouth*, *Sex Education*, *PEN15*, and other mature-rated titles that feature youth characters are filled with dark, depraved, and sexually exploitive content. The TV-MA rating should, in theory, serve as a gatekeeper for children seeking to learn more about the program. But social media gives children great access into these shows, whether their families subscribe to a particular streaming platform. And Hollywood is using that back door to do just that.

Marketing mature-rated content to children and teens sends a confusing message to parents and increases the likelihood that kids will be exposed to media content that the ratings indicate is inappropriate for them.

For years Hollywood has been promising responsible self-regulation, and for years they have dramatically and repeatedly violated the public’s trust.

On behalf of the PTC's 1.5 million members, I am asking you to once again open an investigation into the marketing of adult content to children.

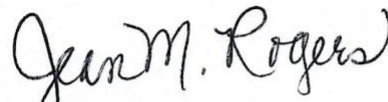
We cannot simply shrug-off Hollywood's broken promises and continued efforts to target the most impressionable and vulnerable members of society in their marketing of sexually graphic, exploitative and age-inappropriate entertainment products. The overwhelming consensus of the medical community is that children are harmed by these media messages. And even the most vigilant of parents is unable to anticipate the frequency with which children are being bombarded with content designed to pique their interest in mature-rated entertainment products.

It is high time for the producers and distributors of such harmful entertainment products to be held accountable for their irresponsible marketing practices. On behalf every family in America, I ask that the Commission initiate an immediate review of this matter.

Sincerely,



Melissa Henson
Vice President of Programs,
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Director, Screen Time Action Network
at Fairplay



Lisa Honold
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Cc. PTC Membership