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May 25, 2006

Donald Clark  
Federal Trade Commission  
600 Pennsylvania Ave., N.W.  
Washington, DC 20580

Dear Mr. Clark:

The American Academy of Pediatrics (AAP), representing 60,000 pediatricians, urges you to investigate the complaint filed May 1, 2006 by the Campaign for a Commercial Free Childhood over the advertising and marketing of baby videos by Baby Einstein and Brainy Baby.

For more than 20 years, the Academy has been concerned about the impact media can have on the health, attitudes and behaviors of children. Scientific research has identified both positive and negative results for some age ranges. The Academy has offered recommendations to pediatricians and parents based on that research.

Up until the mid 1990s, the media industry overwhelmingly targeted preschoolers and older children, but an untapped market was discovered: infants and toddlers. As new research was unveiled about the first three years of life --a period of intense physical, intellectual and social growth--parents were primed to give their babies the best start. Entertainment companies started to market products (e.g. television programs) for those 6 months and older, claiming they helped with development. In 1999, the Academy issued its Media Education policy statement, recommending no television for children younger than two. Since that time we have revised the recommendation to no screen time for children younger than two to include video products, for example.

Research on early brain development shows that babies and toddlers have a critical need for direct interactions with parents and other caregivers for healthy brain growth and the development of appropriate social, emotional, and cognitive skills. These infant videos are marketed under the guise of being educational. The company names alone, Brainy Baby and Baby Einstein, are proof of the marketing strategy. There is no current evidence to prove that these videos help infants and toddlers in an intellectual or developmental way. Parents should know that their babies will develop just fine without watching these videos.

The reality is that parents play the videos to give themselves some time to do other household chores, like cooking dinner or doing laundry. However, they shouldn't be led to believe that it helps their baby. For those parents who choose to purchase these products, the Academy would suggest strongly that a disclaimer be included on the package labeling. Until definitive peer-reviewed research is completed regarding these products, parents should be warned that the impact on their baby is unknown. Parents should also be alerted to the AAP recommendation of no screen time for those younger than two.

FTC baby video complaint

Page 2

Truth in advertising and marketing is needed in this arena, and that's why we are asking the FTC to pursue this complaint. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Eileen M. Ouellette, M.D., J.D., FAAP". The signature is written in a cursive style and is centered within a light gray rectangular box.

Eileen M. Ouellette, MD, JD, FAAP  
President

EMO/mlt