



Clicking with Kids: Alcohol Marketing and Youth on the Internet

About the Center on Alcohol Marketing and Youth (CAMY)

The Center on Alcohol Marketing and Youth at Georgetown University monitors the marketing practices of the alcohol industry to focus attention and action on industry practices that jeopardize the health and safety of America's youth. Reducing high rates of underage alcohol consumption and the suffering caused by alcohol-related injuries and deaths among young people requires using the public health strategies of limiting the access to and the appeal of alcohol to underage persons.

The Center is supported by grants from
The Pew Charitable Trusts and the Robert Wood Johnson Foundation
to Georgetown University.

Acknowledgment:

We thank Rex Briggs, Principal, Marketing Evolution; Kathryn Montgomery, PhD, Professor, Public Communication division, School of Communication, American University (Montgomery is also the former president of CME); and Victoria J. Rideout, MA, Vice President and Director, Program for the Study of Entertainment Media and Health at the Henry J. Kaiser Family Foundation for their review and comments. The opinions expressed in this report are those of the authors and do not necessarily reflect those of the foundations or the reviewers.

March 2004

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Table of Contents

I.	Introduction	1
II.	Key Findings	2
III.	Youth Online	4
IV.	Underage Access to Alcohol Web Sites	5
V.	The Games in the Alcohol Arcade	7
VI.	A Brave New World	9
VII.	When Is a Cartoon a Cartoon, or Not?	19
VIII.	“Carding” on the Internet	22
IX.	Conclusion	24
X.	Appendices	25

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I. Introduction

As the Internet has soared in popularity among teenagers in the last decade, public health policymakers have repeatedly shown concern about the appeal and attraction of alcohol Web sites to underage youth. In a nationwide poll conducted last summer, 65% of parents found “very troubling” that alcohol Web sites feature video games and other elements that may appeal to youth.¹ The Center on Alcohol Marketing and Youth (CAMY) offers with this report the most up-to-date cataloguing of the features found on alcohol Web sites and believed to be attractive and appealing to underage youth, as well as an assessment of how easily these sites can be accessed. In addition, this report provides the first public analysis of underage traffic to alcohol Web sites, finding that nearly 700,000 in-depth visits² to 55 alcohol Web sites during the last six months of 2003 were initiated by underage persons.

In 1997 and 1999 the Center for Media Education (CME) issued two major reports on alcohol Web sites.³ The first detailed content on alcohol Web sites that could appeal to underage youth, and the second reviewed the effectiveness of filters and rating systems as means to restrict underage youths’ access to these sites, given their potential for appeal to young people. The Federal Trade Commission (FTC) also reviewed alcohol Web sites in 1997 after the initial round of concerns was raised about their appeal to underage youth.⁴ As a result of these concerns, the Beer Institute and the Distilled Spirits Council of the United States (DISCUS) revised their advertising codes in 1997 and 1998, respectively, to address them.⁵ Those revisions consisted of having companies: (1) post “reminders” of legal drinking age on Web sites, (2) make alcohol Web site addresses available to parental control software companies, and (3) apply all provisions of marketing codes to Web sites, especially provisions prohibiting content “intended to appeal primarily” or “particularly attractive” to underage youth.⁶ These revisions remain the essential elements of the industry’s marketing codes today when it comes to the Internet. Finally, in its 1999 and 2003 reports requested by Congress on the alcohol industry’s advertising and marketing practices, the FTC reported its own findings about features that could attract underage youth, the ease of access to alcohol Web sites, and recommendations to the industry on how to try to restrict access.

When CME first reviewed alcohol Web sites, it found widespread use of features considered attractive to youth: interactive games, cartoons, chat rooms and bulletin boards, logoed clothing and downloads such as wallpapers and screensavers.⁷ In its 1999 report, the FTC looked for these same features and found the continued presence of many of them, although chat rooms and bulletin boards were no longer common. Because of the continued use of some of those features by the alcohol industry, the FTC called on the industry in 1999 “to avoid content that would attract underage consumers” and to take steps to restrict access to their Web sites. For the most part, the access recommendations were aimed at self-regulation by the user, who would either type in his/her birthday or affirm being at least 21 years of age.

1 Memorandum, “Results of a National Survey of Parents,” from Peter D. Hart Research Associates, Inc./American Viewpoint to All Interested Parties, Washington, DC, June 24, 2003, 4. The poll was conducted for CAMY and is available at <http://camy.org/research/files/hartmemo0703.pdf> (cited 6 January 2004).

2 In-depth visits, reported by comScore Media Metrix, have been defined by CAMY as visits that resulted in more than two page views. This distinction has been used to eliminate from the analysis visits initiated by underage persons who were deterred by a Web site’s age verification process, and thus viewed fewer than three pages.

3 Center for Media Education, *Alcohol and Tobacco on the Web: New Threats to Youth* (Washington, DC: Center for Media Education, 1997); Center for Media Education, *Youth Access to Alcohol and Tobacco Web Marketing: The Filtering and Rating Debate* (Washington, DC: Center for Media Education, 1999).

4 Federal Trade Commission, *Self-Regulation in the Alcohol Industry: A Review of Industry Efforts to Avoid Promoting Alcohol to Underage Consumers* (Washington, DC: Federal Trade Commission, 1999), 8.

5 Federal Trade Commission, *Self-Regulation in the Alcohol Industry*, 7-8.

6 Federal Trade Commission, *Self-Regulation in the Alcohol Industry*, 7.

7 Center for Media Education, *Alcohol and Tobacco on the Web*, 27-40.

For its September 2003 report, *Alcohol Marketing and Advertising: A Report to Congress*, the FTC surveyed more than 80 alcohol Web sites and found only a dozen sites with interactive features, “such as the opportunity to play a game like dominoes or to click on images of men and women in a cocktail lounge to see what they are saying. These features are presented in a slow-paced, low-key manner; their appeal to today’s youth is uncertain.”⁸ As for the issue of access, the FTC report found that the industry had heeded its 1999 recommendation to have potential underage users self-regulate their access by having to state they are over 21.⁹ The FTC did not list which sites it surveyed, saying only that they were sites operated by the nine companies that provided the agency information at its request.¹⁰ CAMY included more than 35 sites operated by those nine companies in its review.

So, what is the state of alcohol in cyberspace today?

II. Key Findings

Over a three-week period in October and November 2003, CAMY reviewed 74 Web sites operated by alcohol companies and found widespread use of the kinds of features first catalogued by CME as potentially attractive to underage youth. From video games to downloadable pictures of young women usually reserved for teenage male fantasies to the interactive toys of today’s computer-literate youth such as instant messaging (IM) accessories and customized music downloads, alcohol Web sites offered a parade of attractions that appear to have little to do with the quality or taste of the alcohol product but speak loudly to the culture and mores of the Internet user. At the same time, the alcohol Web sites offered almost no effective mechanisms to keep underage youth from accessing them despite the various steps—reminders of the legal drinking age on the Web site or asking for a birth date, in essence self-policing by the Internet surfer—taken by the industry and called for by the FTC.

CAMY reviewed alcohol Web sites for content from October 22 to November 11, 2003, using categories initially identified by CME as attractive to youth. In its review CAMY found:

A. Games

- Ten of 15 (67%) beer Web sites featured games such as putt-putt golf, a water-balloon toss, pinball, shooting aliens, car races, a quiz on brewing beer, digital football, and a quiz on the bands (e.g., Blink 182, Def Leppard and Saliva) headlining a recent concert tour.
- Seven of 19 (37%) distilled spirits sites featured games such as air hockey, football trivia, video football, a quiz on drink recipes, and a slot machine.
- Four of 12 (33%) malternative¹¹ sites featured games such as spin the bottle and car races.
- Only one of 28 (4%) wine Web sites featured a game, and it was a quiz about the user’s “wine profile.”

B. Interactive and High-Tech

- Downloadable screensavers for personal computers were featured on eight of 15 (53%) beer sites; 10 of 19 (53%) distilled spirits sites; four of 12 (33%) malternative sites and three of 28 (11%) wine sites. The screensavers generally promoted the particular brand, although some were more iconic, including one with bottles and lemons floating underwater and another with a race car.
- Downloadable wallpapers for personal computers were featured on 10 of the 15 (67%) beer sites; nine of the 19 (47%) distilled spirits sites; seven of the 12 (58%) malternative sites and four of the 28 (14%) wine sites. Like the screensavers, the wallpapers generally promoted the particular brand but occasionally also provided iconic images such as race car drivers, beach scenes and a brewery.
- Computer technology offers an interactive and high-tech experience unlike almost any other medium, and the alcohol Web sites offered a wide range of these features. From animation to downloadable, customized music to IM accessories to e-mail features (including one site that allows the sending of “talking” e-mails using animals like hamsters and frogs), alcohol Web sites took full advantage of computer technology and culture. These high-tech/interactive features were found on 13 of the 15 (87%) beer sites; 16 of the 19 (84%) distilled spirits sites; eight of the 12 (67%) malternative sites and 16 of the 28 (57%) wine Web sites.¹²

⁸ Federal Trade Commission, *Alcohol Marketing and Advertising: A Report to Congress* (Washington, DC: Federal Trade Commission, 2003), 17.

⁹ Federal Trade Commission, *Alcohol Marketing and Advertising*, 17.

¹⁰ Federal Trade Commission, *Alcohol Marketing and Advertising*, 17.

¹¹ “Malternatives” are also referred to as “low-alcohol refreshers,” “alcopops,” or “flavored malt beverages.” Many of the brands in this category, which includes brands such as Mike’s Hard Lemonade and Smirnoff Ice, contain roughly the same amount of alcohol as beer. See, e.g., Federal Trade Commission, *Alcohol Marketing and Advertising: A Report to Congress* (Washington, DC: Federal Trade Commission, 2003), 2.

¹² CAMY considered animation to include any image made to move on the site, including but not limited to streaming video of television commercials, bouncing images or words scrolling across the page; high-tech interactive features included.

C. Cartoons and Graphics

- Cartoon figures and computer-generated graphics were featured on nine of the 15 (60%) beer sites; eight of the 19 (42%) distilled spirits sites; eight of the 12 (67%) malternative sites and five of the 28 (18%) wine sites.¹³

D. Kids in Alcohol Land

Much of the concern about content on these Web sites stems from the difficulty in keeping underage youth from accessing them. As the FTC wrote in 1999:

There are, of course, no foolproof measures to prevent underage access to inappropriate Web sites. Companies therefore need to give special attention not only to restricting access, but to ensuring that Web site content is not attractive to underage consumers. Many alcohol Web sites feature one or more promotional techniques—contests, games, cartoon and cartoon-like characters, chat rooms and bulletin boards—that underage visitors may find attractive and that alcohol companies generally do not use in other forms of advertising.¹⁴

In its 2003 report, the FTC credited the industry with following its recommendations to limit access by having users state they are older than 21:

All of the brewers' sites and most of the vintners' sites had responded to the recommendation, and featured such a system. Most of the distillers' sites instead required that visitors click on a box stating that they are of legal age before entering the site; however, DISCUS has now modified its code to require use of an age verification mechanism which could consist of requiring visitors to enter a birth date over the age of 21 in order to enter an alcohol advertising site.¹⁵

CAMY's findings were similar to the FTC's. Most of the 74 alcohol Web sites reviewed for content by CAMY did require the user either to enter a birth date or to affirm the user was 21 or older. However, there was no age verification mechanism on any of the sites to assure or test the accuracy of the statements made by the user. As CME wrote in 1999, "How many 16-year-olds would be unable to come up with a 'fake' birthday that would afford them access to the site?"¹⁶ This inability to "card" on the Internet was also recognized by the FTC in its most recent report:

The Commission recognizes that some consumers may indicate an inaccurate date of birth. So long as web site content is not likely to appeal to minors, however, the requirement to enter date of birth may be sufficient, as the alternative is to require site visitors to provide sufficient personal information to permit verification of their adult status.¹⁷

In the first publicly released analysis of underage traffic to alcohol Web sites, data provided to the Center show that nearly 700,000, or 13.1%, of the total in-depth visits to 55 alcohol sites during the last six months of 2003 were initiated by persons under age 21.¹⁸ The data and analysis on these site visits were provided to the Center by comScore Media Metrix, a leading Internet audience measurement service.

Two distilled spirits Web sites led in the percentage of in-depth site visits initiated by underage persons. One site—www.bacardi.com—received almost 60% of its in-depth visits from underage persons, and a second site—www.skyy.com—received almost half of its in-depth visits from underage persons.

Two beer Web sites led in the absolute number of underage in-depth site visits. Both sites—www.budlight.com and www.budweiser.com—had more than 90,000 in-depth visits by underage persons.

In looking at underage visits to alcohol Web sites by category, 15.2% of the in-depth visits to 18 distilled spirits sites were initiated by underage visitors, and 12.8% of the in-depth visits to 16 beer sites were initiated by underage visitors. Six Web sites for malternatives received 8.8% of their in-depth visits from underage youth.

Visitation levels to 15 sites in the wine category were not sufficient to provide reliable results.

In its 2003 report, the FTC noted that, "Three companies provided data showing that between 30% and 70% of consumers exit a site rather than entering their date of birth. It is not known whether this is because they are underage, wish to avoid the inconvenience, or are concerned about privacy."¹⁹ The FTC did not report any data about actual underage visits to alcohol Web sites in its 2003 study.

13 CAMY considered a "cartoon" to be any image that looked like it could be drawn by hand and that resembled in style a cartoon character or scene. Cartoons were prevalent in many of the interactive games. Computer-generated graphics were included in this category, as long as their style was considered cartoon-like.

14 Federal Trade Commission, *Self-Regulation in the Alcohol Industry*, 12-13.

15 Federal Trade Commission, *Alcohol Marketing and Advertising*, 17.

16 Center for Media Education, *Youth Access to Alcohol and Tobacco Web Marketing*, 8.

17 Federal Trade Commission, *Alcohol Marketing and Advertising*, 18.

18 CAMY requested visitation data from comScore Media Metrix for 75 brand-specific alcohol Web sites in the beer, distilled spirits, malternative and wine categories. Using its representative panel of approximately 1.1 million U.S. Internet users who have given comScore explicit permission to confidentially capture their Web-wide browsing, buying and other transaction behavior, comScore provided category visitation data, based on traffic to 55 of the sites provided. Visitation to the remaining 20 sites was not detected among comScore's panel members. comScore provided further insight into consumer behavior at alcohol sites by reporting visitation data—on an individual site basis—for 22 sites that met the minimum reporting criteria of 25,000 visits for the six months ending December 2003. From its panel, comScore delivers the most comprehensive view available of consumer activity—both online and offline. comScore has developed a statistical methodology to ensure the accuracy and reliability of projections to the total population based on its network.

19 Federal Trade Commission, *Alcohol Marketing and Advertising*, 17.

E. What Can Parents Do?

In addition to its analysis of underage traffic to alcohol Web sites and review of Web-site content, CAMY also tested the leading parental control software packages and the parental controls in two leading Internet service providers to determine how effectively parents could block access to alcohol Web sites. CAMY found wide and uneven variations among the programs: one blocked access to 71 of 72 Web sites reviewed, while two only blocked access to four sites and one failed to block access to any alcohol Web site. Seventy-six percent of alcohol brands eluded parental controls half the time or more. This review was conducted from April to August 2003.²⁰

Table 1: Ability of Parental Controls to Block Alcohol Sites, By Program

Program	Number of Sites Blocked	% of Sites Blocked
MSN 8.0	71	99%
Cyber Patrol 6	50	69%
AOL 8.0	49	68%
Norton Internet Security 2003	48	67%
Cyber Sitter 2002	26	36%
Net Nanny 5	4	6%
Cyber Sentinel 2.0	4	6%
McAfee Parental Controls	0	0%

²⁰ Of the eighty Web sites, results for six sites for the content review procedure and eight sites for the access tests were eliminated from the study to address discrepancies found during the testing procedures, leaving 74 sites reviewed for content and 72 tested for access. See Appendix A for details.