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As a prevention advocate, dedicated to reducing underage drinking, I wish to express concern about any increase in advertising. While I recognize the need to allow businesses reasonable opportunities to advertise their product, care must be taken to ensure youth aren't adversely affected.

I compliment staff who heard prevention concerns expressed during the Advisory Committee meeting and pared down the list of customer give-aways and items that are attractive to youth. From a prevention perspective, no change in the original rule is preferable. It would be good if the Commission would consider location of advertising in its rule. Advertising and promotional material in places where no one under 21 can be present is not a problem. Unfortunately, most "points of sale" and other areas for advertising will be in places where youth are present.

The Commission should be especially concerned about anything that contributes to underage drinking. While the nation as a whole has experienced some decline in youth drinking, Oregon's rates are stuck at high levels. Advertising does encourage youth consumption as evidenced by the following studies:

1. Alcohol advertising impacts kids behavior

A landmark longitudinal study published in the Archives of Pediatrics and Adolescent Medicine in 2006 found that youth who saw more alcohol advertisements on average drank more; and, youths in markets with greater alcohol advertising expenditures drank more. The study, funded by the National Institute of Alcohol Abuse and Alcoholism, polled over 1800 youth in the top 75 media markets. They were interviewed as a panel four times over 3 years. According to the Center on Alcohol Marketing and Youth (CAMY), "Since 2001, at least seven peer-reviewed longitudinal studies have found that young people with greater exposure to alcohol marketing are more likely to start drinking than their peers."

2. Youth see a lot of alcohol advertising

In fact, youth see more alcohol ads per capita than adults. The Center for Alcohol Marketing and Youth at Georgetown University conducted extensive studies of alcohol advertising on TV, radio, in magazines and on the web. They found that youth exposure to TV advertising increased 38% from 2001 to 2007. Almost 2/3 of the over-exposure came from cable advertising. Significant "over-exposure" was also found in magazines, on the radio and on websites.



3. Alcohol-branded hats, t-shirts and posters are not harmless

A study by the Rand Corporation of over 1,700 six-graders in South Dakota found that 19% actually owned alcohol promotional t-shirts, hats or posters. Those 19% were **twice** as likely to drink or to intend to drink as others who did not own these items. The researchers were surprised with the finding and noted that “it probably is a subtle communication to kids that beer drinking is cool.”

The Commission is urged to consider this evidence when it makes a determination on this rule.