

September 11, 2008

W. Leo Kiely, III, CEO MillerCoors Brewing Corporation 3939 West Highland Boulevard Milwaukee, WI 53208

Re: Internet Marketing of Sparks

Dear Mr. Kiely:

We are writing to demand that MillerCoors Brewing Corporation immediately discontinue its youth-oriented and egregiously tasteless promotion of Sparks products on the website, www.heavy.com.

Sparks' sponsorship of several videos on the web site associates the product with illegal drug use; crude, vulgar, and offensive language; degrading images of women; and gratuitous and explicit sexual activity. The "Tiny Entourage" videos, parodies of the HBO, late-night "Entourage" series, function as ads for Sparks products, which are present throughout. In addition, the videos appear constantly within a frame of Sparks advertising, much of it using off-beat, colorful, youth-oriented language. That wraparound advertising also links directly to the Sparks website, which any visitor can enter by providing a birth date that makes them seem, correctly or not, 21 years or older.

Although underage persons may not be the sole targets of this sponsorship, they are unquestionably a sizable part of the intended audience. Unlike the actual "Entourage" show that broadcasts at 10 PM on HBO, <a href="www.heavy.com">www.heavy.com</a> is available 24 hours a day. The drugs, sex, and humor have clear appeal for young people, including many below the minimum legal drinking age. Notably, the company website touts Heavy.com as "one of the Web's leading destinations for men 18-34," and claims that "the Heavy Men's Network reach[es] over 17MM men ages 18-34 through music, urban lifestyle, gaming and comedy." Certainly, the sophomoric and raunchy language and drug images in "Tiny Entourage" are designed to appeal to male teens more than to grownups.

The Sparks ads fall far short of one of the basic principles of the Beer Institute's Advertising and Marketing Code ("Brewers should adhere to contemporary standards of good taste applicable to all commercial advertising ...."). Sparks advertising also directly violates provision 5a of the Beer Institute's Advertising and Marketing Code:

[Beer advertising and marketing materials] should not contain language or images that are lewd and indecent in the context presented and the medium in which the material appears.

The "Tiny Entourage: Hot Tub Cougar Action" video includes terms such as "fuck," "blow job," "hold your dick," and "fat whore," and images of explicit sex.

Other videos on the site, also sponsored by Sparks, present edgy, juvenile humor and music, including cartoons clearly attractive to teenagers. The Sparks ads adjacent to the video screen also have a decidedly teenage appeal. They read, in multi-colored, irregular block letters: "INGREDIENTS: ALCOHOL + CAFFEINE + MAKE THAT PARTY WORK + SURROUNDED BY HOTTIES + VICTORY DANCE + CHECK THIS OUT = [image of Sparks can].COM" and "ALCOHOL + CAFFEINE + DOWN FOR WHATEVER.= [image of crushed Sparks can].COM."

The title above one screen featuring six young faces with Sparks "blindfolds" and orange tongues, seemingly printed by hand on masking tape attached to the image, reads: "ALCOHOL + CAFFEINE + DOWN FOR WHATEVER = SPARKS." Each character apparently has a can of Sparks in hand.

The Federal Trade Commission, in its September 2008 report, "Self-Regulation in the Alcohol Industry," reiterated its admonition that alcohol producers avoid online content that is likely to appeal to minors and called on alcohol marketers to consider instituting age verification, rather than simple screening mechanisms to help block underage access to those sites. Neither the Sparks web site nor www.heavy.com makes any effort to avoid online content that is likely to appeal to minors.

MillerCoors has reached new depths of irresponsibility in its marketing of caffeinated alcoholic beverages that put young people at risk for serious health and safety problems. We call on you to act immediately to clean up advertising for Sparks and, as CSPI's lawsuit against your company asks, pull these harmful products off the market.

Sincerely,

George A. Hacker

Director

Alcohol Policies Project

cc Beer Institute

Federal Trade Commission
MolsonCoors Brewing Co. Board of Directors
Graham Mackay, CEO SABMiller
SABMiller Board of Directors
National Association of Attorneys General Special Committee on Youth Access to Alcohol
WHO