

CCRB 2007 ANNUAL REPORT

CODE
COMPLIANCE
REVIEW
BOARD



BEER INSTITUTE

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Beer Institute Code Compliance Review Board

January 21, 2008

Mr. Jeff Becker
President
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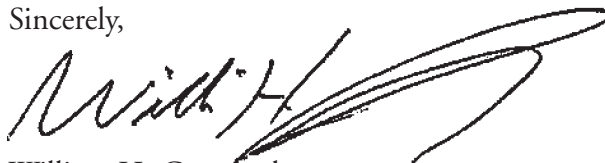
Dear Mr. Becker:

I am pleased to share with you the Code Compliance Review Board's (CCRB) second annual report detailing our work completed throughout 2007. This year we received and deliberated on four cases, summaries of which are included in our report. With the completion of a second successful year, we have also helped create a strong framework for fairly and comprehensively addressing complaints about brewer advertising that implicate the Beer Institute Advertising and Marketing Code.

The Board has also been updated on the recently developed buying guidelines for brewer advertisements placed on web sites and in newspapers and various policy issues related to self-regulation in advertising.

Thank you for your continued support of our efforts to ensure advertising of brewers and beer importers is consistent with the Beer Institute's Advertising and Marketing Code. My colleagues and I on the CCRB look forward to continuing our work with you in the coming year.

Sincerely,



William H. Cunningham
Chairman

CCRB Members



William Cunningham, PhD, who is serving as the Chairman, is a professor of Marketing at the University of Texas at Austin. He served for eight years as Chancellor and Chief Executive Officer of the University of Texas System. In addition to his extensive background in higher education, Dr. Cunningham has a longstanding academic interest in consumer protection issues. He serves as a board member and advisor to several major corporations and non-profit organizations.



Rory Davies serves on the Commission on Presidential Debates. Her responsibilities include producing the U.S. presidential debates, as well as providing technical assistance to countries worldwide about issue-oriented candidate debates. She has previously served as Executive Vice President of the National Association of Broadcasters (NAB) and on the national board of Mothers Against Drunk Driving. Ms. Davies developed and oversaw NAB's national public service campaigns, including initiatives to combat underage drinking and drunk driving.



Gloria Rodriguez is the founder, president, and CEO of Comunicad, a national public relations, advertising, and marketing communications firm recognized for its expertise in the growing Hispanic markets. Rodriguez is a founding board member and past chairwoman of the National Hispana Leadership Institute, a national training institute for Hispanic women, which works in coordination with Harvard University and the Center for Creative Leadership. She is a founding member of the Board of Directors of the National Latino Children's Institute, which she chaired from 2002-2004.



Paul G. Summers is a partner with the law firm Waller, Lansden, Dortch & Davis. Prior to joining the firm, he served as Attorney General of the State of Tennessee, Judge of the Tennessee Court of Criminal Appeals, and District Attorney General for a multi-county district in Tennessee. Mr. Summer served as a JAG officer for more than three decades in the U.S. military, retiring with the rank of colonel. He was awarded the Legion of Merit by President George W. Bush and is a member and former Chairman of the Jason Foundation, Inc., a national nonprofit foundation dedicated to the education and prevention of teenage suicide.

Beer Institute Advertising and Marketing Code Complaint Process



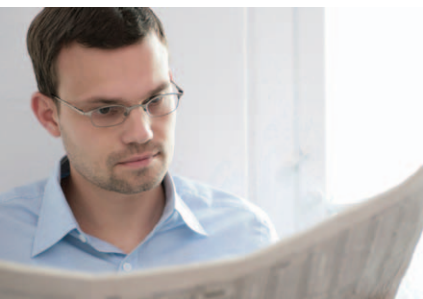
Brewers utilize the Beer Institute Advertising and Marketing Code's guidelines in developing radio, television, internet, print, and other materials to promote their respective brands. A consumer who believes that specific advertising and marketing material is inconsistent with one or more guidelines of the Beer Institute Code may contact the brewer directly regarding their concern or they may contact the Beer Institute. The brewer will normally respond within ten business days.



A consumer who is dissatisfied with a brewer's response to a complaint that its advertising or marketing material violates a guideline in the Beer Institute Code may file a complaint form with the Code Compliance Review Board (CCRB). The CCRB is an independent panel that was established to provide the public with a timely, transparent, and independent complaint review process for brewer advertising and marketing materials that are being broadcast or actively disseminated in the marketplace.



- The Beer Institute Code as well as background on the CCRB, electronic complaint forms, and instructions are all available at www.beerinstitute.org. Hard copy materials may be obtained by calling 1-800-379-2739.
- When a complaint form is filed, it is forwarded to the brewer responsible for the advertising and marketing material. The complaint and a copy of the advertising and marketing material are also forwarded to the Chairman of the CCRB. The Chairman will then select three CCRB members to consider the complaint. Complaints missing essential information are returned to the consumer with an offer to provide assistance if needed.
- The brewer responsible for the advertising and marketing material has an opportunity to respond to the complaint, after which the CCRB reviews all of the material and renders a decision.
- CCRB decisions and any brewer response to the decision are posted on the Beer Institute web site and compiled in an annual report.
- Identical or substantially similar complaints received by the CCRB (same material and same code provision) are acknowledged with notice that the issue is already pending. All consumers who make identical or similar complaints will receive notice of the CCRB decision and any response by the responsible brewer.
- If a brewer notifies the Chairman of the CCRB that it permanently discontinued broadcast or dissemination of the advertising or marketing material at issue more than 30 days prior to receipt of the complaint filed with the CCRB, and that all reasonable efforts have been taken to withdraw the advertisement or marketing material from the marketplace, the CCRB shall so notify the consumer and the matter shall be considered resolved without the need for further CCRB review.



2007 CCRB Complaint Summaries

Michelob Ultra Amber Poison Flowers

Proponent: R. Kovel, Merrick, NY
Brewer: Anheuser-Busch, Inc.
Date: February 14, 2007

Complaint:

The Proponent stated that the ad violates section 2(d) of the code, for portraying illegal activity possibly under the influence of alcohol.



Summary of Board Decision:

The Code Compliance Review Board decided that the “Michelob Ultra Amber - Poison Flowers” ad did not violate section 2(d) of the Beer Institute's Advertising and Marketing Code for two reasons: First, there is no implication that the individual who sent the flowers was consuming beer. Second, the depictions in the ad appear farcical and the theme of the advertisement is “a parody or spoof and is readily identifiable as such.”

But He Has Bud Light

Proponent: R. Goldschmidt, Downers Grove, IL
Brewer: Anheuser-Busch, Inc.
Date: April 18, 2007



Complaint:

The Proponent believed the ad suggested drinking might be occurring while driving and portrayed individuals taking extreme risks to obtain beer. The complaint also questioned placement of the ad on college sports programming in light of the Code's requirement that 70% of viewers must be adults of legal drinking age. The Proponent indicated that the ad violated sections 2, 2(a), and 3(c).

Summary of Board Decision:

The Board found that the ad did not violate the referenced sections of the Code.

“Section 2 states that beer advertising and marketing materials should portray beer in a responsible manner. We believe the advertisement is clearly identifiable as a parody or spoof and, therefore, it does not violate Section 2 of the guidelines.”

Section 2(a) was not violated because “the advertisement in question does not show drinking of any kind. It is correct that the passenger the couple picks up is carrying beer, however, once he enters the vehicle the beer is not seen again.”

Section 3(c) states that beer advertising should be “intended for adult consumers of legal age.” The Board stated that this section was not violated by the ad's placement during a college sports event because “according to 2006 Nielson Media Research, approximately 89 percent of the viewers during the 2006 NCAA Tournament were 21 years and older. The median viewer age for last year's tournament was 47. Assuming this information is correct, we have no reason to believe that the 2007 NCAA Tournament would have been more likely to appeal to a younger audience.”

Bud Light Fist Bump

Proponent: R. Kovel, Merrick, NY
Brewer: Anheuser-Busch, Inc.
Date: August 27, 2007



Complaint:

The Proponent believed the interactions depicted in the commercial were “against the law wherever one lives.” Section 2(d) of the Beer Institute Advertising and Marketing Code states that, “Beer advertising and marketing materials should not portray or imply illegal activity or any kind by an individual prior to, during, or after the individual consumes, purchases, or is served beer, unless the activity is a basic element or feature of a parody or spoof and is readily identifiable as such.”

Summary of Board Decision:

“It is our opinion that the advertisement “Fist Bump or Slapping” does represent humor, parody or satire that is readily identifiable by reasonable adults of legal drinking age and that the activity in the advertisement is a basic element or feature of the parody. Therefore, it is the unanimous position of the Code Compliance Review Board that the “Fist Bump or Slapping” ad does not violate the guidance set out in section 2(d) of the Beer Institute's Advertising and Marketing Code.”

Rock, Paper, Scissors

Proponent: R. Kovel, Merrick, NY
Brewer: Anheuser-Busch, Inc.
Date: August 27, 2007



Complaint:

The Proponent stated that the conduct portrayed in the ad does not comport with the rule that prohibits the portrayal of certain activity in conjunction with beer drinking unless it is a readily identifiable parody or spoof. The proponent believed the advertisement violated section 2(d).

Summary of Board Decision:

The Code Compliance Review Board ruled that the “Rock, Paper, Scissors” advertisement does not violate section 2(d) of the Beer Institute Advertising and Marketing Code because it is readily identifiable as a parody or spoof and the activity depicted is an element of the said parody.

Advertising and Marketing Code

Introduction

Beer is a legal beverage meant to be consumed responsibly. Its origins are ancient, and it has held a respected position in nearly every culture and society since the dawn of recorded history.

In the United States, beer is a mature product category with broad cultural acceptance and a history of memorable and distinctive advertising, that because of its humor and creativity, has long been a favorite among American adult consumers. Advertising and marketing materials are legitimate efforts by brewers to inform consumers of the particular styles and attributes of numerous beers and other malt beverages that are available. Brewer advertising and marketing also foster competition, persuade adult consumers of legal drinking age to try particular brands, and maintain customer loyalty.

Brewers should employ the perspective of the reasonable adult consumer of legal drinking age in advertising and marketing their products, and should be guided by the following basic principles, which have long been reflected in the policies of the brewing industry and continue to underlie this Code:

- Beer advertising should not suggest directly or indirectly that any of the laws applicable to the sale and consumption of beer should not be complied with.
- Brewers should adhere to contemporary standards of good taste applicable to all commercial advertising and consistent with the medium or context in which the advertising appears.
- Advertising themes, creative aspects, and placements should reflect the fact that brewers are responsible corporate citizens.
- Brewers strongly oppose abuse or inappropriate consumption of their products.

The term “beer” as used in this Code, covers all types of malt beverages including, but not limited to, beers, ales, porters, stouts, flavored malt beverages, and various specialty products. The production, distribution, and sale of beer in the United States are subject to extensive laws and regulations, enforced by federal, state, and local governments. Federal and state laws establish a three-tiered distribution system for beer. The first tier is composed of brewers and beer importers, which are referenced throughout this Code as “brewers.” The second tier is made up of wholesale distributors, and the third tier includes a wide range of licensed retail outlets, at which beer is sold to consumers. Companies in each tier of this distribution system are required by law to maintain their commercial independence. The Beer Institute encourages all with whom brewers do business to adhere to the law, as well as this voluntary Advertising and Marketing Code.

Guidelines

1. These guidelines apply to all brewer advertising and marketing materials, including Internet and cyberspace media. In applying these guidelines, creative elements are to be considered in the overall context of the advertisement or marketing materials. Humor, parody, satire, and all other advertising themes and devices should be readily identifiable as such by reasonable adults of legal drinking age.

These guidelines do not apply to educational materials or televised, printed, or audio messages of a non-brand specific nature; nor to materials or messages designed specifically to address issues of alcohol awareness, abuse, drunk driving, underage drinking, or over-consumption.

2. Beer advertising and marketing materials should portray beer in a responsible manner:
 - a. Beer advertising and marketing materials should not portray, encourage, or condone drunk driving.

- b. Although beer advertising and marketing materials may show beer being consumed (where permitted by media standards), advertising and marketing materials should not depict situations where beer is being consumed rapidly, excessively, involuntarily, as part of a drinking game, or as a result of a dare.
 - c. Beer advertising and marketing materials should not portray persons lacking control over their behavior, movement, or speech as a result of consuming beer or in any way suggest that such conduct is acceptable.
 - d. Beer advertising and marketing materials should not portray or imply illegal activity of any kind by an individual prior to, during, or after the individual consumes, purchases, or is served beer, unless the portrayal or implication of illegal activity is a basic element or feature of a parody or spoof and is readily identifiable as such.
 - e. Beer advertising and marketing materials should not portray beer drinking before or during activities, which for safety reasons, require a high degree of alertness or coordination.
 - f. Retail outlets where beer is served or sold portrayed in advertising should not be depicted as unkempt or unmanaged.
3. Brewers are committed to a policy and practice of responsible advertising and marketing. As a part of this philosophy, beer advertising and marketing materials are intended for adult consumers of legal drinking age. Advertising or marketing materials should avoid elements that appeal primarily to persons under the legal drinking age. Advertising and marketing materials appeal primarily to persons under the legal drinking age if they have special attractiveness to such persons beyond their general attractiveness for persons above the legal drinking age.
- a. In considering whether beer advertising and marketing materials appeal primarily to persons under the legal drinking age, brewers should take into account the following elements among others:
 - Symbols
 - Language
 - Music
 - Gestures
 - Entertainers or celebrities
 - Cartoon characters
 - Groups or organizations
 - b. Beer advertising and marketing materials should not depict Santa Claus.
 - c. Beer advertising and marketing materials shall only be placed in magazines, on television, or on radio where at least 70% of the audience is expected to be adults of legal drinking age. A placement will be considered reasonable if the audience composition data reviewed prior to placement met the percentages set forth above. What constitutes a reasonable basis for placement depends on the medium and available data for that medium. Buying guidelines for the implementation of this section will be distributed in conformance with the dissemination provisions of this code. The brewer placing advertising or marketing materials in magazines, on television, or on radio shall conduct periodic after-the-fact audits, at least semi-annually where possible, of substantially all of its placements. If a brewer learns that a placement did not meet the Code standard, it will take steps to prevent a reoccurrence. These steps may include, but are not limited to: investigating exceptions; canceling placements on programs with unacceptable audience composition; reallocating purchases to a different and acceptable time slot; contacting the media outlet/station with regard to placement errors or possible reporting errors; reemphasizing audience composition requirements with media buyers and media outlets; and continued monitoring of a program or time slot to determine whether buys should be canceled or reallocated.

- d. Models and actors employed to appear in beer advertising and marketing materials should be a minimum of 25 years old, substantiated by proper identification, and should reasonably appear to be over 21 years of age.
 - e. Beer should not be advertised or marketed at any event where most of the audience is reasonably expected to be below the legal drinking age. This guideline does not prevent brewers from erecting advertising and marketing materials at or near facilities that are used primarily for adult-oriented events, but which occasionally may be used for an event where most attendees are under age 21.
 - f. No beer identification, including logos, trademarks, or names should be used or licensed for use on clothing, toys, games or game equipment, or other materials intended for use primarily by persons below the legal drinking age.
 - g. Brewers recognize that parents play a significant role in educating their children about the legal and responsible use of alcohol and may wish to prevent their children from accessing Internet web sites without parental supervision. To facilitate this exercise of parental responsibility, Beer Institute will provide to manufacturers of parent control software the names and web site addresses of all member-company web sites. Additionally, brewers will require disclosure of a viewer's date of birth at the entry to their websites and will post reminders at appropriate locations in their web site indicating that brewer products are intended only for those of legal purchase age. These locations include entrance into the web site, purchase points within the web site, and access into adult-oriented locations within the web site, such as virtual bars.
4. Beer advertising and marketing materials should not make the following exaggerated product representations:
- a. Beer advertising and marketing materials should not convey the impression that a beer has special or unique qualities if in fact it does not.
 - b. Beer advertising and marketing materials should make no scientifically unsubstantiated health claims.
 - c. Beer advertising and marketing materials may portray beer as a part of personal and social interactions and experiences, and a brand may be portrayed in appropriate surroundings, as a superior choice to compliment a particular occasion or activity. Beer advertising and marketing materials should not, however, claim or represent that individuals cannot obtain social, professional, educational, athletic, or financial success or status without beer consumption.
 - d. Beer advertising or marketing materials should not claim or represent that individuals cannot solve social, personal, or physical problems without beer consumption
5. Beer advertising and marketing materials:
- a. Should not contain language or images that are lewd or indecent in the context presented and the medium in which the material appears.
 - b. May contain romantic or flirtatious interactions but should not portray sexually explicit activity as a result of consuming beer.
6. Beer advertising and marketing materials should not contain graphic nudity.
7. Beer advertising and marketing materials should not employ religion or religious themes.
8. Beer advertising and marketing materials should not disparage competing beers.

- a. Comparisons or claims distinguishing competing beers should be factual.
 - b. Beer advertising and marketing materials should never suggest that competing beers contain objectionable additives or ingredients.
9. Beer advertising and marketing materials should not disparage anti-littering and recycling efforts. Beer advertising and marketing materials should not show littering or otherwise improper disposal of beer containers, unless the scenes are used clearly to promote anti-littering and/or recycling.

10. College marketing

Beer advertising and marketing materials on college and university campuses, or in college-owned media, should not portray consumption of beer as being important to education, nor shall advertising directly or indirectly degrade studying. Beer may be advertised and marketed on college campuses or at college-sponsored events only when permitted by appropriate college policy.

- a. On-campus promotions/sponsorships
 - 1) Brewer sponsored events: Brewer sponsorship of on-campus events or promotions at on-campus licensed retail establishments shall be limited to events conducted in accord with this Code, state law, and applicable institutional policies. In their content and implementation, company on-campus promotions and sponsorships shall not encourage the irresponsible, excessive, underage, or otherwise illegal consumption of beer.
 - 2) Branded products: Beer-branded promotional products such as key chains, clothing, posters, or other tangible goods designed to promote specific beer brands, are intended only for adults of legal drinking age. Distribution of these items will

therefore take place only at licensed retail establishments or where distribution is limited to those over the legal drinking age, and otherwise conforms to applicable laws and institutional policies.

- 3) Tastings: Tasting events at which product samples are provided should occur at licensed retail establishments or where distribution is limited to those over the legal drinking age, or otherwise conforms to applicable laws and institutional policies.

- b. Brewer sales representatives.

Brewer sales representatives who undertake sales calls on or near a college campus must be adults of legal drinking age, and shall conduct sales activities in conformity with this Code.

11. Billboards

Billboard advertisements by brewers shall be located at least 500 linear feet from established and conspicuously identified elementary or secondary schools, places of worship, or public playgrounds.

12. Product placement

Movies and television programs frequently portray consumption of beer and related signage and props in their productions. Brewers encourage producers to seek approval before using their products, signage, or other props in artistic productions. While producers sometimes seek prior approval from brewers, the final artistic and editorial decisions concerning product portrayal are always within the exclusive control of the movie or television producers.

With regard to those producers who seek brewer approval or those brewers who seek placement opportunities, product placement will be guided by the following principles:

- a. Case by Case Approval: Brewers will approve or reject product placement in specific projects or scenes on a case by case basis, based upon the information provided by the movie or television program's producers.
- b. Portrayal of drinking and driving: Brewers discourage the illegal or irresponsible consumption of their products in connection with driving. Consistent with that philosophy, brewers will not approve product placement where the characters engage in illegal or irresponsible consumption of their products in connection with driving.
- c. Underage drinking: Brewers discourage underage drinking and do not intend for their products to be purchased or consumed illegally by people below the legal drinking age. Consistent with that philosophy, brewers will not approve product placement which portrays purchase or consumption of their products by persons who are under the legal drinking age.
- d. Primary appeal to persons below the legal drinking age: Brewers discourage underage drinking and do not intend for their products to be purchased or consumed illegally. Consistent with that philosophy, brewers will not approve product placement where the primary character(s) are under the legal drinking age or the primary theme(s) are, because of their content or presentation, specially attractive to persons below the legal drinking age beyond the general attractiveness such themes have for persons above the legal drinking age.
- e. Portraying alcoholism/alcohol abuse: Brewers do not want their products to be abused. Consistent with that philosophy, brewers will not approve product placement where characters use their products irresponsibly or abusively or where alcoholism is portrayed, unless the depiction supports a responsible-use message.
- f. Measured media: Brewers will not request or approve a product placement in any measured media unless the placement is consistent with the Buying Guidelines that accompany this Code and at least 70% of the audience is reasonably expected to be adults of legal drinking age.

Code Compliance and Dissemination

Each member of the Beer Institute is committed to the philosophy of the Code and is committed to compliance with the Code. When the Beer Institute receives complaints that an advertisement or marketing practice is inconsistent with a provision of the Code, the Institute's longstanding practice is to promptly refer such complaints in writing to the member company or to non-member brewers for review and a response. To facilitate this process, the Beer Institute maintains a toll-free number (1-800-379-2739) and a web site at www.beerinstitute.org.

If the proponent of a complaint is dissatisfied with the response received from a Beer Institute member or a non-member brewer, further consideration may be requested by the Beer Institute Code Compliance Review Board. The Board is composed of individuals with a variety of experience who are independent of the brewing industry. The Board will review complaints from the perspective of the reasonable adult consumer of legal drinking age and decide whether or not such complaints identify advertisement(s) or marketing material(s) that are inconsistent with one or more of the guidelines in the Code. Board decisions will be posted on the Beer Institute web site.

Copies of this code shall continue to be given to brewery employees, wholesale distributors, and outside agencies whose responsibilities include advertising and marketing beer, as well as to any outside party who might request it.

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Buying Guidelines for the Implementation of Section 3(c) of the Beer Institute Advertising and Marketing Code

Brewers shall use the following guidelines when purchasing advertising in magazines or on television or radio.

Magazine Guidelines

- A. For the purchase of print advertisements in magazines, use of a nationally recognized measurement service providing age 12-plus audience composition data to the extent available, or if not available, age 18-plus audience compositional data, or, if unmeasured, subscription data and/or other data from comparable publications.
- B. For the purchase of print advertisements in new magazines, use of subscription data and/or other data from comparable publications.
- C. A placement will be considered appropriate when data supplied by the sources referenced in (A) and (B) above shows that the publication is in compliance with the code.
- D. Placement of print advertisements in editions of magazines that are published for subscribers 21 years of age or older will be deemed compliant with the Code.

Television Guidelines

- A. For national network television advertising buys, use of national audience composition data on the program in the timeslot.
- B. For syndicated, cable or local spot television buys, use of national audience composition data for the program or daypart being bought.
- C. For new buys, use of national audience composition data for comparable programs in comparable timeslots.

D. A placement will be considered appropriate when data for two consecutive rating periods shows that the program or daypart is in compliance with the Code.

Radio Buying Guidelines

- A. Audience composition restrictions apply to all paid and bonus spots including rotators, negotiated and agreed upon mentions, liners, tags, billboards, and any other type of announcement.
- B. For audited radio stations, audience composition will be determined by the Average Quarter Hour (AQH) Persons measurement in Arbitron quarterly reports.
- C. Time periods in which radio spots may be placed shall be in the following Arbitron standard dayparts or other time periods as specified below that satisfy the code provision that 70% of the audience composition is 21 years of age or older:

1. Arbitron standard dayparts:

i. AM Drive	Monday thru Friday	6:00 a.m. - 10:00 a.m.
ii. Midday	Monday thru Friday	10:00 a.m. - 3:00 p.m.
iii. PM Drive	Monday thru Friday	3:00 p.m. - 7:00 p.m.
iv. Evening	Monday thru Friday	7:00 p.m. - 12:00 midnight
v. Monday through Friday		12:00 midnight - 6:00 a.m.
vi. Sat. & Sun.		6:00 a.m. - 10:00 a.m.
vii. Sat. & Sun.		10:00 a.m. - 3:00 p.m.
viii. Sat. & Sun.		3:00 p.m. - 7:00 p.m.
ix. Sat. & Sun.		7:00 p.m. - 12:00 midnight
x. Sat. & Sun.		12:00 midnight - 6:00 a.m.

2. Any period of time adjacent to an Arbitron standard daypart that is also purchased, provided that each additional hour independently satisfies the code provision that 70% of the audience composition is 21 years of age or older.
 3. Any period of two or more consecutive hours, provided that each hour independently satisfies the code provision that 70% of the audience composition is 21 years of age or older.
- D. Radio spots placed will be considered appropriate when data for each rating period covering the previous six months from the day the ad placement is made shows that the time period purchased satisfies the code provision that 70% of the audience composition is 21 years of age or older.
 - E. As new Arbitron reports become available during the term of an agreement to purchase future radio spots, brewers will review the new data to determine whether spots purchased under the agreement continue to satisfy the Code provision that 70% of the audience composition is 21 years of age or older. If not, brewers will, as soon as practicable, make schedule adjustments, cancellations, or other appropriate changes to comply with the “70% standard” for the duration of the agreement.
 - F. For unaudited radio stations, radio spots placed will be considered appropriate if they meet these guidelines through use of audience compositional data from time periods for comparable stations in comparable markets.
- B. Prior to the purchase of print advertisements in newspapers distributed nationally, regionally or locally, brewers will review audience composition data utilizing an audience measurement source recognized by the advertising industry (such as, but not limited to Scarborough Research and Mediamark Research, Inc.). Data for the most recent rating period available will be reviewed to determine that placements are reasonably expected to meet the demographic standard.
 - C. For advertising placements in unmeasured newspapers, brewers will use subscription data and/or other data from comparable newspapers.
 - D. For advertising placements in new newspapers, brewers will use subscription data and/or other data from comparable publications.
 - E. A placement will be considered appropriate when data supplied by the sources referenced in (B), (C), or (D) above shows that the readership or subscriber base of the newspaper is reasonably expected to meet the demographic standard.
 - F. Brewers will conduct post-audits of a representative sample of actual placements in measured newspapers at least annually to determine whether they met the demographic standard in Guideline 3c of the Code. For newspapers that are not measured on a regular basis, brewers should make reasonable efforts to obtain survey or other information that is available.

Newspaper Buying Guidelines

- A. The demographic standard found in Guideline 3c of the Code applies to all paid and bonus placements in the print editions of daily, Sunday, and weekly newspapers including advertising supplements, magazine sections, and other forms of advertising added to or delivered with newspapers.

Internet Buying Guidelines

- A. The demographic standard in Guideline 3c of the Code applies to all paid and bonus placements by brewers on internet websites operated by others. Where a single purchase is made for placements on multiple websites, the demographic standard and these guidelines apply to each website independently.

- B. It is recognized that methodologies for rating internet websites as well as specific measurements of the various forms of Internet advertising are still evolving. Brewers will utilize a consistent internet audience measurement source recognized by the advertising industry (such as, but not limited to, ComScore or Nielsen NetRatings) to determine whether advertising placements on websites are reasonably expected to meet the demographic standard in Guideline 3c of the Code. When the source regularly used by a brewer does not measure a particular site, other recognized rating systems may be relied upon.
- C. For measured websites, a placement will be considered appropriate if the audience of monthly unique visitors meets or exceeds the demographic standard in Guideline 3c in each of the two most recent, consecutive monthly reports available at the time the placement is purchased.
- D. If a placement is made on a website where the dissemination of such placement is restricted only to registered users of that site age 21 or over, such placements will be deemed compliant with the demographic standard, even if the overall audience for the unrestricted content on the website does not meet the standard.
- E. For new or unmeasured web sites, placements may be made using audience composition data for measured websites in the same category and with similar content and/or by taking other reasonable measures to predict audience composition. Such steps include, for example, reviewing website content and information on the purpose and target audience of the website prior to purchase of advertising and obtaining confirmation from the website operator that its internal data indicates that the website meets the demographic standard.
- F. Downloaded content and content that can be forwarded to others by e-mail directly from brewer websites or from brewer placements on websites operated by others shall include a term of use instructing those downloading or e-mailing such content that they should not forward the content to persons under the legal drinking age.
- G. Brewers will conduct post-audits of actual placements on measured web sites at least twice a year to determine whether they met the demographic standard found in Guideline 3c.



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