



February 24, 2016

Roger Goodell, Commissioner
National Football League
345 Park Avenue
New York, NY, 10154

Dear Commissioner Goodell,

In conjunction with the Campaign for a Commercial-Free Childhood (CCFC) we are writing to request that the National Football League (NFL) stop marketing fantasy football to children through your NFL Rush Fantasy contest. There is evidence that playing fantasy sports can lead to gambling addiction. It is disturbing that the NFL encourages children as young as six years old to engage in this adult activity.

While the Unlawful Internet Gaming Enforcement Act (UIGEA) provides a limited exemption for some fantasy sports contests, other Federal and state gambling laws may still apply. As of today 12 states have declared fantasy sports meet their definitions of gambling and are therefore prohibited unless legalized. And none have regulated fantasy sports. Regardless of the legislative and legal debates, fantasy sports contests that include an entry fee, chance and monetary prizes meet practical definitions of gambling. Fantasy sports players who become preoccupied, are unable to stick to limits of time and money and therefore suffer harm to their emotional or financial health may meet gambling addiction criteria.

Our concerns about gambling problems among DFS players are based on five major areas:

- **Player Demographics:** Fantasy sports players are frequently described as predominantly young, male, sports enthusiasts and likely to gamble. Each of these groups is known to be at higher risk for gambling addiction.
- **Game Characteristics:** Game characteristics associated with higher risk for addiction are high frequency of contests, large number of entries per contest, high entry fees, larger and more frequent payouts.
- **Scientific Research:** The few published studies to date show that daily fantasy sports players are more likely to have gambling problems than non-players. Problem gamblers in America consistently report they began gambling at very young ages—10 years old for boys—and early participation in gambling is a risk factor for developing gambling addiction.
- **Recovering Problem Gamblers:** Gamblers Anonymous, the self-help fellowship for problem gamblers, recently added fantasy sports to the list of activities it defines as gambling. They urge individuals in recovery to avoid fantasy sports due to the risk of triggering or exacerbating a gambling addiction.
- **Cases:** Actual cases of fantasy sports players with severe gambling problems stemming from their daily fantasy participation have been documented by gambling counselors and reported in national media.

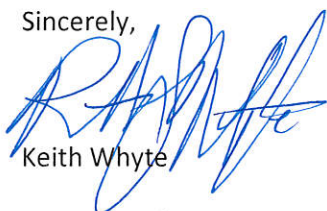
Despite the concerns outlined above about fantasy sports and problem gambling, the NFL operates and has aggressively marketed a platform for young children aged six to twelve, to play fantasy football on the league's NFL Rush fantasy website and apps. CCFC provided ample information on this contest in their January 2015 Out of Bounds report. Promotion saturated the NFL Rush webpage and app as well as SiKids.com throughout the 2015-2016 football season. The advertising featured young children and frequent exhortations to play for the chance to win prizes.

While no entry fees are required, valuable prizes are awarded. Of particular concern is the \$5,000 cash (called a "scholarship") prize and the Pro Bowl trip valued at more than \$10,000. The high value of the prizes may send a message to children that playing fantasy sports is a good way to earn money for education. Even worse, it may encourage children to spend excessive amounts of time trying to win these prizes, thus planting the seeds of addiction. It is inappropriate that the NFL has operated and aggressively marketed fantasy football to children as young as six years old, including through an accompanying school curriculum.

NCPG's mission is to lead state and national stakeholders in the development of comprehensive policy and programs for all those affected by problem gambling. Our purpose is to serve as the national advocate for programs and services to assist problem gamblers and their families with the vision to improve health and wellness by reducing the personal, social and economic costs of problem gambling. Over the years we have worked with NFL Security and Player Engagement on a number of programs including the Sports Wagering Summit. Protecting the integrity of the Shield, preventing gambling addiction among players and personnel and protecting health of fans and their families was always of paramount concern for the League. As NFL is a member of NCPG we reached out directly with the concerns expressed above. We were gratified that significant changes were subsequently made to the NFL Rush pages. We note that as of today, neither the NFL Rush nor the SIKIDS website displays any prominent promotion of the fantasy football game. We hope the NFL will confirm that it will not operate or promote fantasy football games for children at any time in the future.

We welcome the opportunity to meet with you to further discuss our concerns.

Sincerely,



Keith Whyte

Executive Director