

Social Media: Issues on the Horizon

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FDA/Pharmaceuticals / Washington, D.C.



Issues deserving attention

- Viral Marketing
- Print-rule Traps
- Behavioral Marketing

Viral Marketing

- Marketing techniques that use pre-existing social networks to produce increases in brand awareness or to achieve other marketing objectives through self-replicating viral processes.

(http://en.wikipedia.org/wiki/Viral_marketing. Accessed October 7, 2010)

- Concept is that consumers will spread positive messages about products without manufacturer involvement
 - Examples include all forms of social media, e.g. video clips, interactive flash games, images, twitter, Facebook, MySpace

Viral Marketing Pitfalls

- Pitfalls
 - Lack of Control
 - Forward button, Comments
 - There are many examples of well-known spoofs of corporations, e.g. lost luggage on United Airlines (+9.3M YouTube views to date)
 - Pfizer “Transformation” Laid Me Off (+25K YouTube views) – regarding closure of Ann Arbor facility
 - “birthplace of the best selling drug in the world”
- Many commercials posted to YouTube also have a corresponding “ad spoof”
- Most are rarely viewed

Viral Marketing in Rx Drug World

- Bayer in a partnership with Mom Central hosted live presentations for “busy moms” through in-home parties where women could talk about Mirena, an interuterine contraceptive device
- A Mom Central representative and a nurse practitioner received suggested scripts for running the party
 - ***Barb will begin presentation with an icebreaker-an interactive Q&A- which will touch upon issues such as busy schedules, barriers to intimacy and contraception.***
- At the end of the party, attendees received a Mirena Q&A brochure, patient information, and were asked to fill out a confidential questionnaire regarding their impressions of the party and Mirena

DDMAC Letter to Bayer

- December 30, 2009 NOV to Bayer Healthcare: The “live consumer-directed program” misbranded Mirena:
 - the party script overstated the efficacy of Mirena
 - presented unsubstantiated claims, and
 - minimized the risks by failing to discuss the inability of an IUD to prevent the spread of HIV

Company-Sponsored Viral Marketing

- Facebook “share function”:
 - Allows a user to post to a Facebook profile shareable content from other sites. Once posted, the shared content is posted on News Feeds (appearing on friend’s pages) and Facebook friends can comment on the post, share it further, etc.
- Novartis allowed a share function on its Tasigna webpage
- When shared, it appeared as “CML (chronic myeloid leukemia) – find out if Tasigna (nilotinib) is right for you” with a link to the website and a brief description of the indication
 - some variations on this such as “talking to your doctor can help you...”
“more information to support your patients...”
 - all linked to Novartis-generated content, including full ISI

DDMAC NOV to Novartis, July 29, 2010

- The share widget itself
 - omitted all risk information
 - “particularly concerning” given the black box and REMS program that is not mitigated through a link to the ISI
 - inadequately represents the indication
 - misleadingly implies drug can treat all types of CML
 - implies superiority to other drugs, e.g. “next generation” treatment
- The ability to comment on the shared widget was not at issue. DDMAC seems to acknowledge that Novartis was not responsible for comments added to the shared content

Behavioral Targeting

- Use of information collected on an individual's web-browsing behavior, such as pages they have visited or searches they have made, to select the advertisements to display to that individual.
(http://en.wikipedia.org/wiki/Behavioral_targeting. Accessed October 7, 2010)
- Wall Street Journal Article ran in early August regarding the privacy issues surrounding behavioral targeting.
 - Subsequently, Members of Congress issued letters to internet advertising companies asking how they use personal financial and health care information in behavioral advertising

Behavioral Targeting (Non-Rx)

- On October 5, 2010, we spent 16 minutes browsing for sectional sofas on Overstock.com, including clicks through to details around specific products and customer reviews. We printed information on two sofas and left the website.
- Half an hour later, ads for Overstock.com sectional sofas appeared on the right-hand side of the screen when viewing the Yahoo! news page.
- Two days later, Overstock.com ads for the sectional sofas we had clicked on appeared in a www.hotmail.com e-mail inbox

Behavioral Targeting (Non-Rx)

http://co102w.col102.mail.live.com/default.aspx?wa=wsignin1.0

View Favorites Tools Help

ois basic skills requirements Search Share Sidewiki Check AutoFill Illinois basic Sign In

CL FI W KC

Chat from your inbox See which Messenger friends are online and send an IM from Hotmail. (Look for your friend list under your folders.)


Inbox

Search e-mail bing

View: All | Unread | From contacts | Social updates | From groups | Everything else < Arrange by >

<input type="checkbox"/>	JCPenney	Liz Claiborne NOW, Exclusively At JCPenney	4:59 AM	
<input type="checkbox"/>	JCPenney	ANNE, 5 Hours Only! Get An EXTRA 15% Or 20% Off Any Purchase	10/05/10	
<input type="checkbox"/>	Busey Customer Supp...	Introducing Debits2Dollars from Busey Bank	10/04/10	
<input type="checkbox"/>	JCPenney	Free Shipping + 30-60% Off At America's Biggest Window & Home ...	10/03/10	
<input type="checkbox"/>	JCPenney	BIG Store Savings-Enjoy Sale Prices Through Wednesday!	9/30/10	
<input type="checkbox"/>	Busey Customer Supp...	Last opportunity to get \$20 back.	9/29/10	
<input type="checkbox"/>	Walgreens	Special Anniversary Sale! \$10 off \$40 or More + Pick Your Photo Pri...	9/29/10	
<input type="checkbox"/>	JCPenney	BIG Store Savings-Enjoy Sale Prices Through Wednesday!	9/26/10	
<input type="checkbox"/>	JCPenney	It's BIG! Shop The Big One Day Sale	9/23/10	
<input type="checkbox"/>	Busey Customer Supp...	Introducing Debits2Dollars from Busey Bank	9/22/10	
<input type="checkbox"/>	Busey Customer Supp...	New Free Busey ebank Service	9/21/10	
<input type="checkbox"/>	JCPenney	Discover Liz Claiborne NOW During Our Fall Sale In Stores!	9/19/10	
<input type="checkbox"/>	Busey Customer Supp...	Pay bills online and get control in minutes.	9/16/10	
<input type="checkbox"/>	JCPenney	Appreciate The Savings In Stores-Coupons, Double Rewards Points ...	9/16/10	
<input type="checkbox"/>	Windows Live Team	Messenger tips - 5 top features	9/16/10	
<input type="checkbox"/>	JCPenney	BIG Store Savings-Enjoy Sale Prices Through Tuesday!	9/12/10	
<input type="checkbox"/>	Busey Customer Supp...	New Free Busey ebank Service	9/11/10	
<input type="checkbox"/>	Pipeline	The fall trend guide: Our 10 favorites.	9/09/10	
<input type="checkbox"/>	JCPenney	Shop BIG Doorbusters This Friday & Saturday!	9/09/10	
<input type="checkbox"/>	JCPenney	Shop 100 Super Hot Buys This Labor Day Weekend!	9/05/10	

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