

**CURTIS1000**

## CORPORATE OFFICE

June 16, 2011

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Federal Trade Commission  
Office of the Secretary  
Room H-113 (Annex W)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Re: Interagency Working Group on Food Marketed to Children: FTC Project No.  
P094513

To Whom It May Concern:

Curtis 1000, a nationwide provider of print and print-related services, is troubled by the federal government's recent proposal to ban large amounts of advertising activity. Absent scientific evidence to justify the need for such a ban, this advertising restriction is arbitrary and Curtis 1000, as a business partner to the food industry, is concerned about the negative effects of adopting these "voluntary" guidelines.

The Interagency Working Group's proposed ban of advertising to children and teens would seem to be an ill-informed attempt to address youth obesity. Although Curtis 1000 believes that child obesity is a very real problem, we have seen no evidence that advertising causes obesity.

The federal agencies' distinction between "good foods" and "bad foods" has no grounding in nutritional research. In fact, many foods that would be affected by the advertising ban are the same foods that the USDA provides to needy families through its WIC (Women, Infants, and Children) program. The so-called nutritional guidelines that the proposal attempts to impose are arbitrary, as demonstrated by their conflict with the FDA's own definition of "healthy."

These contradictions (in addition to the fact that there is no proven linkage between advertising and obesity) raise questions as to whether the Interagency Working Group's proposal is an attempt to assure the public that "something" is being done to combat youth obesity. It is unacceptable for federal agencies to use food companies to scapegoat a societal problem that has grown due to a number of factors, including increasingly sedentary lifestyles. The inherent conflict of the Interagency Working Group's guidelines with existing federal nutritional standards plainly reveals the arbitrary and misguided nature of the proposed advertising ban.

We oppose this inadequate and unjustifiable approach to addressing child obesity – it is rife with contradiction and if implemented, could have seriously negative economic and public health implications for our country.

Respectfully,

Steven C. Geiger  
President