

Advocates of the  
Food Industry  
Since 1900

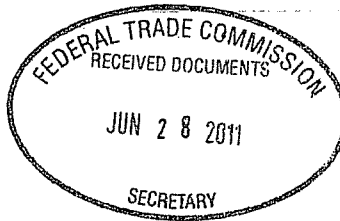


**FOOD INDUSTRY ALLIANCE OF NEW YORK STATE, INC.**

130 Washington Avenue • Albany, New York 12210 • Tel (518) 434-1900 • Fax (518) 434-9962  
Government Relations (518) 434-8144

**ORIGINAL**

June 22, 2011



U.S. Federal Trade Commission  
Office of the Secretary  
Room H-113 (Annex Q)  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

To Whom It May Concern,

As President of the Food Industry Alliance (FIA) of New York State, I am writing to voice my concern and those of my 800 corporate members regarding the proposed voluntary guidelines for advertising and marketing within the food industry. With my members' businesses directly tied to the advertising and marketing discussed by the Interagency Working Group, these stringent rules would effectively tie the hands of grocers in reaching customers.

While the FIA membership and I wholeheartedly support ideas to improve the health and well-being of my customers, we do not believe these "voluntary guidelines" will have any meaningful impact on the health of the public. In fact, many of the foods most affected by these stringent guidelines are lower-calorie, nutrient-dense foods that the government elsewhere has encouraged people to eat. Additionally, this proposal will have a negative impact on the economy and jobs in the retail, food, advertising and media industries.

Furthermore, these restrictions are arbitrary and not based on science, contradict nutrition guidance provided by other federal agencies, and ignore the research of your own agency – the FTC Bureau of Economic Research – that shows that while obesity rates were going up in this country, food advertising was going down.

As New York State's only statewide trade association representing food retailers, FIA is requesting that the federal government further review the impact these broads guidelines would have on a critical sector of our economy --- not only grocery retailers and wholesalers but also industries that work to package, distribute and communicate to consumers.

Again, thank you for your consideration and I strongly urge withdrawal of this proposal.

Sincerely,

James T. Rogers  
President & CEO

*The Food Industry Alliance of New York State is the only statewide trade association representing the interests of New York State's food stores. FIA's 800 corporate members include the full scope of food distribution --- ranging from large supermarket chains to independent grocers, convenience stores, food co-ops and wholesalers as well as grocery manufacturers and suppliers to the industry.*