



May 9, 2011

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

**RE: Request for Extension of Time for Filing Comments, Interagency Working Group on Food Marketed to Children: Proposed Nutrition Principles: FTC Project No. PO9513**

Dear Secretary Clark:

I am writing on behalf of the National Restaurant Association (NRA) to respectfully request a forty-five (45) day extension of time to file comments on the Interagency Working Group's (IWG) Proposed Nutrition Principles to Guide Self Regulatory Efforts, so that comments would be due July 28, 2011.

The National Restaurant Association, founded in 1919, is the leading business association for the restaurant industry, representing more than 380,000 member restaurant establishments. The Association's membership base consists of many different facets of the industry including quick service, casual dining and table service restaurant operators. Thus, some of our members would be directly impacted by the proposed nutrition principles.

The Commission has established a comment deadline of June 13, 2011. We do not believe a 45 day comment period affords NRA or our members adequate time to evaluate and respond to the very important and complex issues raised by the IWG in the preliminary proposal. The Commission seeks over 30 comments on a broad scope of issues such as nutrition principles, marketing definitions, economic consequences, feasibility of reformulations, and competitive implications. Unlike in the proposed standards released in December 2009, the preliminary proposal now includes principles for main dishes and meal products. Our members need time to fully and carefully analyze the effect of the proposed nutrition principles on their menu portfolios. In addition, given the expansive definition of marketing set forth in the preliminary proposal, our members need time to evaluate the impact of this definition.

For the foregoing reasons, NRA respectfully requests that the comment deadline in this proceeding be extended until July 28, 2011. Please feel free to contact me at [jmcglockton@restaurant.org](mailto:jmcglockton@restaurant.org) or 202-331-5931 should you have any questions.

Sincerely,  
Joan Rector McGlockton  
Vice President, Industry Affairs & Food Policy  
National Restaurant Association