



May 11, 2011

**BY ELECTRONIC FILING**

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

Re: Request for an Extension of Time for Filing Comments; Interagency Working Group on Food Marketed to Children: General Comments and Proposed Marketing Definitions; FTC Project No. P094513

Dear Mr. Clark:

The undersigned respectfully submit this letter, which replaces our letter filed yesterday. The undersigned request an additional fifteen (15) days of time for the filing of comments in the above-referenced proceeding. We appreciate the Commission's announcement yesterday to extend the comment period by thirty (30) days. In view of the importance of these issues, we believe that more time is necessary and respectfully request an additional fifteen (15) days, which would set a ninety (90) day period overall.

Our members have been carefully reviewing the "Preliminary Proposed Nutrition Principles to Guide Industry Self-Regulatory Efforts" that the Interagency Working Group on Food Marketed to Children ("Working Group") released on April 28, 2011, as well as the request for comments on the proposal. We look forward to responding to the Working Group's request for comments.

In its request, the Commission stated that comments are due no later than June 13, 2011. The same request identified 30 subjects for parties to consider, ranging from the setting of the nutritional standards, to the classification of marketing activities, to the feasibility of reformulations, to the economic consequences, to the competitive implications of the proposals if adopted. At the same time, the Commission noted the following:

**GROCERY MANUFACTURERS ASSOCIATION**

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[it] is aware of the significant impact the proposal would have on the current marketplace. A significant percentage of the products currently marketed to children would not meet the proposed nutrition principles. Some foods would likely require substantial reformulation.

We therefore respectfully request an extension for the time to comment. We are requesting an additional fifteen (15) days, which would set a ninety (90) day period overall. With this request, we note our concern that three months may not give parties enough time to understand and comment on all the implications the proposal raises. Nonetheless we believe that it is important for the agencies to have meaningful information as soon as stakeholders can provide it, and we recognize that dialog need not cease at the end of comments.

Please feel free to contact us should you have any question about this request or would like to discuss.

Sincerely,

Scott Faber, on behalf of

*Grocery Manufacturers Association  
Association of National Advertisers  
American Bakers Association  
American Beverage Association  
Frozen Potato Products Institute  
Grain Foods Foundation  
International Bottled Water Association  
National Association of Manufacturers  
National Fisheries Institute  
National Frozen Pizza Institute  
National Restaurant Association  
National Yogurt Association  
North American Millers' Association  
Snack Food Association  
Wheat Foods Council*

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