

June 7, 2011

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:

Insignia Systems, Inc. is submitting this Comment to express our significant reservations about a federal proposal that would restrict advertising activity of food companies based on arbitrary criteria that lacks actual scientific evidence.

It had always been our understanding that the Federal Trade Commission's mission was to promote competition in the marketplace. It would seem that central to that mission would be an understanding of the benefits of advertising. If companies cannot advertise their products, they cannot afford to invest in product improvements and deliver innovative products. Many of the products subject to the advertising ban being proposed here are healthful foods that provide important nutrients to American children. If anything, the advertising of these products should be affirmatively encouraged. If people are unaware of the existence of these products — like cereals, soups, and other products that provide meaningful health benefits — these products will disappear from the marketplace, as will the public health benefits they deliver. It is hard to see why this is a desirable result.

Thank you,

Sara Batchelder Insignia Systems, Inc.