



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

Dear Sirs:

Valentine Design is proud to be a business partner with the food industry and is concerned to see the Federal government proposing a ban on the advertising of nearly any food product to children and teens, without any evidence that such a move will help reduce obesity and in spite of considerable evidence that it will harm the economy. We are submitting this Comment to voice our concerns.

The proposal is apparently intended to reduce consumption of food products that will be covered by the advertising ban. But many of those products -- like yogurt, cereal, milk, etc. -- obviously are very important in the promotion of public health. The FDA defines as "healthy" many of the most frequently advertised foods for kids. The U.S Dietary Guidelines actively promote consumption of these same foods. How could these facts be reconciled with the IWG's proposed advertising ban? It is difficult to understand how one could think that banning advertising of healthy foods would be good public policy. This proposal should not move forward.

Respectfully,

Kevin A. McMahon
Vice President