



Cincinnati Indianapolis  
Kansas City New York

June 10, 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:

Sunflower Group recently became aware of the IWG proposal that would ban virtually all food advertising to children and adolescents. At Sunflower Group, we are proud of our relationship with the food industry and are very concerned about this proposed ban. The ban appears to be based on mere conjecture, as opposed to sound scientific and economic data. We cannot ignore the deep irony that surrounds the timing of this proposal. Just recently, the Obama administration announced its plan to re-vamp "outdated regulations that stifle job creation and make our economy less competitive."

It appears that the federal agencies involved in developing the proposed advertising ban have not given any consideration to the negative economic impact these new advertising standards would have on the food industry.

Unwarranted restrictions on advertising will stifle investment in product innovation, which in turn will make American food companies less competitive. This would not only have a direct, negative effect on food companies and the millions of people they employ, but that negative effect would spread to all of the suppliers, vendors and consultants to the food industry, negatively impacting the people they employ.

In the interest of innovation and economic growth, we oppose this intrusion on the rights of food companies to advertise their products.

Sincerely,

Joseph M. Whelan  
Chief Financial Officer

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