



June 13, 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:

Bromley Communications writes to express its strong opposition to the advertising restrictions proposed by this working group of governmental agencies. We are a proud partner of many food brands in the marketing of their products to Hispanic consumers, and so we know firsthand that the food industry does not need these restrictions because they are already marketing responsibly to children. Our company and all of its employees are very concerned that these unnecessary restrictions will have a terrible impact on our business in addition to being a bad public policy of putting the government in the role of parents.

This proposal on the table is not needed. The advertising activities that would no longer be permitting go much further than prohibiting communications directed to kids. The proposed definitions make it almost impossible to even communicate about products (that do not meet this working group's nutritional requirements) to adults, because they are so wide reaching and broad. For example, you could not advertise a product on television to adults even if adults were 80% of the television audience!

These sorts of reasons are why we are concerned that the working group simply does not believe that parents can be relied upon to decide what food they should buy for their families. This is not the role for government, especially since the government has not shown that prohibiting this advertising will actually have any positive effect on childhood obesity. Food companies are committed to marketing responsibly, and this working group's proposed prohibitions will do more harm than good.

Sincerely,

Ernest W. Bromley
Chairman/CEO