

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:

Metro Packaging & Imaging, Inc. is submitting this comment to express its opposition to the federal government's proposed ban on most types of food advertising to children. Metro Packaging & Imaging takes pride in its partnership with the food industry and has grave concerns about the negative impact the proposed advertising ban will have on the industry.

It is imperative that the Federal government consider the negative impact that the proposed advertising restrictions could have on many segments of the U.S. economy. Of course, food companies, and the millions of people they employ, would suffer to the extent sales of their products were harmed by the proposed ban on advertising. Lower sales would inevitably lead to loss of jobs, and in times like these, this country cannot afford to lose more jobs. In addition to this direct negative impact on food companies, there would be collateral economic casualties to the suppliers of goods and services to food companies, which would include our company.

While combating childhood obesity is certainly a worthy goal, there is no evidence that what the government is promoting here will work. To the contrary, all evidence suggests that advertising has no impact on obesity rates, and it is especially hard to see why it would be good public policy to ban the advertising of foods that FDA and USDA promote for consumption in all other Federal dietary guidance. Particularly in these difficult economic times, a thorough economic impact study needs to be conducted before proceeding with a misguided and counter-productive attempt to promote public health and nutrition.

Sincerely,

Armand deTorres President & CEO