

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:

BD&A, Inc. is opposed to the IWG's proposed ban on child advertising. As a long-time business partner of food companies, BD&A is concerned about the negative impact these misguided advertising restrictions would have on our business.

There are many serious questions raised by the proposal – questions that do not appear to have been adequately considered by the Interagency Working Group. One key question is this: how could a ban on advertising foods that the FDA defines as “healthy” make any sense? The fact is that many foods that meet the FDA's definition of “healthy,” and many foods that meet USDA WIC program standards, would be subject to the proposed advertising ban. This makes absolutely no sense as a matter of public policy, and it is reason enough to reject the proposal.

The downstream economic impacts on American businesses make the proposed policy even more concerning. This policy should not be permitted to move forward.