

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:

ePrize is submitting this Comment to express our concerns about the scientific validity and economic impact of the proposed ban on advertising most foods to children and teens. We also have significant concerns about unnecessary and potentially stifling government intervention in commercial affairs.

First of all, there appears to be no scientific support for the notion that banning advertising will reduce childhood obesity. And there certainly would seem to be no reason to ban the advertising of foods that FDA defines as “healthy” and USDA encourages Americans to eat through its U.S. Dietary Guidelines. But that is precisely what is being done. We would appreciate seeing the scientific basis for this dubious policy.

Also, before adopting any type of new regulation, government has an obligation to seriously consider the economic impacts of its decisions. In this case, 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 can ill afford to lose more jobs.

In addition to negatively impacting food companies, one must also consider the collateral damage caused to those who support the food industry - suppliers of goods and services to food companies. Our company is one of those suppliers. Especially during these difficult economic times, a thorough economic impact study must be conducted before proceeding with this misguided and counter-productive attempt to promote public health and nutrition.

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

ePrize, LLC