



**MICHIGAN  
CHAMBER  
OF  
COMMERCE**

**FEDERAL TRADE COMMISSION**

**JUN 27 2011**

**ADVERTISING PRACTICES**

June 16, 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:


On behalf of the Michigan Chamber of Commerce, I am writing to express our deep concern over the proposed advertising restrictions developed by your office in conjunction with other federal agencies. We are concerned these restrictions will not necessarily further the goal of improving the health of our citizens, and at the same time, we are extremely concerned about the impact of this proposal on jobs in Michigan.

The Michigan Chamber is a strong proponent of initiatives to improve the health and wellness of our members and citizens. We are committed to helping address the obesity epidemic and we are specifically working with the Michigan Department of Community Health to share private sector best practices in this area.

However, we strongly disagree with any conclusion that advertising restrictions will have any meaningful impact on the health issues facing our nation. In fact, studies show that the obesity rate in the U.S. increased while food advertising has decreased. These restrictions are not based on science and contradict existing nutritional guidelines provided by other federal agencies.

While we all share the goal of combatting obesity in the United States, this proposal is not the solution. It will negatively impact thousands of jobs across the country by inserting government between the marketplace and the consumer with potentially disastrous consequences. Michigan is home to many industries and companies that will be significantly harmed by this proposal. Our state cannot afford unnecessary regulations that further hinder economic growth and employment. We respectfully ask that you withdraw this proposal.

Sincerely,

 Jim Holcomb  
Senior Vice President, Business Advocacy & Associate General Counsel  
Michigan Chamber of Commerce

cc: Senator Carl Levin  
Senator Debbie Stabenow