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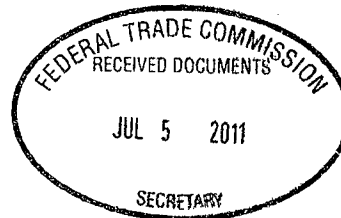
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Acosta Sales & Marketing

Mike Wagstaff
Holiday Oil Company

June 27, 2011

U.S. Federal Trade Commission
Office of the Secretary
Room H-113 (Annex Q)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

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To Whom It May Concern,

The Utah Food Industry Association is an industry trade association that has represented the interest of grocery and convenience store retailers in Utah for over 100 years. Our members operate over 750 retail, manufacturing and distribution centers across the state of Utah and represent over \$5.4 billion in sales annually in the State of Utah. Food and convenience store retailers employ over 46,000 Utah workers.

I am writing to voice our associations concerns regarding the proposed voluntary guidelines for advertising and marketing within the grocery industry. Our members business is directly tied to the advertising and marketing discussed by the Interagency Working Group, these stringent rules would effectively tie our hands in reaching out to customers.

While we whole-heartedly support ideas to improve the health and well being of customers, we do not believe these "voluntary guidelines" will have any meaningful impact on the health of the public. In fact, many of the foods most affected by these stringent guidelines are lower-calorie, nutrient-dense foods that the government elsewhere has encouraged people to eat. This proposal will have a negative impact on the economy and jobs in the retail, food, advertising and media industries.

Furthermore, these restrictions are arbitrary and not based on science, contradict nutrition guidance provided by other federal agencies and ignore the research of your own agency - the FTC Bureau of Economic Research - that shows that while obesity rates were going up in this country, food advertising was going down.

We respectfully request that the federal government further review the impact these broads guidelines would have on a critical sector of our economy; not only grocery retailers and wholesalers but industries that work to package, distribute and work to gain the attention of consumers.

Again, thank you for your consideration and we strongly urge you to withdraw this proposal.

Sincerely,

David M. Davis
President and Chief Legal Counsel