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June 3, 2005

Dockets Management Branch
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Docket No. 2004N-0456: Food Labeling; Serving Sizes

Dear Sir or Madam:

The Juice Products Association is the national trade association for manufacturers of juices and juice products, including jams and jellies, as well as companies that supply these manufacturers. Serving size declaration is very important for consumers of these products, and FDA has raised some very thoughtful questions in that regard in this Advance Notice of Proposed Rulemaking.

As FDA well knows the time required to promulgate regulations implementing the original Nutrition and Labeling Act that set forth labeling of calories was lengthy, including a considerable period for public comment. JPA believes that more than 75 days is required to respond to the level of detail FDA is requesting in the ANPR.

Therefore, JPA respectfully requests a 90-day extension to respond to this ANPR.

Sincerely,

Richard E. Cristol
President

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