



MARTIN'S POTATO CHIPS INC. JAN 14 11:03
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January 7, 2000
FDA Docket Management Branch, HFA-305
Food and Drug Administration
5630 Fishers Lane, room 1061
Rockville, MD 20852

Through various trade publications I have become aware of a proposed rule to require saturated fat content to be marked with a **, and lower in the panel the ** would indicate the quantity of trans fat.

I have several comments about this proposed change:

1. Technical merit is lacking – the science behind the effects/non effects of various the various fatty acids that make up triglycerides is very weak, and subject to "fashionable" change and multiple interpretations.
2. Value to the consumer is low – very, very few people understand organic chemistry and advanced nutritional science. In plain language, this is over everyone's head. I have a B.S. degree in chemical engineering, and I had to pull out Bailey's Industrial oil and fat products book to find and read a definition for trans fat. Ask your friends, does anyone know what trans fat is?
3. Cost to implement will be high – plate changes for all of our items, estimated cost at our company of more than \$25,000, all eventually paid for by the consumer.
4. Confusion: you could have a product labeled for 2.0 g saturated fat with 10.0 g total fat. This product could have an ** after the saturated fat data, leading to a trans fat line that says 3.5 g trans fat. How can that be? Because trans fat is not a subset of saturated fat!
5. Lets walk before we run, much more research and education is required before labeling changes can have any real value to the consumer. Inaccurate or misleading information is far worse than no information.

Thank you for listening.

Sincerely,

Kenneth A. Potter, Jr.
V.P. Operations

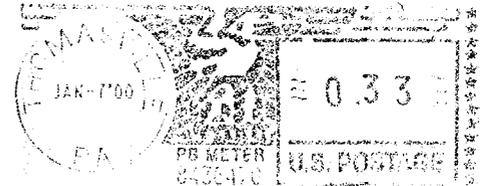
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