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8/19/02



August 19, 2002

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

RE: Docket No. 01N-0548

Dear Food and Drug Administration:

On behalf of the California Avocado Commission (CAC), which represents 6,000 California avocado growers, please accept this follow-up comment to the Proposed Rule titled "Food Labeling; Guidelines for Voluntary Nutrition Labeling of Raw Fruits, Vegetables, and Fish; Identification of the 20 Most Frequently Consumed Raw Fruits, Vegetables, and Fish" published in the March 20, 2002, Federal Register.

*Regarding the label value for TOTAL FAT for California Avocados:*

The Commission is obviously pleased that the USDA data submitted to the Agency as a comment to the Proposed Rule supports our May 28<sup>th</sup> comment that the FDA label value for total fat should be 5 grams per 30 gram serving. By our calculations and statistical analyses, the mean of the eight USDA datapoints is 4.603 grams and the one-sided 95% prediction interval is 4.803 grams total fat per 30 gram serving. Further, a scattergram analysis of the eight new datapoints submitted by USDA lends additional support to our belief that sample 12 should be identified as an outlier for total fat and excluded from statistical analyses.

*Regarding the label value for DIETARY FIBER for California Avocados:*

The Commission would like the Agency to note that Sue Gebhardt at Nutrient Data Laboratory, Agricultural Research Service, USDA had actually requested fiber data from California Avocado Commission. The Commission notes that USDA collected only four fiber datapoints, and understands that the fiber data obtained by USDA were lower than what USDA had anticipated based on past data results and publications. So, per request, CAC provided the same dietary fiber data to USDA on July 29<sup>th</sup> that we had already submitted to FDA for the Voluntary Nutrition Labeling program. The Commission continues to recommend a label value of 2 grams dietary fiber per 30 gram serving.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Affleck", written over a printed name.

Mark E. Affleck  
President/CEO

01N-0548

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