

December 19, 2007

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

REQUEST FOR EXTENSION OF COMMENT PERIOD

RE: [Docket No. 2006N-0168] Food Labeling: Revision of Reference
Values and Mandatory Nutrients; Advance Notice of Proposed Rulemaking
72 FR 62149 (November 2, 2007)

Dear Docket Clerk:

The National Cattlemen's Beef Association (NCBA) appreciates the opportunity to offer comment on [Docket No. 2006N-0168] Food Labeling: Revision of Reference Values and Mandatory Nutrients; Advance Notice of Proposed Rulemaking 72 FR 62149. NCBA is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry. The beef industry has always supported information in the meat case and throughout all grocery aisles that conveys a complete nutrition story and helps consumers make educated purchasing decisions. NCBA supports the proposition of developing a unified educational system, based on the 2005 Dietary Guidelines for Americans and MyPyramid, that includes tools at point of purchase – such as the food label – to help consumers make the best food choices possible.

NCBA respectfully requests that FDA extend the comment period for the docket noted above for an additional ninety days, until April 30, 2008. Extending the comment period to allow a total of 180 days would permit the interested public to respond fully to the questions contained in the Advance Notice of Proposed Rulemaking (ANPRM).

NCBA and its predecessor organizations have been deeply involved with issues related to nutrition labeling since the voluntary program began in 1973; and with issues related to mandatory nutrition labeling and nutrition and health claims with and since the passage of the Nutrition Labeling and Education Act of 1990.

AMERICA'S CATTLE INDUSTRY

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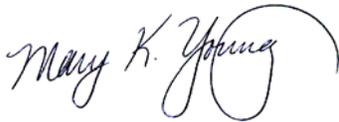
Washington D.C.

Chicago

The issues contained in the ANPRM are quite complex with far reaching implications, thus requiring thorough discussion, deliberation, and modeling to develop responses to questions that will affect the future of required nutrition labeling and the relationship of these regulations to nutrition and health claims. Our industry will use an extended comment period to formulate more comprehensive responses to specific points laid out in the six sections of the notice. These will offer sound data for consideration in the regulatory process that will assist in shaping mandatory labels.

Therefore, NCBA respectfully requests that FDA extend the comment period until April 30, 2008. Additionally, we ask that the Agency act promptly on this request for extension of the comment period, so that all stakeholders can optimize their time in preparing comments to the Agency.

Sincerely,

A handwritten signature in cursive script that reads "Mary K. Young". The signature is written in black ink and is positioned to the left of a vertical red line.

Mary K. Young, M.S., R.D.
Vice President, Nutrition
National Cattlemen's Beef Association

A handwritten signature in cursive script that reads "Phyllis J. Marquitz". The signature is written in black ink.

Phyllis J. Marquitz, MS, RD, JD
Director, Food Policy
National Cattlemen's Beef Association