



**International Dairy Foods Association**  
Milk Industry Foundation  
National Cheese Institute  
International Ice Cream Association

December 26, 2007

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

**RE: Docket 2006N-0168: Food Labeling: Revision of Reference Values and  
Mandatory Nutrients; Advance Notice of Proposed Rulemaking**

**Request for Extension of Comment Period**

To Whom It May Concern:

America's dairy processors are proud of the nutritious products that we provide to our customers. We are pleased to highlight dairy's unique nutrient profile on our packages, in the Nutrition Facts panel or through nutrient content claims. We plan to submit comments regarding the revision of Daily Values and mandatory nutrients, but respectfully request an extension of the comment period for an additional ninety days, until April 30, 2008.

The International Dairy Foods Association (IDFA), Washington, DC, represents the nation's dairy manufacturing and marketing industries and their suppliers, with a membership of 530 companies representing a \$90-billion a year industry. IDFA is composed of three constituent organizations: the Milk Industry Foundation (MIF), the National Cheese Institute (NCI) and the International Ice Cream Association (IICA). IDFA's 220 dairy processing members run more than 600 plant operations, and range from large multi-national organizations to single-plant companies. Together they represent more than 85% of the milk, cultured products, cheese and frozen desserts produced and marketed in the United States. IDFA can be found online at [www.idfa.org](http://www.idfa.org).

IDFA concurs with earlier comments from the Grocery Manufacturers/Food Products Association that the issues contained in the Advance Notice of Proposed Rulemaking are complex, not straightforward, and require thorough deliberation in order to provide the most helpful answers on this complicated and important topic. In addition to the complexity of the questions presented by the Advance Notice, there are many issues that are addressed in the 75 questions posed, including product formulation, public health recommendations, labeling, and consumer perceptions.

If FDA were to extend the comment period, this would allow for additional time to collect information in order for stakeholders and the general public to provide the most comprehensive comments possible. IDFA believes that this is a significant issue that should be addressed in a thoughtful manner, which would be best allowed for by an extended deadline of April 30, 2008. We look forward to working with FDA on this important topic.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Albee Matto". The signature is written in a dark ink on a light-colored background.

Michelle Albee Matto, MPH, RD

Assistant Director, Nutrition and Labeling