



# American Bakers Association

*Serving the Baking Industry Since 1897*

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Division of Dockets Management  
Food and Drug Administration  
Department of Health and Human Services  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

## REQUEST FOR EXTENSION OF COMMENT PERIOD

The undersigned submits this request on behalf of the American Bakers Association ("ABA") to extend the comment period for the following matter.

### *A. Rulemaking Involved*

ABA requests an extension of the comment period for FDA's Advance Notice of Proposed Rulemaking ("ANPR") on Food Labeling: Revision of Reference Values and Mandatory Nutrients, Docket No. 2006N-0168.

### *B. Action Requested*

ABA requests that FDA extend the comment period in this matter from 90 days to 180 days, to close on April 30, 2008.

### *C. Statement of Grounds*

For over 100 years, ABA has represented the interests of the wholesale baking industry and its suppliers -- companies that work to provide over 80 percent of the wholesome and nutritious bakery products purchased by American consumers, including enriched and whole grain products. ABA appreciates the opportunity to provide comments to FDA on the important issues outlined in the ANPR regarding nutrition labeling, as ABA members have substantial experience and expertise regarding the communication of meaningful nutrition information to consumers. ABA expects to submit substantial comments to share with FDA insights gained from its members' real-world formulation, labeling, and marketing experience. However, the currently-proposed January 31, 2008, deadline for comments may hamper the ability of ABA and other stakeholders to provide the agency with valuable comments.

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ABA generally coordinates and organizes comments among its member companies, in order to provide FDA with a consolidated and well-organized document that efficiently conveys the input of the baking industry as a whole. Because the current comment period spans the holiday season, however, it will be challenging to effectively coordinate industry comments before the January deadline.

Moreover, given the breadth and depth of the issues about which FDA seeks comments and information, a 90-day comment period is too short for interested stakeholders to digest the ANPR and then gather and prepare for submission the data and information they may have to respond to FDA's inquiries. The need for meaningful stakeholder comment is particularly important in this context as FDA considers potential revisions to its approach to nutrition labeling, a substantial undertaking that will ultimately set the course for nutrition labeling for many years to come and which will help shape consumers' efforts to maintain healthy dietary practices.

ABA recognizes the importance of providing stakeholder comments at the ANPR stage, so that the agency's subsequent considerations and rulemaking process are well informed. Given the breadth and importance of the issues at stake in the ANPR, ABA requests that FDA extend the comment period until April 30, 2008, so that the agency may benefit from well-developed and considered comments of interested stakeholders with relevant expertise before taking further steps in the rulemaking process. ABA asks further that FDA consider this request for an extension promptly, and announce an extension decision well in advance of the currently-proposed deadline, so that interested stakeholders have adequate time to formulate comments that will be most valuable to the agency.

Respectfully submitted,



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