



American Dietetic Association  
*Your link to nutrition and health.<sup>sm</sup>*

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June 7, 2005

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

Re: [Docket No. 2005N-0120]  
Agency Information Collection Activities; Proposed Collection; Comment Request;  
Experimental Study of Carbohydrate Content Claims on Food Labels

The American Dietetic Association (ADA) is offering comments in response to the notice soliciting comments on the proposed collection of information from a consumer experimental study of carbohydrate content claims on food labels placed by the Food and Drug Administration (FDA) in the Federal Register on April 9, 2005 (Volume 70, Number 67, page 18032). The ADA is the largest association of food and nutrition professionals in the nation, representing nearly 67,000 members serving the public through the promotion of optimal nutrition, health and well being.

ADA agrees with FDA's decision to conduct the proposed experimental studies to enhance its understanding of consumer response to carbohydrate content claims on food labels. Furthermore, ADA believes that the four research questions described in the notice are appropriate and important for understanding the impact of label formatting on consumers' behavior and understanding of the perceived health value of a food. From these data, the FDA will be better able to discern the impact of the label on consumer behavior and when a label might be misinterpreted or be misleading.

ADA wishes to express a general concern that FDA consider taking a coordinated and integrated approach to reviewing and revising labels, including nutrient and health claims. Consumer research, particularly in regard to labeling format as described in the four research questions, should be designed in a way that is overarching and not specific to any single nutrient. Furthermore, consumer experimental research that includes in-person observation in actual use settings should be considered in addition to internet-based designs.

Thank you for taking our comments into consideration. If you further information or clarification of the comments is needed, please contact me at 202-775-8277 or [mhager@eatright.org](mailto:mhager@eatright.org).

Best regards,

/s/

Mary H. Hager, PhD, RD  
Senior Manager, Regulatory Affairs