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November 20, 2007

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

Re: Docket No. 2006N-0168 – Food Labeling: Revision of Reference Values and Mandatory Nutrients

Dear Sir or Madam:

The Vinegar Institute (VI) is an international trade association representing manufacturers and bottlers of vinegar and suppliers to this industry. Of particular note, the vast majority of vinegar manufacturers in the United States are members of the Institute. VI is requesting a 90-day extension to file comments regarding the Food and Drug Administration's (FDA) advance notice of proposed rulemaking (ANPRM), Food Labeling: Revision of Reference Values and Mandatory Nutrients, published in the *Federal Register* (72 FR 62149) of November 2, 2007. The deadline for submission of comments to the FDA is January 31, 2008.

The FDA is proposing to revise the reference values for nutrition labeling and is requesting input from the public regarding possible changes related to nutrient declaration. Any revisions to the Nutrition Facts Panel would have a significant impact on the food industry, as updates to the food label would be necessary. VI respectfully requests a 90-day extension to the January 31, 2008 deadline to allow adequate time to review the ANPRM and to draft comments in response to the extensive list of questions raised by the FDA.

Sincerely,

Jeannie Milewski
Executive Director

cc: Paula R. Trumbo

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