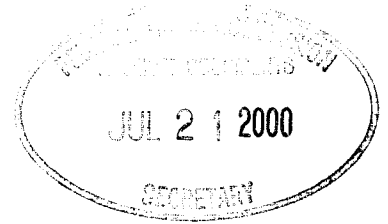




STATE OF TENNESSEE
DEPARTMENT OF HEALTH
CORDELL HULL BUILDING
425 5TH AVENUE NORTH
NASHVILLE, TENNESSEE 37247



July 20, 2000

Secretary, Federal Trade Commission
600 Pennsylvania Avenue, NW, Room H-159
Washington, D.C. 20580

Dear Secretary,

This letter is in response to your Request for Comments Concerning Regulations Implementing the Comprehensive Smokeless Tobacco Health Education Act of 1986.

Smokeless tobacco continues to be a serious public health problem in Tennessee. The Tennessee Youth Tobacco Survey (TnYTS) conducted in 1999 indicates that 9 percent of 8th grade students and 15 percent of 12th grade students in Tennessee are current smokeless tobacco users. This is nearly twice the National average of 7.8 percent use by high school students, reported by the 1999 Youth Risk Behavior Surveillance (YRBS). Clearly consumers are not receiving sufficient warnings about the health risks associated with smokeless tobacco use.

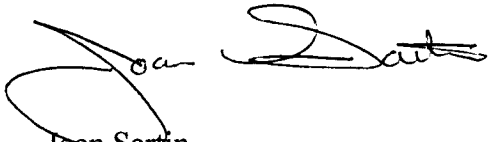
Warning labels on smokeless tobacco products should be one part of public education regarding the health risks of smokeless tobacco use. Research provided by the Massachusetts Tobacco Control Program indicates that labels similar to those used in Canada and Australia are more effective than the standard labeling used in the United States. Our hope is that the FTC will specify in regulations the format of the labels and that they will reflect what the research has found to be effective.

It is important that warning labels have stronger messages than is currently required by law and that the warnings be rotated often to maintain their effectiveness. We are aware that new congressional authority would be required for this but consumers should be given important and graphic information about the addictive properties and health effects of smokeless tobacco use.

Concerning smokeless tobacco, Citizens of the United State deserve at least as much protection as is mandated by the law and regulation in Canada and Australia.

Thank you for considering these comments. I look forward to seeing the FTC take action in this important health issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Joan Sartin". The signature is fluid and cursive, with a large loop at the beginning and a horizontal line at the end.

Joan Sartin
Director Tobacco Control Program
Tennessee Department of Health