

July 7, 2005

Federal Trade Commission
Office of the Secretary
Room H-159 (Annex G)
600 Pennsylvania Avenue NW
Washington, DC 20580

Dear Chairman Majoras:

The FTC Cigarette Reports on Advertising and Promotional Expenditures is one of the most valuable reports published by the Government and is of critical importance for our domestic tobacco control efforts. These reports have been instrumental in my work as former Director of CDC's Office on Smoking and Health, as an expert witness for the FTC, and currently as an expert witness for the Department of Justice. Simply put, without these reports, I would not been able to do my job.

Rather than considering discontinuing these reports, the FTC should consider making the data from previous reports available for scholarly research. As I'm sure you know, the unavailability of disaggregated marketing data is a major obstacle in confirming the relationship between cigarette marketing activities and smoking behavior. The Department of Justice is requesting this type of data directly from the tobacco industry in conjunction with the current litigation, but it is unclear whether that data will be forthcoming. In the meantime, historic disaggregated marketing data would be of immense value to the public health and scientific community and would not be of any competitive harm to the tobacco companies themselves.

In summary, the United States is the only country that I am aware of that requires the reporting of cigarette and promotional expenditures by the cigarette companies. Because it is not otherwise available, it serves a global purpose and public health authorities throughout the world rely upon the FTC Cigarette Reports, and think well of the agency as a result. I would strongly encourage you to continue these reports and to consider making available disaggregated historical data for scientific inquiry.

Sincerely,

/s/

Michael P. Eriksen, Sc.D.
Professor and Director
Institute of Public Health
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