



July 8, 2005

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

Re: Tobacco Reports: Paperwork Comment, FTC File No. P054507

To Whom It May Concern:

The National Center for Chronic Disease Prevention and Health Promotion, Centers for Disease Control and Prevention (CDC), would like to offer its support for the continued collection by the Federal Trade Commission (FTC) of sales and marketing data for cigarettes and smokeless tobacco.

Tobacco use is the leading public health problem in the nation, causing approximately 440,000 deaths each year and costing at least \$75 billion annually in direct medical expenses alone. In order to develop effective interventions, the public health community needs information on industry practices.

Cigarette advertising appears to affect young people's perceptions of the pervasiveness, image, and function of smoking; and appears to increase the risk of smoking among youth. Regulation of advertising and promotion, particularly that which is directed at young people, is very likely to reduce both prevalence and the uptake of smoking.

The cigarette and smokeless tobacco reports produced by the FTC are widely used by the tobacco control community and researchers. These reports are the only data source for surveillance of industry spending on advertising and promotions, and they are essential in monitoring industry tactics regarding advertising, including documenting important shifts such as increases in promotional spending. This information is essential to the development of effective interventions to counteract the effects of industry marketing.

These reports by the FTC also provide a source of information to monitor industry behavior and compliance with restrictions such as those of the Master Settlement Agreement (MSA) resulting from the settlement of 46 states' lawsuits against the tobacco industry; and provide invaluable data on the tobacco industry's response to implementation of voluntary and required advertising restrictions. For example, in the first year after MSA, tobacco industry advertising expenditures increased from \$6 billion to \$8 billion.

The total expenditures also provide an important perspective in considering how much is spent to promote these products compared to the significantly smaller sum allocated in states to prevent tobacco use initiation and promote cessation.

These reports are also used to assist in interpreting the results of evaluations of tobacco control programs. For example, during the implementation of the California program, the industry increased advertising.

The public health community needs advertising information to understand if progress appears to be slower than expected.

The reports also document shifts in the market share for various tobacco products, such as the growth of low tar mentholated cigarettes.

To our knowledge, the tobacco industry collects this information as a usual cost of doing business. Any cost incurred is outweighed by the public health benefit.

Additions that could enhance the usability of the FTC reports would include more details on advertising and promotional expenditures by individual manufacturer, as well as more information by brand or brand categories would be very important (e.g. information on premium vs. discount (generic) brands, menthols, etc.). These data would permit analyses of the influence of specific types of campaigns on brand preference changes among youth. More details on advertising and promotional expenditures at the state-specific, major media markets, or regional level is also needed. Individual states have attempted to estimate the influence of tobacco advertising and promotional spending on local rates of smoking, and impact on reducing efficacy of state tobacco control programs. It would also be helpful to break down categories further, for example, by identifying Internet-based and e-mail advertising. In addition, newly emerging products need to be reported on.

It is very important that the reports continue to collect and publish data that will enable continued surveillance of industry practices and assist the public health community in its efforts to reduce the disease and death caused by tobacco use. Not only are trends in types of advertising expenditures very important to track, but these reports remain the ONLY source of this very critical information. Currently, there is no public or commercial source to replace this report.

Thank you for this opportunity to comment.

Sincerely,

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Acting Director  
National Center for Chronic Disease Prevention  
and Health Promotion  
Centers for Disease Control and Prevention