



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

Office of the Secretary

Donald S. Clark  
Secretary

Direct Dial  
(202) 326-2514

November 19, 1998

The Honorable Donna E. Shalala  
Secretary  
Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

Dear Secretary Shalala:

We are writing to request the assistance of the Department of Health and Human Services in developing specific recommendations on the future of the Federal Trade Commission's program for testing the tar, nicotine and carbon monoxide content of cigarettes.

As you know, cigarette ratings for tar, nicotine, and carbon monoxide are currently determined by machine testing conducted in accordance with a method originally adopted by the Federal Trade Commission in 1967. Both the accuracy and continued validity of this method have come under question. In particular, the National Cancer Institute conducted a review of the method and concluded that significant changes should be made to the FTC testing protocol. The NCI found, among other things, that the existing system does not accurately reflect actual human smoking behavior, which varies widely among smokers, and that smokers who switch to lower tar and nicotine cigarettes may change their smoking behavior in ways that negate potential health benefits.

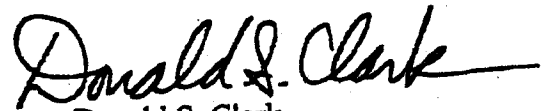
Following the NCI review, the FTC in September 1997 proposed revisions to the test method. The comments we received in response to our proposal raised a number of significant technical and health policy issues, including whether the findings of more recent studies question the presumed relationship between lower tar and nicotine cigarettes and reduced health risks. Because of their scientific nature, these issues fall more within the expertise of HHS rather than the FTC. For this reason, the Commission is requesting that your Department initiate a further review into FTC's cigarette testing method, and include recommendations on whether the system should be continued, and, if it should be continued, what specific changes should be made to the testing methodology to correct the limitations identified by the NCI. We would hope that such work could be completed in 18 months.

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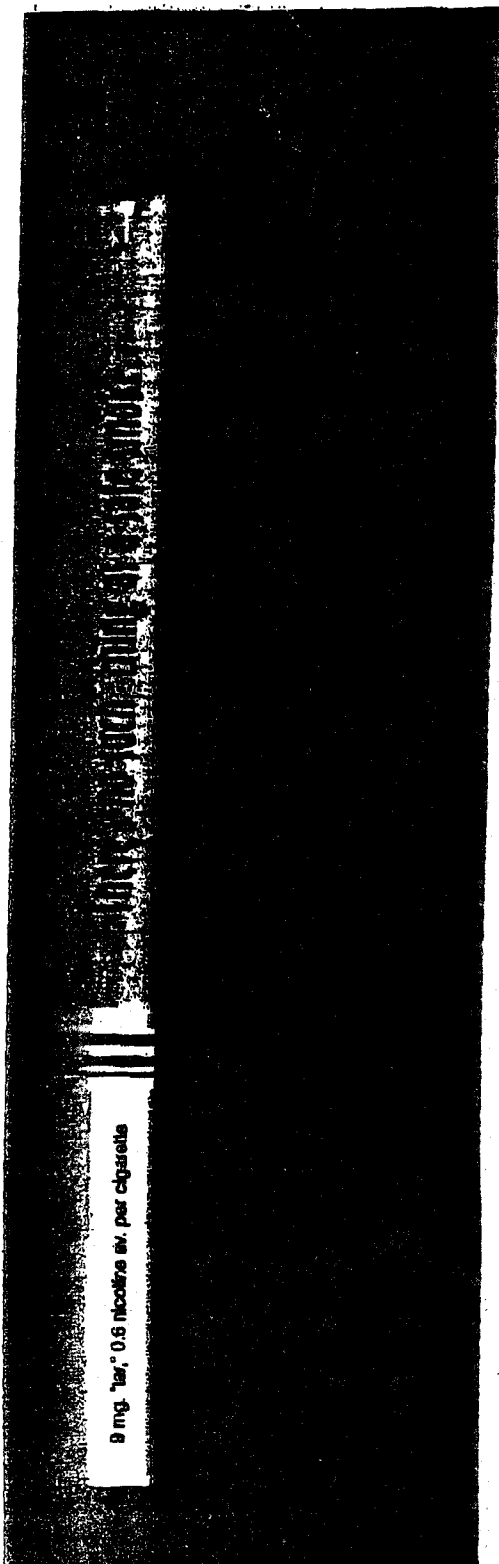
If HHS can assist us in this matter, the Commission will announce that it will participate in the joint review of the test methodology with the goal of arriving at specific recommendations within 18 months. In the interim, we would begin a consumer education program designed to alert consumers to the significant limitations in existing tar and nicotine numbers. Some samples of consumer education materials our staff has developed are enclosed for your review. We would welcome HHS assistance in this effort as well.

We look forward to working with you to improve this system so that it will provide consumers with accurate and useful information.

By direction of the Commission.



Donald S. Clark  
Secretary



The story on tar  
and nicotine?

**Don't  
Count  
on  
the  
numbers.**

There's no such  
thing as a safe  
smoke.