

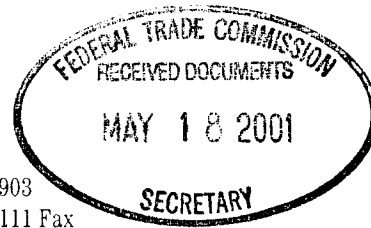
# American Medical Association

Physicians dedicated to the health of America

SmokeLess States  
National Program Office

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**Director**  
Thomas P. Houston, MD

**Deputy Director**  
Donna Grande, MGA

Office of the Secretary  
Federal Trade Commission, Room 159  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Sir/Madam:

The SmokeLess States National Tobacco Policy Initiatives program appreciates the opportunity to submit a statement on the notice published in the *Federal Register* April 10, 2001, regarding the cigarette and smokeless tobacco reports issued by the Federal Trade Commission (FTC).

Over the years, the data supplied by the tobacco industry to the FTC has helped governmental agencies, scientists and researchers, and private-sector groups in the health community follow the activities of the tobacco industry regarding their advertising and promotional expenditures. Because the industry has no other incentive than the FTC mandate to release these data, changing the requirement for their reports to FTC would deprive the health community of information that would be otherwise impossible to obtain. The data help us track expenditure based on type of media outlet, allows us to understand the shifting strategies from advertising to promotional categories, and allows the public to be informed about how much the tobacco companies spend to attract customers to their deadly products.

While the aggregate data currently collected are useful and should continue to be reported, we request that additional data be collected and reported to the public, including:

1. Company and brand-specific data on expenditures for advertising and promotion.
2. A category for advertising at the point of purchase, and another for the Internet.
3. Analysis of the data by state/territory.
4. Subtotals for "light" and "mild" cigarette categories.
5. More detail within the "promotion" category of the types of expenditures that the tobacco industry makes, such as a subcategory for fees paid to retail vendors for prominent placement of brand logos within an outlet, another for coupons and discounts, another for "two-for-one" offers, etc.

Thank you for your consideration of our comments.

Sincerely,

Handwritten signature of Thomas P. Houston in black ink.

Thomas P. Houston, MD  
Co-Director

Handwritten signature of Donna Grande in black ink.

Donna Grande, MGA  
Co-Director



Poster by Erin Fels  
Brooklyn, New York

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