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June 11, 2001

Mr. Timothy Muris
Chairman
Federal Trade Commission
Room 159
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Comments on importance of cigarette and smokeless tobacco reports issued by the Federal Trade Commission [66 Federal Register 18640-18641].

Dear Chairman Muris:

On behalf of the American Dental Association (ADA or Association), I am writing in response to the Federal Trade Commission's (FTC or Commission) request for public comments on whether the agency should continue to issue reports on the sale, advertising and promotion of cigarettes and smokeless tobacco. The ADA is a professional organization that represents approximately 144,000 licensed dentists (over 72 percent of the profession) in the United States. The ADA seeks to promote high quality dental care and the oral health of the American public.

The ADA believes that the FTC cigarette and smokeless tobacco reports play an important role in protecting public health, and should therefore, be continued. The Association has a long history of policies and programs designed to educate the public and the dental profession about the dangers of tobacco use. We rely on the data reported by the FTC to communicate how tobacco promotion efforts affect children and adolescents.

Representing providers concerned with the protection of public health, the ADA also relies on FTC report data in efforts to oppose the advertising of tobacco and smokeless tobacco products in both electronic and print media. The reports serve as one of the few accurate sources of information, and we utilize the data when urging federal, state and local governments to strengthen and expand their efforts concerning tobacco use education, research and cessation programs.

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Every day dentists see first hand the devastating effects tobacco has on oral tissues including cancerous and pre-cancerous lesions, periodontal disease and tooth abrasion. It is alarming to the Association that, as noted from FTC reported data, about \$22 million a day is spent to advertise and promote tobacco products. As a matter of sound public health policy, industry activities to sell, advertise and promote tobacco products must be monitored closely and the FTC reports provide the tools necessary to do so.

The ADA appreciates the opportunity to respond to the attached questions posed by the Commission, and hopes for the continued issuance of the FTC reports.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. Anderton, D.D.S., J.D., LL.M.", written in a cursive style.

Robert M. Anderton, D.D.S., J.D., LL.M.
President

Attachment

RMA:js

American Dental Association - Response to FTC Questions

Question 1 - Who uses the cigarette and smokeless tobacco reports? For what purposes do they use them?

Professional public health organizations, including the ADA refer to the FTC reports to help educate dentists and the public about the affects of advertising on tobacco use, especially use by children and adolescents. The ADA also directs individual association members and state and local dental societies to the FTC reports for use in state/local coalition efforts.

Question 3 - Should the Commission continue to collect and publish data regarding cigarette and smokeless tobacco sales, advertising and promotion? Why or why not?

Yes. The Commission's data is critically important because it provides information separate from the data collected and reported by policy think tank and advocacy organizations. The reports serve as the primary source of industry information on advertising, sales and promotion of tobacco products.

Dentists are concerned about the alarming rise in the use of smokeless tobacco among adolescents over the last two decades. Such an increase has been linked to advertising and marketing practices by the tobacco industry. In order to educate this population against use of spit tobacco, the ADA must have accurate data. The FTC reports provide the ammunition in which to address this and other public health crises concerning tobacco use.

Question 5 - "Is there information about cigarette and smokeless tobacco sales, advertising and promotion that has not been included in the reports, but that would be of use? If so, what additional information would be of use, and why would it be useful?"

We urge, at a minimum, state-by-state reporting of data, which would be useful for state and local dental societies that wish to counter heavy tobacco advertising and promotion efforts with targeted public health messages.

Question 6 - "If the Commission decides to continue issuing reports, how frequently should they be issued (e.g., annually, biennially)? Why?"

The ADA supports annual reporting for both smokeless tobacco and cigarette products. According to a 1998 study in the American Journal of Public Health, current data suggests that each year, more than 800,000 young people (between 11-19) in the United States experiment with spit tobacco. Of these users, nearly one-third become regular users. Annual data will help the ADA and other organizations concerned with public health to prepare for trends in tobacco use that may emanate from advertising and promotional practices.