



June 8, 2001

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

Dear Secretary:

The Partnership for a Healthy Mississippi respectfully submits this request regarding the continued issuance of periodic reports regarding marketing and product promotional expenditures by tobacco manufacturers in the United States. As the organization charged with reducing youth tobacco use in Mississippi, The Partnership finds these reports invaluable in the development of our comprehensive educational and prevention programs, including school and community based programs, media campaigns, and law enforcement programs.

The Partnership and organizations with which we work utilize these tobacco industry reports to monitor the amount of money being spent and where the money is being spent. This information helps us evaluate where our tobacco settlement dollars can be most effective in countering the tobacco industry's marketing of their products to youth. For example, we now know that the industry is publicizing their community projects and that this gives youth a false sense of security with these companies. Children might reason that "If Tobacco Company A promotes programs for the homeless or for needy children, why would they want me to start a habit that could kill me?" Tobacco industry reports help us assess how children are being targeted and how we can educate them about evaluating all information given to them. These decision-making skills serve children well for a lifetime.

Reports such as those collected and released by the FTC also help state tobacco prevention, education, and cessation programs justify the need for states to fund these programs from the tobacco settlement dollars. All too often, state legislatures are tempted to provide tax relief and employee pay raises with this money. Without justification and proof of what tobacco companies are still spending on marketing and promotions, our fear is that many states will think the problem has gone away and begin to spend settlement dollars on other budget items.

Additionally, the reports force tobacco companies to be accountable to the public. For too many years, their practices and reports were hidden from the general public. At a minimum, these reports force tobacco manufacturers to monitor their spending and justify

it to youth advocates and health organizations around the world. The reporting requirement may be inconvenient for tobacco companies, but is certainly a justifiable request from the companies that cost the United States billions of dollars in healthcare expenditures annually. As the allegedly low-nicotine products come to the market, these reports will grow in their importance as source material for developing facts that we use to educate our youth about the dangers associated with tobacco use.

The Partnership requests that your agency continues to collect annual data reported in the periodic reports from cigarette and smokeless tobacco companies. Distribution via the Internet as a PDF file is an easily accessible way for interested parties to obtain the information. The reports could be enhanced with state-by-state breakdown of the reported marketing expenditures, brand-specific marketing expenditure data, and promotional and marketing expenditures of low-tar/low-nicotine products versus traditional tobacco products.

On behalf of The Partnership, I thank you for your consideration and appreciate your efforts to maintain the publication of the periodic reports from tobacco companies. If we can be of further assistance to you, please contact me at (601) 362-0740.

Sincerely,



Vivien Carver, Ed.D.  
Executive Director