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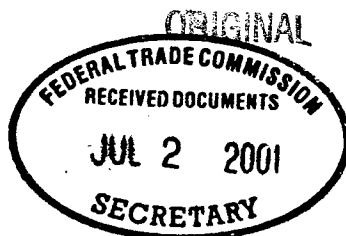
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June 20, 2001

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



Dear Sir/Madam:

On behalf of the Harvard Tobacco Control Working Group, I would like to express support of the Federal Trade Commission's (FTC) continued publication of annual reports on advertising and promotion expenditures of the tobacco industry. We strongly believe the FTC should continue to collect data regarding cigarette, smokeless tobacco, and cigar industry expenditures and make these data available to the public. The FTC is currently the only reliable source of this type of data, which is imperative for the public to be able to monitor the tobacco industry. This is one of the highest public health priorities the nation faces.

This is a historic time in tobacco control, with the recent Master Settlement Agreement (MSA), the Engle trial in Florida, the pending Department of Justice lawsuit, and pending legislation for the regulation of tobacco by the Food and Drug Administration. The increased public awareness about tobacco industry marketing practices makes access to these data important for concerned citizens, academia, and tobacco control advocates. Because the FTC provides these data, the integrity of the data is not questioned. Without FTC reports, the public would be forced to rely on the tobacco industry to produce such data. This would introduce the potential for substantial bias and make valid conclusions about industry compliance with the MSA and other federal policies impossible.

In terms of the format for reporting, annual reports are the best way to monitor trends over time in tobacco advertising and marketing expenditures. Annual reporting also allows the effect of major events, such as the MSA, to be studied in a timely fashion. Changing to a biannual format would be very restrictive in terms of the quality of conclusions able to be drawn from the data. The current format of the reports presents a succinct yet comprehensive picture of industry expenditures. It is best to have a consistent format for presenting data that is followed longitudinally.

The Harvard Tobacco Control Working Group wholeheartedly supports continuation of the FTC's annual reporting of the tobacco industry's marketing and advertising expenditures.

Thank you,

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