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Federico Cruz-Uribe, MD, MPH
Director of Health

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

Dear Sir or Madam:

I am writing this letter to strongly encourage the Federal Trade Commission (FTC) to continue to produce its annual report on the tobacco industry's sales, advertising, and promotional expenditures.

This information is essential to the efforts of the Tacoma-Pierce County Health Department (TPCHD) to curb tobacco use, and the TPCHD uses the information in a variety of ways. First, TPCHD's current media literacy program uses this information when it educates adolescents about the economics of the tobacco industry and motivates them to develop counter-advertising messages. Second, the FTC's report provides the context and justifies the need for TPCHD's *Operation Storefront*, which works with local teen volunteers to measure the level of tobacco advertising and promotions. Most importantly, information contained in the report is disseminated to a variety of local organizations and coalitions. Many misperceptions about the tobacco industry's sales continue to exist. Many people working within public health and health care systems are unaware of the scope of the tobacco industry's promotions and the role promotional allowances and retail-value-added promotions play in tobacco marketing. Regular and current information that documents these practices is necessary to promote meaningful and responsive policies.

The TPCHD would welcome state-specific expenditure data in the areas of advertising and promotion. The availability of accurate data will enhance the ability of community coalitions to advocate for counter-tobacco funding at the state legislature, and it will allow the TPCHD to continue to strengthen its own media literacy and counter-marketing programs. At the very least, I urge the FTC to require a more complete breakdown of the promotional allowance and retail-value-added expenditure categories, as the importance of these categories is often the most difficult to convey to community groups.

Finally, although the industry continues to fail to report any expenditures for product placement in motion pictures and television, the TPCHD would welcome any efforts by the FTC to strengthen requirements so that the industry's product placement expenditures are also subject to reporting.

Sincerely,

A handwritten signature in dark ink, appearing to read "Federico Cruz-Uribe", is written over a light-colored background.

Federico Cruz-Uribe, MD, MPH
Director of Health

FCU:cjr