



PATIENT CARE
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DEPT. OF CANCER PREVENTION,
EPIDEMIOLOGY & BIOSTATISTICS

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May 30, 2001

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

Re: Response to Federal Register/Vol. 66, No. 69/Tuesday, April 20, 2001/Cigarette and Smokeless Tobacco Reports: Request for Public Comment

Dear Commissioners:

As a public health scientist who has relied upon the Federal Trade Commission's (FTC) annual reports on the sales, advertising, and promotion of cigarettes and smokeless tobacco products for my research, I'm writing to urge you to continue issuing these reports and expand their content. The FTC's annual reports are the only source of consistent and reliable data on tobacco industry advertising and promotion expenditures. As such, these reports have proven to be an invaluable source of data for my research on factors influencing population trends in tobacco use behaviors.

In the past, I have used the FTC reports to examine shifting trends in the market share of low tar and low cost cigarette brands. I have also published research comparing the brand choices of teenagers and adults, which has demonstrated that young people especially appear to smoke the most heavily advertised cigarette brands. I also serve as Deputy Editor for the Journal **Tobacco Control**, which over the past decade has published several studies on the impact of cigarette advertising and promotions, which have relied upon the data contained in the FTC reports. In the past, our journal has reprinted excerpts of the FTC reports so that this important information could be more widely disseminated to public health practitioners and researchers.

It is no exaggeration to say that if these data were not collected and published by the FTC, research on the implications of tobacco advertising and promotion would suffer a severe setback, one that would damage the public's interest in understanding the effects of such advertising and promotion. Moreover, research on the topic of the influence of tobacco marketing would be greatly advanced if the FTC would expand coverage to include marketing expenditure data specific to companies and on a state-specific basis.

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Detailed data by brand family and variations within brands would be particularly helpful to addressing a series of crucial research questions on the effects of marketing on the demand for specific types of cigarettes (e.g., "low yield cigarettes", new novel tobacco products such as Eclipse and Accord). Especially if the FTC is able to refine the level of detail, as described here, producing data tables so that they could be searched and manipulated electronically would be most helpful.

I thank the FTC for having performed the invaluable service of collecting and disseminating these data for so many years now. I urge you to continue publication of these data and to give serious consideration to expanding the scope of these data in ways that will help facilitate a better understanding of how tobacco product marketing influences trends in tobacco use and ultimately the public's health.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Cummings", with a long horizontal flourish extending to the right.

K. Michael Cummings, PhD, MPH
Chairman, Department of Cancer
Prevention, Epidemiology & Biostatistics