

Washington State Association of Local Public Health Officials

AN AFFILIATE OF
WASHINGTON STATE ASSOCIATION OF COUNTIES

May 30, 2001

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

Re: Annual Reports on Tobacco Industry Marketing and Promotional Expenditures

The Washington State Association of Local Public Health Officials (WSALPHO) strongly urges the Federal Trade Commission to continue issuing its periodic reports on how much the cigarette companies and smokeless tobacco companies spend each year to market and promote their products. WSALPHO is a professional organization whose membership represents the leadership of all 34 local public health jurisdictions serving all 39 counties in the State of Washington. Prevention and control of the use of tobacco products is a priority public health issue and protecting children from the devastating effects of tobacco exposure and use is paramount.

The annual reports on tobacco company marketing expenditures are critically important for public health efforts to monitor the tobacco companies' marketing activities, stop tobacco marketing to kids, and to make the case why government investments in tobacco control (including public education and counter-marketing efforts) are needed to reduce the toll of tobacco use in the United States. Public Health officials use the reports to estimate (based on population) what the tobacco industry spends in each state to promote its products. Without the most recent FTC reports, we would not know, for example, that the industry spent more than \$8.4 billion (\$22.5 million per day) nationwide on marketing cigarettes in 1999, which dwarfs state and federal spending on tobacco prevention. Nor would we know that the cigarette companies increased their marketing expenditures by more than 22% since 1998, when they signed onto the multistate settlement agreement that they say has significantly restricted their marketing activities.

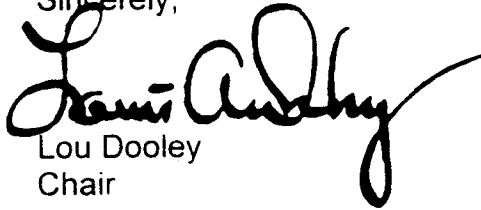
Additional information that would be helpful to public health efforts would be to include the following:

- A state-by-state breakdown of the reported marketing expenditures;
- Company-specific or even brand-specific marketing expenditure data;

- Subtotals for marketing expenditures for regular versus "reduced-risk" tobacco products;
- A breakdown of the different types of expenditures the companies make within the existing promotional-allowance and retail-value-added expenditure categories (which account for the vast majority of all promotional spending by the companies).

WSALPHO urges the Federal Trade Commission to continue issuing these important reports so that the public health community continues to have this critical tool available for its tobacco prevention and control efforts.

Sincerely,



Lou Dooley
Chair