



ASSOCIATION OF STATE AND TERRITORIAL HEALTH OFFICIALS
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Office of the Secretary
Federal Trade Commission
Room 159
600 Pennsylvania Ave., NW
Washington, DC 20580

The Association of State and Territorial Health Officials (ASTHO) and its Tobacco Control Network support the continuation of the Federal Trade Commission's (FTC) annual report on advertising and sales of cigarettes and smokeless tobacco. The annual cigarette reports are of vital importance to the public health community, including state health officials and other federal, state, and local policymakers, because these reports are the only resource for national data on tobacco advertising.

ASTHO is the national non-profit organization representing the state and territorial public health agencies of the United States, the U.S. Territories, and the District of Columbia. ASTHO's members, the chief health officials of these jurisdictions, are dedicated to formulating and influencing sound public health policy, and to assuring excellence in state-based public health practice. The ASTHO Tobacco Control Network seeks to institutionalize tobacco use prevention and control within public health agencies and influence sound public health policy change in order to assure that the *Healthy People 2010* tobacco goals are met.

The reports are used by state health departments to convey messages to the media of the large amounts of money that the tobacco industry is spending on advertising to entice the American public to buy their products. State health departments also use the data to educate and inform policymakers and citizens about the practices of the tobacco industry. The tobacco industry spends billions of dollars on advertising in the United States, whereas state health departments have considerably less funding available to them to educate the American public about the addictiveness of cigarettes, to prevent youth from smoking, and to provide services to prevent death and treat disease caused by tobacco use. The FTC annual report, as a government report, is viewed as authoritative and accurate.

ASTHO views the Master Settlement Agreement between the state Attorneys Generals and the tobacco industry as an historic opportunity to reduce the damage caused by tobacco products and improve the general health of the public. The outcomes of a landmark case, such as this, need to be enforced. The FTC's annual Cigarette Report is currently the only method of tobacco industry oversight. Certain provisions in the settlement agreement such as the removal of all tobacco advertising from billboards, public transportation systems, arenas, malls and video arcades require surveillance and monitoring. As a result, some reporting system is necessary to ensure compliance with the settlement agreement.

Though ASTHO does not believe the current format of the report needs improvement, additional information could be included in the report to strengthen the FTC's consumer education mission and to provide data crucial for state health departments' tobacco prevention and control efforts. Such data would include:

- a listing of domestic advertising and promotional expenditures by state and by regions within states,

This information would aid state health departments by providing state legislatures, media and the public with more accurate information on tobacco industry advertising and marketing practices. State health department media campaigns can evaluate the cost/benefit of spending tobacco settlement and other funds in relation to the amount the tobacco industry spends in their state.

- a listing of domestic advertising and promotional expenditure in smaller time frames (quarterly or bimonthly),

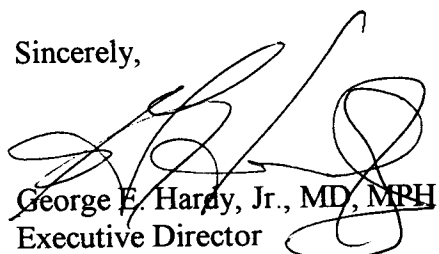
Knowing the seasonal trends in tobacco advertising would help state health departments strategize release of their tobacco prevention and cessation media advertisements.

- a listing of the names of magazines in which tobacco advertising is placed and if possible, the provision of subscriber demographics, specifically age and gender of the readership of each magazine.

Several studies have indicated that there has been an increase in youth exposure to tobacco messages since the settlement agreement was signed in November 1998. For example, the Massachusetts Department of Public Health May 2000 report, "Cigarette Expenditures: Before and After the Master Settlement Agreement," found that cigarette advertising expenditures in magazines with more than 15 percent youth readership increased 33.1 percent after the settlement agreement. A May 2000 American Legacy Foundation analysis found that eight of the top ten cigarette brands reached more than 70 percent of youth 5 times or more in 1999.

In conclusion, ASTHO and its Tobacco Control Network strongly support the continuation of the FTC annual reports on advertising and sales of cigarettes and smokeless tobacco. This is a useful tool for tobacco prevention programs in state government and for the American public for educational purposes. Improvements could be made through the inclusion of additional information to further consumer education and monitor industry practices.

Sincerely,



George E. Hardy, Jr., MD, MPH
Executive Director