



4800 Montgomery Ln  
Suite 1000  
Bethesda, MD 20814  
tel: 301-718-8440  
fax:301-718-0034

## **Comments In Support of the Continuation of FTC Reports on the Sales, Advertising and Promotion of Tobacco Products**

**Jack E. Henningfield, Ph.D. and  
Christine A. Rose, MS  
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We are writing in strong support of the continuation of the Federal Trade Commission reports on the sales, advertising and promotion of cigarettes and smokeless tobacco products. Our efforts, funded by the Robert Wood Johnson Foundation Innovators Combating Substance Program, are focused on ensuring that tobacco policy issues are grounded on science and guided toward the improvement of public health. Policy makers and the concerned public alike have a critical need for accurate and accessible reporting on the distribution of the billions of dollars spent each year on tobacco product marketing. This information is necessary to help guide the relatively small amount government expenditures on counter-marketing and public education efforts and is critical in monitoring marketing activities that are directed at or potentially attractive to children. Furthermore, these reports could be made more useful by including the following:

1. A state-by-state breakdown of the reported marketing expenditures;
2. Company-specific and brand-specific marketing expenditure data;
3. Subtotals for marketing expenditures for regular versus "reduced-delivery" tobacco products;
4. 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).
5. Presentation in a spreadsheet format (e.g. Microsoft Excel) so that data are searchable and can be plotted and analyzed further if desired.

The information contained in these reports should be available to those who want more information on promotion of these widely used and ultimately deadly products. We urge you to continue to provide these reports.