

June 6, 2001

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

RE: Tobacco Industry Marketing Reports

Dear Sirs:

Oral Health America's National Spit Tobacco Education Program (NSTEP) not only supports maintaining the annual FTC Tobacco Industry Marketing Reports, but also would like to see the reports expanded to provide more state specific data. The information provided by these reports is essential for NSTEP to monitor the marketing focus of the tobacco industry and in determining the different usage trends in leaf/chewing tobacco and moist snuff.

Without this report we would not have determined the continued dramatic increase in the usage of moist snuff (the preferred smokeless tobacco by our youth). Moist snuff accounted for \$1.58 billion of the \$1.94 billion worth of smokeless tobacco sold in 1999.

We also need to know the total number of pounds of smokeless tobacco sold by manufacturers to wholesale and retailers. This information allows us to determine whether our educational program is having impact on consumption of spit tobacco. Without the reports we would not been able to determine that the 109.4 million pounds of smokeless tobacco reported sold in 1999 by manufactures to wholesalers and retailers was the lowest level ever reported.

As a private non-profit organization with limited resources, we must have this valuable data to better direct our limited educational dollars to have maximum impact. In order to prevent another generation of our youth from becoming addicted to these insidious products we must know as much as possible about the tobacco industry's smokeless tobacco advertising and promotional expenditures.

This includes collecting advertising and promotional expenditures by category (for example sponsorship of sporting and entertainment events versus advertising at the point of sale).

Without FTC report we would not have been able to determine that the advertising and promotional budget for smokeless tobacco has doubled from 1985 to 1999 (\$80 million versus \$170.2 million). In the same time period



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revenues from smokeless tobacco have increased from approximately \$730 million to \$1.94 billion. These increases parallel major increase in smokeless tobacco use by our youth. 17.1% of high school boys are now regular users. Because of the report we now have a better understanding about what we are up against and can better direct our educational programs.

We feel the present report should be expanded to include state-by-state specific breakdown of reported marketing expenditures. This would allow NSTEP to better target states where promotion of smokeless tobacco is higher. It would also allow us to correlate increased advertisement and promotion to increases in consumption by our youth. The report should also include company-specific and brand-specific marketing expenditures data. This information would allow us to correlate youth preferences with state specific company and brand advertisement and promotional activities.

We cannot counter what we do not know. The report needs to include a breakdown of marketing expenditures for regular versus "reduced-risk" products. This will allow us to see if this approach is working and whether total smokeless tobacco consumption is effected. We will also in the long term be able to determine if individuals will use more of the "reduced-risk" products in order to obtain the required nicotine levels.

Thank you for allowing us to provide our comments. If you have any questions, please call us at 770-753-0952.

Sincerely,

A handwritten signature in black ink that reads "Paul M. Turner Jr." with a stylized flourish at the end.

Paul M. Turner Jr.
Director
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Oral Health America

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