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June 6, 2001

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

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

Dear Commissioners:

The Society for Research on Nicotine and Tobacco (SRNT) urges you to maintain the Federal Trade Commission's annual reports on the sales, advertising, and promotion of cigarettes and smokeless tobacco products. SRNT is composed of over 500 of the world's leading nicotine and tobacco scientists and is the nation's only scientific organization devoted exclusively to the generation of new knowledge concerning nicotine and tobacco. Our members' interests range from the effects of nicotine on brain function at the molecular level to the public health implications of tobacco control policies.

The FTC's annual reports are the only source of consistent and reliable data on tobacco industry advertising and promotion expenditures. As such, they are invaluable to the research community that we represent. Specifically, multiple studies of the nature and impact of tobacco advertising and promotion have utilized the data disseminated through these annual reports. These studies permit public health researchers to evaluate how both the quantity of advertising and promotion in the aggregate and its distribution among print and other advertising and other promotional methods affect smoking and the use of smokeless tobacco. Interest in this research covers both children and adults. Many of the research studies that have used these data have been cited in reviews of the impact of advertising in the annual Surgeon General's reports on smoking and health, including, for example, the 25th anniversary report, published in 1989, the 1994 report on *Preventing Tobacco Use Among Young People*, and, most recently, in the two reports released within the past year, the 2000 report entitled *Reducing Tobacco Use* and the 2001 report on *Women and Smoking*. 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

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promotion would suffer a severe setback, one that would damage the public's interest in understanding the effects of such advertising and promotion.

According to SRNT members who use these data, annual publication is sufficient. Members would appreciate expansion of the coverage to include marketing expenditure data specific to companies and state-specific data as well (where relevant). If possible, 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, on both smoking initiation by children and maintenance by adults (e.g., "full-flavored" [strength] cigarettes vs. "low-yield" cigarettes). 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 very helpful.

We thank the FTC for having performed the invaluable service of collecting and disseminating these data for so many years now. SRNT believes that it would be a serious blow to research and scholarship, and thus potentially to the health of the public, were this service to be discontinued. We urge you to maintain it.

Sincerely,

John R. Hughes, M.D.
Chair, Policy Committee