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Office of the Secretary
Federal Trade Commission Room 159
600 Pennsylvania Avenue, NW
Washington, DC 20580
June 1, 2001

Dear Sirs:

The American Lung Association of Vermont (ALA-VT) urges the FTC to continue issuing the periodic reports about how much cigarette companies spend each year to market and promote their products. The reports are critical to our program planning and advocacy efforts in tobacco control.

1. Specifically, ALA-VT would use the state-by-state breakdown of the reported marketing expenditures to track trends in marketing and correlate them with smoking rates. We can use the state specific figures to monitor what activities the tobacco companies are using in Vermont, so that we can promote government investment in public education and counter marketing, and policy development that protects our clean indoor air, and our youth.
2. Brand specific data, and data that is specific to regular vs. "reduced-risk" products is critical to public education efforts and ongoing prevention and smoking cessation programs. ALA-VT needs this data to build targeted programs to prevent early death and disability from tobacco use.
3. The FTC should continue to collect and publish data regarding cigarette and smokeless tobacco sales, advertising and promotion. Without the data we would not know that the tobacco companies have increased marketing expenditures by more than 22% in 1998, when they signed a multistate settlement agreement that they say has significantly restricted their activities. VT. is part of that multistate agreement, yet our college age smoking rates have skyrocketed, as have the rates among the Gay and Lesbian communities; aggregates that have been specifically targeted by the tobacco industry.

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Founded in 1904, the American Lung Association includes affiliated associations throughout the U.S., and a medical section, the American Thoracic Society.

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Asthma Clinical Research Center at the University of Vermont**

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4. The breakdown of the different types of expenditures should be included. That information is critical toward promoting policy and programs towards aggregates that are targeted by the tobacco industry.
5. It would be helpful to have information about sales and marketing of cigars. Cigars have become a popular tobacco product, which is seen as "safe". The marketing information about this tobacco product would help ALA to promote programs that counter that myth.
6. Reports would be best if they were available every 6 months, in Dec. and June. This way, the latest information would be available for our winter legislative session, and new information would be helpful for summer planning months, for our fall through spring campaigns.

In summary the ALA-VT urges you to continue publishing this document and to further categorize the reporting of the tobacco industry marketing activities.

Sincerely,

Anne Watson Bongiorno, RN, MS
Manager of Tobacco Control
Manager Government Relations

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