



OFFICE OF THE
SENIOR VICE PRESIDENT
AND GENERAL COUNSEL

August 25, 1981

Matthew L. Myers, Attorney
Division of Advertising Practices
Federal Trade Commission
Bureau of Consumer Protection
Washington, D.C. 20580

Dear Mr. Myers:

Reference is made to your letter of August 19 with regard to the proposed changes in the Federal Trade Commission Testing Laboratory "tar" and nicotine test method.

As to the first of the issues you raise, American Brands reiterates the position taken in my letter of July 1, 1981 that a change in test methodology based on assumptions as to a correlation between a laboratory test method and human smoking rests on a fallacious assumption and is without merit. As I have indicated, we will respond to the second issue at a later time.

Very truly yours,

Arnold Henson
Senior Vice President
and General Counsel

AH:JC

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