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December 11, 2017

Leroy A. Richardson
Information Collection Review Office
Centers for Disease Control and Prevention
1600 Clifton Road NE
MS-D74
Atlanta, GA 30329

**RE: National Youth Tobacco Surveys (NYTS) 2018-2020
(OMB Control Number 0920-0621, expires 01/31/2018)—
Revision—National Center for Chronic Disease
Prevention and Health Promotion (NCCDPHP), Centers
for Disease Control and Prevention (CDC).
Docket No. CDC-2017-0092**

Dear Mr. Richardson:

Truth Initiative welcomes the opportunity to submit comment regarding the National Youth Tobacco Surveys (NYTS) 2018-2020. Truth Initiative has a long history with the NYTS and applauds the goals of NYTS regarding monitoring tobacco use trends among youth as tobacco use remains the leading cause of preventable death and disease in the United States. This research is vital for informing policy and programs on tobacco control.

Truth Initiative is committed to creating a generation of Americans for whom tobacco use is a thing of the past. We believe each individual has the right to live in a world free from tobacco dependence, tobacco-related death and disease, and the devastating dollar cost to individuals and society. Truth Initiative's proven-effective and nationally recognized public education programs include truth®, the national youth smoking prevention campaign that has been cited as contributing to significant declines in youth smoking; EX®, an innovative smoking cessation program; and research initiatives exploring the causes, consequences and approaches to reducing tobacco use. Truth Initiative also develops programs to address the health effects of tobacco use – with a focus on priority populations disproportionately affected by the toll of tobacco – through alliances, youth activism, training and technical assistance. Located in Washington, DC, the organization was created as a result of the November 1998 Master Settlement Agreement (MSA) between attorneys general from 46 states, five U.S. territories and the tobacco industry.



Truth Initiative has signed on to joint comments submitted by a number of leading public health organizations. While we agree with these comments, there are suggestions for the NYTS that Truth Initiative would like to recommend.

Truth Initiative recommends that the questions about cigar use be separated into the following categories: large cigars and cigarillos/little cigars.

Currently, the NYTS asks about the use of cigars, cigarillos, or little cigars together as one category. Because the users and the usage patterns appear to vary across the different types of cigars, Truth Initiative encourages CDC to ask questions in the NYTS about typical large, traditional cigars, sometimes referred to as “stogies,” separately from the questions about little cigars or cigarillos. Research suggests large cigar users and little cigar and cigarillo users have different demographic profiles and may have different patterns of multiple product use, with little cigars and cigarillos being more popular among young adults, African-Americans, individuals with lower education and those reporting current cigarette, marijuana and blunt use.¹⁻³ In July 2017, FDA announced that it intends to issue an ANPRM to solicit additional comments and scientific data related to the patterns of use and resulting public health impacts from premium cigars. It would be beneficial for FDA to have data from the NYTS in order to make a determine how to regulate this tobacco product category.

Truth Initiative also recommends that JUUL be added as a brand example for electronic cigarettes.

Currently, the NYTS states the following: “The next 11 questions are about electronic cigarettes or e-cigarettes. E-cigarettes are battery powered devices that usually contain a nicotine-based liquid that is vaporized and inhaled. You may also know them as e-cigs, vape-pens, hookah-pens, e-hookahs, e-cigars, e-pipes, personal vaporizers, or mods. Some brand examples include NJOY, Blu, Vuse, MarkTen, Logic, Vapin Plus, eGo, and Halo.”

Truth Initiative recommends that JUUL be added as a brand example. There is evidence that youth are using this brand of electronic cigarettes and referring to it as “Juuling”.⁴⁻⁶ As the *Boston Globe* article states, “Although many parents have never, or only recently, heard of Juuling, every student approached by a Globe reporter in multiple suburbs not only was familiar with the product, but had a story.” Because the landscape of the category of electronic cigarettes is still rapidly changing, it is important that CDC use terms that the NYTS population is familiar with in order to have data that best reflects U.S. youth tobacco product prevalence rates.

Truth Initiative appreciates CDC taking these comments into account as it develops the NYTS for the period of 2018-2020. Data from the NYTS is valuable to Truth Initiative as we examine trends in the use of different tobacco products among youth in the U.S.



Please do not hesitate to contact Maham Akbar, Public Policy Manager at makbar@truthinitiative.org or 202-454-5932, should you need more information or have questions about this submission.

Sincerely,

M. David Dobbins
Chief Operating Officer



References

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2. Borawski EA, Brooks A, Colabianchi N, et al. Adult use of cigars, little cigars, and cigarillos in Cuyahoga County, Ohio: a cross-sectional study. *Nicotine & tobacco research : official journal of the Society for Research on Nicotine and Tobacco*. 2010;12(6):669-673.
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