

SPECIAL REPORT

Federal Trade Commission Report for 1989

Pursuant to the Federal Cigarette Labeling and Advertising Act

In January 1992 the US Federal Trade Commission (FTC) released a report on cigarette advertising and promotion in the United States for the year 1989. It was the latest in a series of reports on cigarette advertising and promotion submitted by the FTC to the US Congress, as required by law.

The complete report contains 43 pages and 11 tables. A portion of the report is reproduced below. References to omitted tables are deleted and footnotes renumbered. Places where material has been omitted are indicated by an ellipsis and minor editorial changes are given in square brackets. A few subheadings have been added to facilitate reading.

Copies of the full report may be obtained by writing to: Federal Trade Commission, Division of Advertising Practices, 6th Street and Pennsylvania Avenue, NW, Washington, DC 20580, USA (fax (1 202) 316 3259).

This report, along with others in the series, contains detailed data on cigarette advertising and promotional expenditures. These data are collected by the FTC from the six major cigarette manufacturers in the United States by a compulsory process. The report shows the diversity of information on cigarette advertising, marketing and promotion collected by the US government from the cigarette industry and other sources. Tobacco control advocates should consider petitioning governments that continue to permit tobacco advertising to collect, compile, and disclose similar information, if such governments do not already do so.—ED

1989 Commission activity

IN THE MATTER OF R.J. REYNOLDS TOBACCO CO. In 1989, Commission staff continued its prosecution of a 1986 complaint against R.J. Reynolds Tobacco Co., for allegedly making false and misleading advertising claims regarding the health effects of smoking. In 1989, Reynolds signed a consent order, settling the litigation. The order directed Reynolds to cease from misrepresenting, "in any matter, directly or by implication, in any discussion of cigarette smoking and chronic or acute health effects, ... the results, design, purpose or content of any scientific test or study explicitly referred to concerning any association between cigarette smoking and chronic or acute health effects." On May 8, 1990, the Commission issued a final consent order settling all charges.

TOBACCO PRODUCT PLACEMENT IN FILMS

In August, 1989, the Chairman of the Subcommittee on Transportation and Hazardous

Materials of the Committee on Energy and Commerce of the U.S. House of Representatives, requested that the Commission review "tobacco product placement," the practice of a tobacco company paying a filmmaker to ensure the placement of particular brand of cigarettes in a film. The letter stated that Philip Morris had told the Subcommittee that in the fall of 1988 it had paid \$350,000 to the company making the movie *License to Kill* in order to have Lark cigarettes appear in the movie.

As part of its review of this issue, the Commission began requiring the cigarette companies to report any payments for tobacco product placement in the special reports that they file with the Commission annually. All six cigarette companies report that they did not pay for tobacco product placement in 1989. This does not indicate that the companies did not or do not continue to make tobacco products and signage available to filmmakers free of charge in the hopes that they will be used as props.

Statistical data**CIGARETTE CONSUMPTION**

...[In] 1989, 525.6 billion cigarettes were sold domestically, 35.1 billion fewer cigarettes than were sold in 1988. This is a drop in sales of 6.3 percent from the 1988 level, which is the largest drop since the Commission began collecting this data in 1963. Domestic cigarette sales had climbed steadily from 1963 through 1981, with the exceptions of 1964 and 1969, but have declined steadily, with the exception of 1984, by a total of 17.4 percent, since 1981.

...Per capita consumption of cigarettes declined from 3,073 in 1988 to 2,846 in 1989, a drop of 7.4 percent, or 227 cigarettes per person. This is the sharpest drop since the Commission began collecting this data in 1963. Per capita consumption has declined continuously in the U.S. since 1973.

CIGARETTE ADVERTISING AND PROMOTIONAL EXPENDITURES

...[The table shows] the amounts spent on cigarette advertising and promotion for the years ...[1980, 1985, and] 1989. [The table breaks] out the amounts spent on the different types of media advertising (i.e., newspaper, outdoor, etc.) and sales promotion activity (i.e., distribution of cigarette samples, public entertainment, etc.) and also give[s] the percentage of the total amount spent for the various types.

\$3.6 billion was spent on cigarette adver-

*Domestic cigarette advertising and promotional expenditures for the years 1980, 1985, and 1989 (thousands of dollars)**

Type of advertising	1980		1985		1989	
	\$	% of total	\$	% of total	\$	% of total
<i>Print advertising</i>						
Newspapers	304,380	24.5	203,527	8.2	76,993	2.1
Magazines	266,208	21.4	395,129	16.0	380,393	10.5
Outdoor	193,333	15.6	300,233	12.1	358,583	9.9
Transit†	26,160	2.1	33,136	1.3	52,294	1.4
Point of sale	79,799	6.4	142,921	5.8	241,809	6.7
Subtotal‡	869,880	70.0	1,074,946	43.4	1,110,072	30.7
<i>Promotions</i>						
Promotional allowances	179,094	14.4	548,877	22.2	999,843	27.6
Sampling distribution¶	50,459	4.1	140,565	5.7	57,771	1.6
Specialty item distribution**	69,248	5.6	211,429	8.5	262,432	7.3
Public entertainment††	16,914	1.4	57,581	2.3	92,120	2.5
Direct mail	‡‡		‡‡		45,498	1.3
Coupons and retail value added	‡‡		‡‡		959,965	26.5
All others¶¶	56,694	4.6	443,043	17.9	89,290	2.5
Subtotal‡	372,409	30.0	1,401,495	56.6	2,506,919	69.3
Total‡	1,242,289	100.0	2,476,441	100.0	3,616,993	100.0

* Data in this table are from Tables 3A, 3B, and 3C of the original report. Definitions in the footnotes below are taken from the text of the report and from previous FTC reports. Separation of the advertising categories into print advertising and promotions does not appear in the original report but is shown here to demonstrate the relative shift in expenditures over time from print advertising to promotional activities.

† Advertising in or on public transportation facilities.

‡ Because of rounding, sums may not equal totals.

|| Paid to retailers and any other persons (other than full-time company employees involved in cigarette distribution and sales) in order to facilitate the sale of cigarettes. Includes payments by cigarette companies to retailers for shelf space (slotting allowances), cooperative advertising (advertising allowances), and trade promotions to wholesalers.

¶ Includes the costs of the cigarettes themselves and the costs of organizing, promoting, and running sampling efforts.

** Net costs of distributing non-cigarette products (including the costs of such items), either bearing or not bearing cigarette brand names, to consumers by sale, redemption of coupons, or otherwise. Beginning in 1988 items in this category that were blister-packed to packs of cigarettes were redesignated as retail value added expenses.¹¹

†† Promotion and sponsorship of sporting, musical, and other public entertainment events bearing or otherwise displaying the name of the company or any of its cigarettes.

‡‡ Expenditures are included in the all others category.

||| Includes cents-off coupons, multiple-pack promotions – for example, a free pack of cigarettes with the purchase of one or more packs – and retail value added offers (e.g., giving away non-cigarette items, such as key rings or lighters, blister-packed to cigarette packs). Before 1988 expenses for retail value added offers were included in the category specialty item distribution.¹²

¶¶ Includes expenditures for audiovisual promotions and endorsements and testimonials. The category endorsements and testimonials includes, but is not limited to, all expenditures made to procure cigarette use; the mention of a cigarette product or company name; the appearance of a cigarette product, name, or package; or other representation associated with a cigarette product or company, in any situation (e.g., motion pictures, stage shows, or public appearance by a celebrity) in which such use, mention, or appearance may come to the public's attention.

tising and promotion in 1989. This was an increase of \$342 million, or 10 percent, from the \$3.27 billion spent in 1988. When 1980 expenditures are adjusted for inflation to constant 1989 dollars,¹ they total \$1.83 billion dollars. Thus, in the decade of the 1980s, actual spending on advertising and promotion by the cigarette companies has increased by more than 97 percent, or \$1.78 billion.

When the total number of cigarettes sold is factored against total advertising and promotion expenditures, it indicates that an average of \$1.37 was spent on advertising and promotional expenditures for each carton of cigarettes sold domestically in 1989. In contrast, at the beginning of the decade, in 1980, after adjusting for inflation to constant 1989 dollars, only about 58 cents was spent on advertising and promotion per carton of cigarettes sold.

Spending in newspapers on cigarette advertisements in 1989 (around \$77 million) decreased by almost \$30 million from 1988 spending (\$105.7 million). As a percentage of total advertising and promotional spending for the year, newspaper advertising reached an all-time low in 1989 of 2.1 percent. Cigarette advertising in newspapers peaked in 1981 at \$358 million, when it accounted for 23 percent of the total expenditures for cigarette advertising and promotion.

Spending on magazine advertisements

reached \$380 million in 1989. This was an increase of more than \$25 million, or 7 percent, from 1988. However, as a percent of total advertising and promotion expenditures, the amount spent on magazine advertising decreased from 10.8 to 10.5 percent. Spending to advertise cigarettes in magazines peaked in 1984, when the cigarette companies reported spending \$426 million.

Spending on outdoor advertising increased by more than \$39 million, or 12 percent, to total \$358.6 million in 1989. In 1988, \$319.3 million had been spent on outdoor advertising, and in 1987, around \$270 million had been spent on outdoor advertising. Outdoor spending comprised nearly 10 percent of total advertising and promotional spending in 1989, reflecting a decrease from the early 1980s, when it hovered around 15 percent of the total.

Spending on transit advertising reached \$52.3 million in 1989, an increase of \$7.9 million, or 17.8 percent, from 1988. Its share of the total spent on advertising and promotion remained at 1.4 percent for the third consecutive year.

Spending on point-of-sale advertising by the cigarette companies increased by almost 9 percent from 1988 (\$222.3 million) to 1989 (\$241.8 million). As a percentage of total advertising and promotion, point-of-sale advertising remained at nearly 7 percent in 1988 and 1989.

Promotional allowances cost the cigarette companies \$999.8 million in 1989, making this the largest single category reported on this table for the fifth consecutive year, and comprising 27.6 percent of the total spent advertising and promoting cigarettes for the year. Spending on promotional allowances in 1989 was \$120 million more than the companies spent in 1988. Examples of promotional allowances include amounts paid by the cigarette companies to retailers for shelf space (slotting allowances), and cooperative advertising (advertising allowances). This category also includes trade promotions to wholesalers. Trade promotions are designed to encourage wider distribution of a company's brands and to encourage more comprehensive services by wholesalers.

Couponing and retail value added now comprise the second largest advertising and promotion spending category. This category includes cents-off coupons, multiple pack promotions, and retail value added offers.² The cigarette companies were first asked to report these expenses as a distinct category in 1988. In 1989, \$959.9 million, or nearly 27 percent of all advertising and promotional expenditures, was spent on the couponing and retail value added category. This was an increase of \$120 million, or 14 percent, from the amount reported in 1988 (\$874 million).

In 1989, the amount reported as direct mail expenditures (\$45.4 million), increased slightly from 1988 (\$42.5 million). The cost of a piece of direct mail bearing a cents-off coupon offer would have been counted in the direct mail category prior to 1988. It has been counted in the coupon and retail value added category for 1988 and 1989.

The amount reported spent on giving away non-cigarette specialty items, such as key chains, calendars, lighters, and tee-shirts, increased by over \$72 million from 1989, reaching \$262 million in 1989. Although... spending on specialty items reached its highest level in 1987, the 1987 amount included those specialty items that were blister-packed to packs of cigarettes, which were redesignated as retail value added expenses beginning in 1988.

Resources devoted to giving away free samples of cigarettes declined in 1989. The amount spent distributing cigarette samples decreased by 22 percent from 1988 (\$74.5 million) to 1989 (\$57.8 million). Giving away cigarette samples accounted for only 1.6 percent of the total spent on advertising and promotion in 1989, which is the lowest percentage on record for cigarette sampling since the Commission began collecting this data in 1970. In contrast, cigarette sampling expenditures had reached a high of 7.9 percent of the total spent on advertising and promotion in 1982.

Spending on public entertainment remained around 2.5 percent of the total in 1989, with expenditures reported at \$92 million. The cigarette companies reported that no money had been spent on endorsements and testimonials for cigarettes in 1989. As mentioned

earlier in this report, in 1989 the Commission began requiring the cigarette companies to report any money or in-kind consideration paid or provided for the purpose of tobacco product placement in films. This practice, which would have been counted as an endorsement and testimonial expense, was reported as unfunded.

LOW-TAR CIGARETTES

...[T]he domestic market share for all cigarettes yielding 15 mg or less of tar increased slightly from 1988 (54.2 percent) to 1989 (55.1 percent). This almost restores the 1987-1988 decrease, which was the first since 1984, and followed a 3 percent[age point] increase in 1987 from 1986.

When market share for low-tar cigarettes is analyzed by individual tar yield category, it reveals an increase in the middle categories (6 and 9 mg or less) and in the top category (15 mg or less). The market share for cigarettes yielding 3 mg or less and 12 mg or less tar decreased.

Since 1979, the majority of advertising and promotional dollars expended by the six major cigarette companies has been devoted to cigarettes yielding 15 mg or less tar. Spending on lower-tar cigarettes increased from 60.7 percent in 1988 to 62.6 percent in 1989.

FILTER CIGARETTES

...[F]ilter cigarettes continued to make up 95 percent of all cigarette sales in 1989. Filter cigarettes have dominated the market since the Commission began collecting this data in 1963, rising from 58 percent then to 95 percent of the market since 1988. ...[I]n 1989, 96 percent of total cigarette advertising and promotional activity was devoted to filter cigarettes.

CIGARETTE LENGTH

...Although declining since 1967, the King-size (79-88 mm) category continues to hold the greatest percentage (57 percent) of the market. This category is followed by the Long (94-101 mm) group, which has increased steadily since 1967 and now holds 39 percent of the market. The remaining categories - Regulars (68-72 mm) and Ultra-Longs (110-121 mm) - each account for two percent.... While the market share [of Long and Ultra-Long cigarettes] (41 percent) stayed the same from 1988 to 1989, the percentage of total advertising and promotional expenditures (46 percent) for the longer cigarettes increased by 1 percent[age point] from the 1988 figure.

MENTHOL CIGARETTES

...In 1989, menthol cigarettes' market share decreased by one percent[age point] to 27 percent of the market, the first change since 1980, when it decreased from 29 to 28 percent. Non-menthols increased to 73 percent of the market in 1989. The cigarette companies

reported that 31 percent of total cigarette advertising and promotional expenditures was devoted to menthol cigarettes, and 69 percent was devoted to non-menthol brands, in 1989.

Practices and methods of cigarette advertising and promotion in 1989

TRENDS IN ADVERTISING AND PROMOTION IN 1989³

New products introduced

(a) Lessened or altered smoke

A variety of cigarette brands introduced in 1989 featured alterations to produce either less smoke or less offensive smoke. The *U.S. Distribution Journal* asserted that these new introductions were designed to address problems of smokers who feel uncomfortable about smoking in public.⁴ The *Wall Street Journal* reported, "Low-sidestream cigarettes, most aimed at women – who, marketers say, worry more than men about their social image and annoying those around them – are becoming a niche all their own... Marketers can now tinker with the size, taste, smell and look of smokes in ways they could only dream of before."⁵

Chelsea, introduced by R.J. Reynolds, reportedly produces a fresh-smelling aroma, which has been compared to vanilla or mocha, from the burning end.⁶ Lorillard Inc. introduced a lemon-flavored brand of cigarettes targeted at women, Spring Lemon Lights, which *U.S. Distribution Journal* characterized as "the latest of the new-age cigarettes."⁷ Vantage Excel 100s, test marketed by R.J. Reynolds in 1989, reduced the amount of lit-end smoke by combining a new tobacco blend and a special high-porosity paper.⁸ Virginia Slims Superslims were introduced in 1989 by Philip Morris as a low-smoke cigarette.⁹ The Superslims cigarette, which is also described as ultra-low-tar and "skinny" (i.e., only 17 mm in circumference, compared with 25 mm for standard cigarettes), was designed to emit 70 percent less smoke from the lit end than conventional cigarettes.⁹ Superslims created such a splash, reported the *Wall Street Journal*, that supplies ran out in several parts of the country, prompting Philip Morris to run full-page ads apologizing for the inconvenience.⁵

(b) Lowered nicotine or tar levels

Philip Morris introduced the Next brand of cigarettes in 1989, which it touted as "denicotined tobacco with rich flavor," according to *Advertising Age*.¹⁰ According to the *Wall Street Journal*, consumers were told that the nicotine-removal process is natural, and marketing analysts speculated that the company's strategy, which closely paralleled that of Sanka decaffeinated coffee, was designed "to imply it has a safer cigarette – without actually asserting it."¹¹ Next has the same amount of nicotine as some varieties of Carlton and Now brands, but Next has significantly higher levels of tar, according to data collected by the FTC.

Advertising and promotional campaigns

(a) Outdoor advertising

Advertising Age, *Candy Marketer*, and the

New York Times all report that more is spent on outdoor advertising for cigarette brands than for brands of any other product.¹² However, according to the *New York Times*, nationwide billboard surveys showed a wide disparity in the amount of tobacco advertising in black and white communities.¹² The *NYT* article reported that in 1989, health officials, city leaders, members of Congress, neighborhood groups and consumer advocates began objecting to that disparity.

Objections were also raised about the giant billboard at Times Square in New York City that featured the cartoon camel, "Smokin' Joe," the centerpiece of the Camel cigarette "Smooth Character" advertising campaign. According to *Tobacco Reporter*, the billboard, erected in 1989, was the largest, most technologically advanced billboard ever constructed in the area.¹³ The billboard reportedly takes up the space of five tennis courts, and uses 2,600 lights and more than 1.5 miles of neon. The "Smooth Character" campaign was ranked by Video Storyboards Tests as the second most popular print campaign (among all products) in America in 1989.¹⁴

(b) Sponsorship

The six major U.S. tobacco companies reported to the Commission that they spent \$97.7 million on sports and sporting events in 1989.¹⁵ This is up more than 16 percent from the \$84 million that they reported spending in 1988, the first year for which the Commission collected this information. Cigarette companies sponsor a variety of sporting events, including professional golf, tennis, and auto and motorcycle racing. The events are typically named for a brand of cigarettes, and equipment, banners, programs, uniforms, etc., bearing the cigarette brand name are used at the events.

R.J. Reynolds initiated the "Winston Sports Connection" consumer promotion in 1989, according to the *U.S. Distribution Journal*.¹⁶ The promotion offered participants the chance to win tickets to professional sports championship events and participants were automatically registered for the Winston Sports Connection, a program featuring year-round promotions. The article reported that a Reynolds spokesman explained that sports marketing has become "very important" to R.J. Reynolds as well as to other tobacco companies because of the restrictions surrounding tobacco advertising.¹⁶

(c) Buy some, get some free

A traditional strategy for increasing sales has been buy-some-get-some-free offers. These multi-pack promotions increased in frequency in 1988–89, according to a report in the *U.S. Distribution Journal*.¹⁷ This is supported by data collected by the Commission showing that the amount spent on the promotional category including coupons, multi-pack promotions, and retail value added offers, reached over \$900 million in 1989, as shown in [the table] of this report.

(d) Increased emphasis on trade promotions
 Calling it a "slugfest," *U.S. Distribution Journal* reported that due to increasing difficulties surrounding tobacco advertising and marketing, the cigarette companies "have turned the storefront into the new battleground."¹⁸ The article explained that, in trying to ensure that their brands are available whenever and wherever a smoker goes to buy cigarettes, several new promotional programs directed at cigarette wholesalers were introduced by the cigarette companies in 1989 and 1990.

According to the article, Philip Morris revamped a trade promotion program called Masters in Excellence, the R.J. Reynolds Company introduced its Winners: Partnership in Performance program, Brown & Williamson initiated its MVP Program, and American Tobacco began a trade program called Achievement through Distribution and Display (ADD). These programs, through cash incentives, seek to promote additional distribution of cigarettes to the retail level, improve in-stock positions, and eliminate out-of-stock situations. Millions of dollars are also spent on retail promotions, including slotting allowances (payments for shelf space) and promotional displays and merchandise, according to the article.¹⁸

Promotions to cigarette wholesalers, distributors, and retailers make up the category known as Promotional Allowances in [the table]... of this report.... [S]pending on Promotional Allowances grew to nearly one billion dollars in 1989, which represented over 27 percent of all the money spent advertising and promoting cigarettes that year.

SUMMARY

Many of the trends reported on for 1989 are continuations of those observed throughout the 1980s. *The Washington Post* reported that "the anti-smoking movement in the United States met with unprecedented success in the decade just past."¹⁹ At the same time, "cigarette stocks since 1981 have outperformed the Standard & Poor's 500-stock index in every year but one."

To combat declining sales, cigarette marketers reportedly employed three tactics in the 1980's: developing low-smoke or low-nicotine brands; expanding price-value brands; and stealing share from competitors' existing brands.²⁰ The effort to steal share from competitors is thought to have contributed to the introduction of a vast selection of new brands and varieties of cigarettes in the 1980s.²¹ Cigarettes have been described as "the epitome of what advertisers call 'niche' marketing,

with more than 300 brands, targeted by gender, race and socioeconomic group."²²

Analysts predict that in the 1990s, there will be increased spending in targeted media, including regional advertising such as newspapers and billboards, and decreased spending on national advertising such as magazines.²³ Heavy spending on point-of-purchase, couponing, and trade promotion is expected to continue.²³

- 1 Price index is the implicit price deflator for GNP; from National Income and Product Account Tables of the Bureau of Economic Analysis; Table 7-4.
- 2 Multiple pack offers are when additional packs of cigarettes are given free with cigarette purchases, such as "buy one, get one free." Retail value added offers include non-cigarette items, such as keychains or lighters, given away blister-packed to cigarette packs.
- 3 As requested by Congress in the Federal Cigarette Labeling and Advertising Act, the Commission includes in this report information on "current practices and methods of cigarette advertising and promotion." The trends and conclusions reported in this section are a summary of significant reports published in the trade and general press and government documents.
- 4 "Socially acceptable cigarette?," *U.S. Distribution Journal*, May 1989, p. 15.
- 5 Peter Waldman, "Tobacco Firms Try Soft, Feminine Sell," *Wall Street Journal*, 19 December 1989, sec. B, p. 1.
- 6 "RJR alters smoke again; new brand 'smells good'," *Tobacco Reporter*, March 1989, p. 40.
- 7 *U.S. Distribution Journal*, May 1989, p. 15.
- 8 "Third RJR cigarette to address social concerns," *U.S. Distribution Journal*, March 1989, p. 78.
- 9 "Philip Morris Cos. Unveils Slim, Low-Smoke Cigarette," *Wall Street Journal*, 29 September 1989, sec. B, p. 5.
- 10 Judann Dagnoli and Steven W. Colford, "PM lights 'de-nicotined' Next," *Advertising Age*, 14 August 1989, p. 46.
- 11 Alix M. Freedman, "'De-Nicotined' Next Gets Pitched By Philip Morris Just Like Decaf," *Wall Street Journal*, 4 August 1989, sec. B, p. 3.
- 12 R. Craig Endicott, "The Top 200 Brands: McDonald's tops in spending," *Advertising Age*, 21 March 1990, p. 25; "Tobacco companies top spenders in outdoors ads," *Candy Marketer*, January/February 1990, p. 70; "An Uproar Over Billboards in Poor Areas," *New York Times*, 1 May 1989, sec. D, p. 10.
- 13 "Brand News: Camel's giant billboard returns to Times Square," *Tobacco Reporter*, August 1989: 28.
- 14 "Top 10 Print Campaigns of 1989," *Video Storyboard Tests' Commercial Break: Tracks Consumers' Response to Current Advertising*, Vol. 2, No. 3, May 1990, p. 1.
- 15 This includes expenditures for the sponsoring, advertising or promotion of sports or sporting events, support of an individual, group, or sports team, and purchase of or support for equipment, uniforms, sports facilities and or training facilities; and all expenditures for advertising in the name of the cigarette company or any of its brands in a sports facility, on a scoreboard, or in conjunction with the reporting of sports results; and all expenditures for functional promotional items (clothing, hats, etc.) connected with a sporting event.
- 16 "RJR 'connects' with sports promos," *U.S. Distribution Journal*, March 1989, p. 80.
- 17 "Multi-pack promotions push cigarette sales," *U.S. Distribution Journal*, March 1989, p. 12.
- 18 "Slugfest heats up at front end: Vendors compete with merchandise, promotion," *U.S. Distribution Journal* April 1990, p. 16.
- 19 Pat Widder, "Tobacco Firms' Profits Healthy Despite Anti-Smoking Movement: Increases in Exports, Prices Boost Income," *The Washington Post*, 4 September 1990, sec. B, p. 4.
- 20 Rebecca Fannin, "Industry Outlooks 1990: Cigarettes," *Marketing & Media Decisions*, January 1990, p. 40.
- 21 "Spotlight on the United States: An increasingly segmented market," *Tobacco Reporter*, November 1989, p. 42.
- 22 Carol Matlack, "Smoke-Free Advertising," *National Journal*, 24 February 1990, p. 455.
- 23 Rebecca Fannin, "Industry Outlooks 1990: Cigarettes," *Marketing & Media Decisions*, January 1990, p. 40.