To: Caryn Cohen,

Office of Science, Center for Tobacco Products, FDA

Date: January 11, 2019

Re: Docket FDA-2018-N-4162

Dear Dr Cohen

This is a written document regarding the Swedish Match(SM) application to be discussed on 2/7/19. I am a Professor and physician at the University of Vermont who has over 400 publications on behavioral aspects of tobacco use. I currently serve on the SM Advisory Board. The following remarks are solely mine

I think it important that the TPSAC hear my beliefs that Swedish Match is tobacco company that is quite different than other companies for several reasons. First, since 1999 almost all of SM's sales have been for non-combustible tobacco products which are recognized as being much safer than combustible products sold by the other tobacco companies. In addition, SM's snus product has been a major factor in reducing death and disease in some countries: e.g., Sweden - again something other companies cannot claim. Finally, I have found SM to exemplify high ethical standards in regards to our board. For example, unlike other tobacco companies and even most pharmaceutical companies, I was not asked to sign a confidentiality agreement or an exclusivity agreement, nor have I been asked to promote their products. In summary, many tobacco companies may claim that they are now different, but only SM has concrete evidence of being different.