

UNIVERSITY of LOUISVILLE  
*Health Sciences Center*

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Dear Dr. Gerberding and Dr. Sondik,

I read with interest the publication Advance Data Number 378 entitled "Smoking and Alcohol Behaviors Reported by Adults: United States, 1999-2002" (November 29, 2006). I am writing to both of you because this matter may involve shared jurisdiction between the National Center for Health Statistics (NCHS), which publishes the "Advance Data" series, and the Centers for Disease Control and Prevention (CDC) Division of Health and Nutrition and Examination Surveys, the affiliation of the report's 6 authors, led by Cheryl D. Fryar, MSPH.

The report provides definitions (Technical notes section), and presents prevalence estimates for the following adult health risk behaviors:

- "Cigarette smoking"
- "Cigar use"
- "Alcohol drinking"
- "Spit tobacco use"

I highlighted "spit tobacco" in the above list, because the report's use of this term is clearly inconsistent with its use of other terms relating to tobacco use and drinking behaviors. Furthermore, I believe that the use of "spit" tobacco violates NCHS and CDC guidelines for ensuring the quality of information disseminated to the public. The NCHS and CDC guidelines are identical with respect to this matter, as it is each agency's policy to "ensure and maximize the quality, **objectivity**, utility, and **integrity** of information that it disseminates to the public." (emphasis added) Furthermore, each agency strives "to provide information that is **accurate**, reliable, clear, complete, **unbiased**, and useful." (emphasis added)

Whereas "cigarette smoking," "cigar use," and "alcohol drinking" are conventional, objective, unbiased and accurate terms for describing those adult behaviors, the term "spit" tobacco as used in this document is unconventional, slanted, biased and inaccurate.

As is recognized by other federal agencies such as the Food and Drug Administration and the Federal Trade Commission, the conventional term for the category of tobacco products placed in

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the mouth is "smokeless tobacco." Other appropriate terms that are often used to refer to specific products are "chewing tobacco" and "snuff." In contrast, "spit" tobacco is a derogatory term that is used by tobacco control extremists to advance their agenda to denigrate smokeless tobacco products and the individuals who use them.

The quality of information gathered by government surveys is dependent upon the cooperation and trust of survey respondents. As such, survey instruments must contain language that is clear, understandable and objective. The National Health and Nutrition Examination Surveys, from which this report was derived, use the terms "chewing tobacco" or "snuff." It is clear from the technical notes section of the report (page 24) that the authors made a deliberate decision to substitute "spit tobacco" for "chewing tobacco" and "snuff." This substitution constitutes unobjective and biased communication with respect to the other terms used in the report, and more importantly, with respect to users of these products.

Furthermore, the use of the term "spit" tobacco is inaccurate because it does not account for modern smokeless tobacco products, many of which can be used without spitting. Thus, its use in this report may introduce ambiguity with respect to the products actually used, which may affect the integrity and accuracy of this report and others of this type.

Under the provisions of Section 515 of Public Law 106-554, and for the reasons specified above, I am asking the CDC and NCHS to issue a corrected version of the Advance Data Report Number 378. Furthermore, I am asking that CDC/NCHS officials and staff to avoid the use of the term "spit" tobacco in future official government publications, and to remove the term from existing web pages. This term is inappropriate because it is inaccurate, biased and unobjective. In addition, its use is inconsistent with the fully appropriate and non-pejorative terms "cigarettes," "cigars" and "alcohol" used in this and other government documents

According to the CDC website, the agency "is committed to achieving true improvements in people's health." That commitment can not be realized until the information disseminated by NCHS and the CDC is accurate, unbiased and objective.

Sincerely,



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