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LATHAM & WATKINS^{LLP}

April 23, 2020

BY EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, DC 20436

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Re: *Certain Tobacco Heating Articles and Components Thereof,*
ITC Docket No. 337-TA-3447

Dear Secretary Barton:

Enclosed please find as a courtesy filing the Public Interest Comments of the Schizophrenia and Related Disorder Alliance of America.

Respectfully submitted,

/s/ Jamie D. Underwood

Jamie D. Underwood
of LATHAM & WATKINS LLP

Enclosure

cc: Service List

Philip Morris Products, S.A.



SARDA Schizophrenia and Related Disorders Alliance of America

Improving Lives Affected by Psychosis

2308 Mount Vernon Ave. Suite 207 | Alexandria, VA 22301 | (240) 423-9432 |

www.sardaa.org

April 21, 2020

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The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

Re: *Certain Tobacco Heating Articles and Components Thereof*

Dear Secretary Barton:

The Schizophrenia and Related Disorders Alliance of America (SARDA) appreciates the opportunity to provide commentary on the Public Interest Statement filed on April 9, 2020, by Complainants RAI Strategic Holdings, Inc.; R.J. Reynolds Vapor Company; and R.J. Reynolds Tobacco Company. As an advocate seeking to improve lives affected by schizophrenia-related brain illnesses (mental illnesses involving psychosis), SARDA urges the International Trade Commission (Commission) to consider the disproportionate, negative impact the exclusion of the IQOS heated tobacco system would have on those with past mental illness and history of substance use.

Individuals living with mental illness and substance use disorders (SUD) have a higher prevalence of traditional cigarette smoking. For example, traditional smoking amongst individuals with schizophrenia is nearly 60%. Furthermore, traditional smoking among individuals with a psychiatric illness accounted for two-thirds of the difference in life expectancy relative to nonsmokers without a serious psychiatric disorder. People living with mental illness also may have a genetic predisposition toward addiction and/or may self-medicate using nicotine.

We believe that in order to reduce the high incidence of traditional smoking in the community SARDA serves, having a variety of cessation and harm reduction tools is vital. IQOS, which has been available in other countries for several years, should be one of the tools available to Americans. After years of analysis, in April 2019, the Food and Drug Administration (FDA)

cleared IQOS for sale in the US market via a Pre-Market Tobacco Application (PMTA). A PMTA clearance requires a finding that the product is “appropriate for the protection of public health.” No other heated tobacco product or e-cigarette has received this FDA clearance.

“Every year, almost 1,000 smokers and nonsmokers are killed in home fires caused by cigarettes and other smoking materials, making this the #1 cause of home fire deaths in the United States. Most fires caused by smoking materials start on beds or furniture, or in trash.” In addition to smoking reduction, the IQOS provides a unique reduction of cigarette caused fires due to the flameless and heat protective device. This is a life-saving benefit.

Given the challenges that must be overcome to reduce rates of traditional smoking in the groups SARDAA assists specifically, and for Americans generally, removal of a product that has successfully completed the necessary regulatory steps in this country and has been shown to successfully transition smokers off combustible cigarettes, the deadliest form of tobacco use, would not serve the public interest. We hope the Commission will take SARDAA’s comments into account as it assesses the impact of an IQOS exclusion.

Sincerely,



Linda Stalters, MSN, APRN (ret.)
Chief Executive Officer & Founder
Schizophrenia and Related Disorder Alliance of America

CERTIFICATE OF SERVICE

It is hereby certified that copies of **PUBLIC INTEREST COMMENTS** were served on April 23, 2020 as follows:

<p>The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, SW, Room 112 Washington, DC 20436</p>	<p>By EDIS</p>
<p>David M. Maiorana Ryan B. McCrum JONES DAY 901 Lakeside Avenue Cleveland, OH 44114</p> <p>Stephanie E. Parker JONES DAY 1420 Peachtree Street, N.E. Suite 800 Atlanta, GA 30309</p> <p>Anthony M. Insogna JONES DAY 4655 Executive Drive Suite 1500 San Diego, CA 92121</p> <p>John J. Normile JONES DAY 250 Vesey Street New York, NY 10281 Tel: (212) 326-3939</p> <p><i>On Behalf of Complainants RAI Strategic Holdings, Inc., R.J. Reynolds Vapor Company, and R.J. Reynolds Tobacco Company</i></p>	<p>By Email dmaiorana@jonesday.com rhmccrum@jonesday.com separker@jonesday.com aminsogna@jonesday.com jjnormile@jonesday.com</p>

/s/ Erika J. Weinstein
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