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**BROWN & WILLIAMSON TOBACCO CORPORATION**

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March 14, 1978

CONFIDENTIAL

MESSRS. AHRENSFELD  
STEVENS  
GREER ✓  
CROHN  
HENSON

Gentlemen:

Re: FTC Smoking Machine for Carbon Monoxide Analysis

There is reason to believe that the FTC has received from Phipps and Bird a new smoking machine for carbon monoxide analysis, and that it has been in use at the FTC since December 1977.

The Commission may announce that it is testing cigarette smoke for carbon monoxide together with "tar" and nicotine, and ask the companies to publish the results as they apply to particular brands. Because of this possibility, it has been suggested that the industry should do some initial background work in gathering data in order to be prepared to respond to any initiative by the FTC.

No action should be taken which would in any way expedite the Commission's consideration of CO.

In the interest of careful consideration of the facts and full development of the best arguments and positions relative to CO testing, the suggestion has been made that each company should conduct carbon monoxide tests utilizing monitor cigarettes. In addition to a normal "tar" delivery cigarette, a low "tar" monitor might be employed as well. Each company would forward its data in blind form, i.e. method undisclosed and company undisclosed, to Covington & Burling who would then forward the data to Dr. Arkin for statistical analysis. Such an analysis could produce useful information as to inherent deficiencies in any carbon monoxide testing program for either regular "tar" or low "tar" products as proposed by the Commission as well as in the required sample size.

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The analysis might be useful in the presentation of the industry's objections to a proposed FTC program to undertake carbon monoxide testing in a machine that reads CO along with "tar" and nicotine. In addition Dr. Arkin might be available as a witness on this subject.

To restate, each company would determine CO delivery using the reference cigarettes and its respective testing methods. Only the analytical data would be sent to Mr. Topol who in turn would ask Dr. Arkin to do a preliminary evaluation of the inter-laboratory variations. There would be no discussion or passage of information at this time on the various methods used.

This matter will be discussed tomorrow evening, March 15.

Cordially,

*Ernest Ruppel*

EP/dlt

cc: Mr. William Shinn