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April 6, 1998

BY HAND

Beth M. Grossman, Esq.
Federal Trade Commission
Bureau of Consumer Protection
Division of Advertising Practices
601 Pennsylvania Ave., N.W.
Washington, DC 20580

APR 13 1998

KMM

Dear Ms. Grossman:

We are transmitting herewith, on behalf of our client Philip Morris Incorporated ("Philip Morris"), materials completing Philip Morris' response to the letter dated January 26, 1998 from Lisa B. Kopchik to Geoffrey C. Bible, concerning Marlboro Ultra Lights cigarettes. Specifically, Philip Morris is providing the following:

1. The material responsive to Paragraph 2 of the letter request was provided by the Leo Burnett advertising agency and are marked as documents LB MUL 000361 through 000721,
2. In response to Paragraph 3 of the letter request, Philip Morris is attaching hereto the names of individuals from Philip Morris, and Leo Burnett who had significant participation in the development, preparation or placement of the Marlboro Ultra Lights advertisements we provided to you on March 27.
3. The documents responsive to Paragraph 5(a) of the letter request are marked as follows: documents PM MUL 000108 through 000156 (from the files of Philip Morris) and documents LB MUL 000001 through 000064 (from the files of Leo Burnett).
4. The documents responsive to Paragraph 6 of the letter request are marked as follows: documents PM MUL 000157 through 000300 (from the files of Philip Morris) and documents LB MUL 000065 through 000360 (from the files of Leo Burnett).

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5. In addition, we understand that you have requested a timetable for the launch of Marlboro Ultra Lights cigarettes in test markets as well as the nationwide launch. A schedule of the rollout of the product is attached hereto.

We have been informed that there are no responsive consumer perception or marketing and advertising strategy documents with respect to the general attributes or concepts of "ultra low tar," "light," or "ultra light", as requested in paragraphs 5(b) and 7 of the letter request. The responsive consumer perception and marketing and advertising strategy documents that are specific to the Marlboro Ultra Lights brand are produced herewith, as noted above.

In light of the nonpublic nature of this inquiry, Philip Morris considers this letter and the materials attached hereto to be confidential and accordingly requests that they be accorded the full protection available under the Commission's rules and regulations. In addition, the documents, and in particular, those which discuss the 1998 nationwide launch of the product, contain confidential and sensitive business information and are designated confidential for this reason as well. Please do not hesitate to give me a call should you have any questions concerning these materials.

Sincerely,



Randal M. Shaheen

Enclosures

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