



August 15, 2025

Jeffrey M. Zirger
Information Collection Review Office
Centers for Disease Control and Prevention
1600 Clifton Road NE, MS H21-8
Atlanta, Georgia 30329

RE: National Youth Tobacco Survey Docket No. (CDC-2024-0106)

Dear Mr. Zirger:

The undersigned state Attorneys General write to express our strong bi-partisan support for the continuation of the National Youth Tobacco Survey (NYTS). The NYTS is a significant, long-running, and comprehensive source of data that tracks youth use and access to tobacco and nicotine products. NYTS data is a critical part of efforts by Attorneys General across the Nation to monitor the effectiveness of the Tobacco Master Settlement Agreement (MSA) and also informs our tobacco policy and enforcement efforts, including youth e-cigarette and nicotine pouch use.

In 1998, 52 state and territorial Attorneys General, including the undersigned States, entered the MSA with the four largest tobacco companies in the United States to settle dozens of lawsuits. Among other important objectives, Attorneys General brought these lawsuits to recover billions of dollars in health care costs associated with treating smoking-related illnesses and to reduce and prevent smoking in the United States, especially among youth. The MSA requires the Attorneys General and the tobacco companies to meet every three years to coordinate efforts to reduce youth tobacco use. The MSA also bars the tobacco companies from misleading the public regarding the negative health impacts of tobacco use.


In addition to the MSA, Attorneys General have undertaken several initiatives to limit youth exposure to tobacco and nicotine products. These efforts include urging film studios, creative guilds, and streaming platforms to curb tobacco imagery in popular media, entering into agreements with major retail chains to limit the accessibility and appeal of products to youth in the retail environment, and enforcing a range of state-specific tobacco control and consumer fraud laws.

These critical efforts rely on the information provided to the States by the NYTS. The NYTS provides comprehensive data and insights regarding youth tobacco use, including product trends, prevalence rates, knowledge and attitudes about tobacco use, access to tobacco products, and risk factors influencing initiation and continued use. NYTS data is used to help Attorneys General monitor youth smoking rates, as required by the MSA, and provides a reliable, public source of youth tobacco use data. NYTS surveys children in both high school and middle school, providing unique data for younger students who are not included in other national surveys. This extensive information on how and why young people use tobacco and nicotine products enables Attorneys General to focus their resources on the most effective policies

and enforcement measures to address the constantly evolving retail market. Additionally, NYTS data has been crucial in alerting the States to emerging tobacco products and was the first national indicator of the youth e-cigarette epidemic.

It is essential that Attorneys General have continued access to data collected in the rigorous fashion employed by NYTS to inform our efforts as we work to reduce youth tobacco use. We appreciate the opportunity to respond to the CDC's request for comments and look forward to seeing future NYTS reports. Thank you for your ongoing work on this important survey.

Respectfully submitted,



William Tong
Connecticut Attorney General



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Dave Sunday
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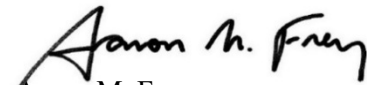
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