

December 18, 2017

**Caryn Cohen**  
**Office of Science**  
**Center for Tobacco Products**  
**Food and Drug Administration**  
**Document Control Center, Bldg. 71, Rm. G335**  
**10903 New Hampshire Ave.**  
**Silver Spring, MD 20993-0002**

RE: Docket No. FDA-2017-D-3001-0002, Modified Risk Tobacco Product Applications: Applications for iQOS System With Marlboro Heatsticks, iQOS System With Marlboro Smooth Menthol Heatsticks, and iQOS System With Marlboro Fresh Menthol Heatsticks

To Whom It May Concern:

My name is Victoria Vasconcellos, I am the owner of Cignot Inc a vapor product retailer.

I had smoked for 33 years when I first discovered vaping (not yet a real word). After multiple failed quit attempts and using a myriad of FDA sanctioned cessation methods; a small pen-like device called the "Joyetech 510" was the tool I needed to successfully and permanently transition away from combustible cigarettes.

I was dismayed to find that my purchases from Joyetech, a manufacturer located in China, were at risk of being seized at the border by the FDA who, at that time, considered them to be an "unregulated medical device".

Cignot Inc, an Illinois Corporation, was incorporated on September 9, 2009 with the goal of absorbing the risk of importing these devices because it was my belief that every smoker had the right to know this life changing option existed. Since then, I have personally guided tens of thousands of smokers through the transition to no longer smoking.

The organic growth of this industry was exponential as word spread from one 'soon to be ex-smoker' to the next. Truly a disruptive technology, this swift growth was and continues to be, upsetting to the status quo as smokers become vapers and revenue streams based on tobacco sales are interrupted.

Public health messaging to date has been over-zealously precautionary (considering a smokers prospect of a long and healthy life) and the result has been a confused and often misguided smoking public. Government at

all levels, and the FDA itself, have contributed to the confusion as vaping products continue to be forced into frameworks built for deadly combustible cigarettes as opposed to creating new regulatory schemes for them as harm reducing alternatives.

Unfortunately, those most impacted are those that perhaps due to age, lack of technical prowess or financial constraints have limited access to an unbiased analysis of vaping products and risk associated with using them as opposed to smoking cigarettes.

Still in its infancy, the vaping industry lacks the coordination and funding to pursue Modified Risk Tobacco Product applications and successfully market vapor products with reduced harm claims. PMI on the other hand, has the resources to do so and I fully support the FDA approving the MRTP applications for IQOS.

For a myriad of individuals including:

- those that may be hesitant to try an alternative because they have been convinced by mainstream media that the harms are equal
- those who simply have no desire to change what they have been doing for decades
- those who simply cannot find the satisfaction they need from vaping or smokeless tobacco products,

heat not burn products may be the 'just what the doctor ordered' to transition them away from deadly combustible products to a less harmful alternative.

Anyone with an interest in ending the scourge caused by cigarette smoking should welcome this product and support FDA approval of these MRTP applications. It is imperative that the public have accurate information so that we can make sound choices about our personal health. For millions of us, the truth about tobacco harm reduction products is central to that goal.

Sincerely,

Victoria Vasconcellos  
Cignot Inc