



**REESE, YEATMAN & ASSOCIATES, INC.**



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November 29, 2017

The Honorable Scott Gottlieb, M.D.  
Commissioner  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

ATTN: Division of Dockets Management (HFA-305), Docket ID: FDA-2017-D-3001

Dear Commissioner Gottlieb,

Pursuant to FDA's request for public comments on the FDA application of "heat-not-burn" modified risk tobacco products ([www.regulations.gov/document?D=FDA-2017-D-3001-0002](http://www.regulations.gov/document?D=FDA-2017-D-3001-0002)). I am writing to bring your attention to the prevalence of residential fires caused by smoking.

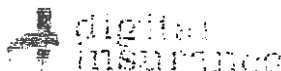
As an insurance industry professional, I see regular evidence that smoking tobacco in the home (as well as the car) increases the risk of accident, injury, or death. In 2011, U.S. fire departments responded to an estimated 90,000 smoking-material fires in the U.S. These fires resulted in an estimated 540 civilian deaths, 1,640 civilian injuries and \$621 million in direct property damage.

As you can see from the attached print-out from the 2017 Civilian Fire Fatalities Incident Report collected by the United States Fire Association, there have already been 71 individuals who died in residential fires caused by smoking so far this year. Three of these incidents appear to involve elderly residents in long-term care facilities, where personal mobility can be major factor in responding to a fire emergency.

<sup>1</sup> [www.nfpa.org/News-and-Research/Fire-statistics-and-reports/Fire-statistics/Fire-causes/Smoking-Materials](http://www.nfpa.org/News-and-Research/Fire-statistics-and-reports/Fire-statistics/Fire-causes/Smoking-Materials)

<sup>2</sup> <https://apps.usfa.fema.gov/civilian-fatalities/incident/reportList>

In Partnership With

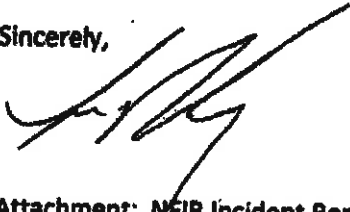


That's why fire safety advocates and the "Coalition for Fire-Safe Cigarettes" worked to implement reduced ignition propensity ("fire-safe") cigarette laws in all 50 states over the last decade. According to the National Fire Protection Association, "fire safe cigarettes appear to be the principal reason for a 30% decline in smoking-material fire deaths from 2003-2011."<sup>3</sup>

On May 24, 2017 FDA accepted a Modified Risk Tobacco Product Application for substantive scientific review of a "heat-not-burn" tobacco product in order to promote and protect public health and safety. Individuals should not smoke because smoking is dangerous to health. I have no comment on the clinical merits of this application.

However, the FDA's "new direction" calls for leveraging new technology to provide alternatives for adults who want access to nicotine, but want to quit cigarettes.<sup>4</sup> And for those individuals who might choose to stop using conventional combustible cigarettes and use noncombustible forms of nicotine delivery instead, a noticeable reduction in fire-related hazards would be a valuable achievement.

Sincerely,

A handwritten signature in black ink, appearing to be the name of a representative of the FDA, written in a cursive style.

Attachment: NFIR Incident Report - 2017 Residential Fire Fatalities from Smoking.

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<sup>3</sup> [www.nfpa.org/News-and-Research/Fire-statistics-and-reports/Fire-statistics/Fire-causes/Smoking-Materials](http://www.nfpa.org/News-and-Research/Fire-statistics-and-reports/Fire-statistics/Fire-causes/Smoking-Materials)

<sup>4</sup> <https://www.fda.gov/NewsEvents/Speeches/ucm581314.htm>

2017 to date <https://apps.usfa.fema.gov/civilian-fatalities/incident/reportlist>

Date	State	City	Cause	Description	Gender	Age
11/13/2017	NC	High Point	Smoking	A 64 y.o. man died in an apartment fire	Male	64
11/09/2017	MD	Lansdowne	Smoking	A 67 y.o. woman died in a fire. Her 71 y.o. husband died at the hosp	Female	67
11/09/2017	MD	Lansdowne	Smoking	A 67 y.o. woman died in a fire. Her 71 y.o. husband died at the hosp	Male	71
11/04/2017	NY	Batavia	Smoking	A 66 y.o. man died in a motel room fire.	Male	66
10/21/2017	MD	Elkton	Smoking	A 63 y.o. man died in an apartment fire.	Male	63
10/21/2017	DC	Washington	Smoking	A 64 y.o. woman died in an apartment fire	Female	64
09/03/2017	PA	Harrisburg	Smoking	A pregnant 27 y.o., a 5 y.o. boy and a 2 y.o. boy died in a house fire	Female	5
09/03/2017	PA	Harrisburg	Smoking	A pregnant 27 y.o. woman, a 5 y.o. boy and a 2 y.o. boy died in a ho	Female	27
09/03/2017	PA	Harrisburg	Smoking	A pregnant 27 y.o. woman, a 5 y.o. boy and a 2 y.o. boy died in a ho	Male	2
08/14/2017	MD	Stevensville	Smoking	A 77 y.o. man and his 76 y.o. wife died in a house fire.	Male	77
08/14/2017	MD	Stevensville	Smoking	A 77 y.o. man and his 76 y.o. wife died in a house fire.	Female	76
08/12/2017	TX	Corpus Christi	Smoking	A 68 y.o. woman died in a house fire.	Female	68
08/12/2017	MT	Clinton	Smoking	A 60 y.o. man died in a cabin fire	Male	60
08/09/2017	WV	Charleston	Smoking	A 61 y.o. female died while smoking a cigarette using home oxygen	Female	61
07/31/2017	GA	LaGrange	Smoking	An 80 y.o. woman died in a house fire	Female	80
07/29/2017	GA	Griffin (Spalding County)	Smoking	A 44 y.o. woman died in the house fire on 7/29/17. The 6 y.o. boy di	Female	6
07/29/2017	GA	Griffin (Spalding County)	Smoking	A 44 y.o. woman died in the house fire on 7/29/17. The 6 y.o. boy di	Female	44
07/29/2017	NY	Town of Chester	Smoking	A 32 y.o. man died in an apartment fire.	Male	32
07/08/2017	WA	Pekin	Smoking	A man in his 70's died from severe burns from fire in his mobile home	Male	70
06/20/2017	IN	Petersburg	Smoking	A 58 y.o. woman with disabilities died in an apartment fire.	Female	58
06/13/2017	FL	Zionsville (Boone County)	Smoking	A 67 y.o. woman died in a house fire.	Female	67
06/13/2017	FL	Tampa	Smoking	A 72 y.o. woman died in a house fire.	Female	72
06/06/2017	AL	Walker County	Smoking	A 59 y.o. man died in a house fire	Male	59
05/30/2017	CA	Long Beach	Smoking	A man died in an apartment fire.	Male	Unknown
05/19/2017	MO	Kansas City	Smoking	One person died in a house fire.	Unknown	Unknown
05/18/2017	MO	St. Charles	Smoking	An 83 y.o. woman died after catching on fire at a nursing home	Female	83
05/15/2017	PA	Pittsburgh	Smoking	A 75 y.o. woman died in an apartment fire.	Female	75
05/13/2017	IL	Lincoln	Smoking	A 65 y.o. woman died in a mobile home fire.	Female	65
05/13/2017	MO	St. Charles	Smoking	An 83 y.o. woman with disabilities died in a fire at a nursing home	Female	83
05/10/2017	TX	Corpus Christi	Smoking	A 72 y.o. man died in a house fire.	Male	72
05/09/2017	IL	Oak Lawn	Smoking	A 64 y.o. woman died in a trailer fire	Female	64
05/08/2017	IN	Columbus	Smoking	A 59 y.o. woman died in an apartment fire.	Female	59
05/07/2017	MI	Pinckney Township	Smoking	A 64 y.o. man died in a house fire.	Male	64
05/05/2017	NY	Greenwich Village	Smoking	A 79 y.o. man died in an apartment fire.	Male	79

04/20/2017	MA	Marlboro (Marlborough)	Smoking	A woman in her fifties died in a duplex fire.	Female	50
04/18/2017	IN	Bedford	Smoking	A 66 y.o. disabled woman died in a house fire.	Female	66
04/10/2017	TN	Knoxville	Smoking	A 3 y.o. boy died in an apartment fire.	Male	3
04/08/2017	IL	Pana (Christian County)	Smoking	A 43 y.o. man died in a house fire.	Male	43
03/15/2017	MN	Moorhead	Smoking	A 58 y.o. woman died in an apartment fire.	Female	58
03/13/2017	MN	Roseau	Smoking	A 51 y.o. man died in a house fire.	Male	51
03/10/2017	MD	Pasadena	Smoking	A 92 y.o. man died in a house fire.	Male	92
03/04/2017	IL	Chicago	Smoking	An 83 y.o. man died in a house fire.	Male	83
03/03/2017	NC	Brunswick County	Smoking	A woman died in a fire at an assisted living facility.	Female	Unknown
02/28/2017	TN	Cleveland	Smoking	A 72 y.o. woman died in a house fire.	Female	72
02/23/2017	CT	Westbrook	Smoking	A man died in an apartment fire.	Male	Unknown
02/20/2017	NY	New York City	Smoking	An 87 y.o. woman died in a high-rise fire.	Female	87
02/14/2017	NJ	Riverton	Smoking	A 71 y.o. woman died in a house fire.	Female	71
02/14/2017	MA	Toms River	Smoking	A 64 y.o. woman died in a house fire.	Female	64
02/14/2017	MA	Malden	Smoking	A man and an elderly woman died in a house fire.	Male	Unknown
02/12/2017	MA	Malden	Smoking	A man and an elderly woman died in a house fire.	Female	Unknown
02/12/2017	MA	Quincy	Smoking	A 67 y.o. woman and a 19 y.o. man died in a house fire.	Female	67
02/12/2017	MA	Quincy	Smoking	A 64 y.o. woman died in a house fire.	Female	64
02/09/2017	NY	Staten Island	Smoking	A 69 y.o. man died in a house fire.	Male	69
02/06/2017	PA	Clarks Summit (Lackawann	Smoking	A 77 y.o. woman died in an apartment fire.	Female	77
01/31/2017	MD	Havertill	Smoking	A 68 y.o. man died in an apartment fire.	Male	68
01/30/2017	OR	Junction City	Smoking	A man and woman died in a house fire.	Male	56
01/29/2017	OR	Junction City	Smoking	A man and woman died in a house fire.	Female	Unknown
01/29/2017	FL	Pensacola	Smoking	A man and a woman died in a house fire.	Male	Unknown
01/29/2017	FL	Pensacola	Smoking	A man and a woman died in a house fire.	Female	Unknown
01/27/2017	MD	Lubbock	Smoking	A 67 y.o. woman died in a house fire.	Female	67
01/18/2017	IN	Baltimore County	Smoking	A 67 y.o. man died in a mobile home fire.	Male	67
01/10/2017	AK	Anderson	Smoking	An 80 y.o. woman died Thursday from injuries in a trailer home fire.	Female	80
01/08/2017	NV	Ketchikan	Smoking	A 49 y.o. man died in an apartment fire.	Male	49
01/05/2017	WA	Reno	Smoking	A man died in an apartment fire.	Male	Unknown
01/04/2017	NC	Seattle	Smoking	A man died in a camper fire.	Male	Unknown
01/04/2017	IN	Mebane (Orange County)	Smoking	A 39 y.o. man died in a camper fire.	Male	39
01/04/2017	IN	Lafayette	Smoking	A 55 y.o. man died Thursday when pulled from a mobile home fire on Male	Male	55