

Technical Project Lead (TPL) Review of SE Reports

New Tobacco Products Subject of this Review		
	SE0016593, SE0016743, SE0016744, SE0016745,	
Submission tracking numbers (STNs)	SE0016897, SE0017129, SE0017144, SE0017242,	
Submission reacking numbers (51143)	SE0017243, SE0017350, SE0017354, SE0017688,	
	SE0017703, SE0017704	
Common Attributes		
Submission date	May 8, 2020, June 26, 2020, July 27, 2020, August 10, 2020, August 17, 2020, August 20, 2020, August 28, 2020 ¹	
Receipt date	May 8, 2020, June 26, 2020, July 27, 2020, August 10, 2020, August 17, 2020, August 20, 2020, August 28, 2020	
Applicant	Philip Morris USA Inc.	
Product manufacturer	Philip Morris USA Inc.	
Application type	Regular	
Product category	Cigarettes	
Product subcategory	Combusted, Filtered	
Cross-Referenced Submissions		
SE0016743 - SE0016745, SE0016897, SE0017129, SE0017144, SE0017242- SE0017243, SE0017350, SE0017354	(b) (4)	
Supporting FDA Memoranda Relied Upon in this	Review	
SE0016593, SE0016743, SE0016744, SE0016745, SE0016897, SE0017242, SE0017243, SE0017350, SE0017354	Review of Saccharides as Tobacco Ingredients: Effects on Smoke Chemistry (July, 2017) (b) (4)	
SE0016593, SE0016743, SE0016744, SE0016745, SE0016897, SE0017129, SE0017144, SE0017242, SE0017243, SE0017350, SE0017354	Addendum to Equivalence Testing for SE Evaluations Memo (April 16, 2019)	
SE0017242, SE0017243, SE0017350, SE0017354	Distribution of Menthol in Cigarettes and Smoke Transfer; final signature date (February 12, 2014)	
Recommendation		
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Issue Substantially Equivalent (SE) order(s) for the new tobacco product(s) subject of this review.

Technical Project Lead (TPL):

Melissa Mcculloch -S Mcculloch -S

Date: 2020.11.30 08:53:35 -05'00'

Melissa McCulloch, Ph.D.

Senior Regulatory Scientist, Division of Product Science Office of Science

¹ For submission and receipt dates refer to Appendix A

Signatory Decision:

Concur with TPL recommendation and basis of recommendation

Digitally signed by Todd L. Cecil -S Date: 2020.11.30 16:17:42 -05'00'

Todd L. Cecil, Ph.D. Deputy Director Office of Science

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1. BACKGROUND

1.1. NEW AND PREDICATE TOBACCO PRODUCTS

The applicant submitted information for the new and predicate tobacco products listed in detail in the Appendix.

1.2. REGULATORY ACTIVITY

See Appendices for tobacco products and amendments.

1.3. SCOPE OF REVIEW

This review captures all compliance and scientific reviews completed for the new tobacco products subject of this review.

Discipline	Cycle 1: Reviewer(s)	Review Date
regulatory	Ryan Nguy	05/15/2020
	Samuel Motto	07/08/2020
	Rida Tariq	7/31/2020, 08/18/2020, 8/27/2020
	Iqra Javid	08/24/2020
	Adaku Otuonye	09/04/2020
chemistry	Scott Wasdo	10/30/2020
engineering	Fawaz Akik	10/28/2020
toxicology	Daniel Beury	10/28/2020
environmental science	Gregory Gagliano	10/28/2020

Table 1. Disciplines reviewed

2. COMPLIANCE REVIEW

The predicate tobacco products in SE0016593, SE0016743, SE0016744, SE0016745, SE0016897, SE0017129, SE0017144, SE0017242, SE0017243, SE0017350, SE0017354, SE0017688, SE0017703 and SE0017704 were determined to be substantially equivalent by FDA under SE0015427, SE0015501, SE0015502, SE0015503, SE0007204, SE0014932, SE0014933, SE0014444, SE0014444, SE0015298, SE0015300, SE0015617, SE0015633, SE0015634, respectively. Therefore, the predicate tobacco products are eligible predicate tobacco products.

OCE also completed a review to determine whether the new tobacco products are in compliance with the Federal Food, Drug, and Cosmetic Act (FD&C Act) (see section 910(a)(2)(A)(i)(II) of the FD&C Act). The OCE review dated November 12, 2020, concludes that the new tobacco products are in compliance with the FD&C Act.

3. SCIENTIFIC REVIEW

Scientific reviews were completed by the Office of Science (OS) for the following disciplines:

3.1. CHEMISTRY

The final chemistry review concludes that the new tobacco products have different characteristics compared to the corresponding predicate tobacco products, but the differences do not cause the new tobacco products to raise different questions of public health from a chemistry perspective.

The applicant provided certification statements asserting that the new and corresponding tobacco products were identical in many respects. These certification statements are discussed in greater detail in Section 2.1 of the chemistry review.

All new tobacco products use tobacco blends that are identical to or similar to the tobacco blends used in the corresponding predicate tobacco products. Furthermore, the quantity of tobacco filler used in all new tobacco products is equal to or lower than the quantity of tobacco filler used in the corresponding predicate products. The new tobacco products in SE0017688, SE0017703 and SE0017704 use a slightly shorter (~1%) tobacco rod than the corresponding predicate tobacco products. Since this results in the new tobacco product combusting a smaller mass of the same tobacco and cigarette paper during product use, these differences do not cause the new tobacco products in these SE reports to raise different questions of public health from a chemistry perspective.

Small differences between the non-tobacco ingredients used in the new and corresponding predicate product tobacco blends of SE0017242, SE0017243, SE0017350 and SE0017354 were noted. The new tobacco products contained higher quantities or (b) (4)

The new tobacco products in SE0016593, SE0016743, SE0016744, SE0016745, SE0016897, SE0017242, SE0017243, SE0017350 and SE0017354 use different cigarette papers than the corresponding predicate products. The new tobacco product papers use different banding materials (b) (4) have slightly higher quantities of (b) (4) have slightly higher quantities of (b) (4)

ISO and CI smoke yields of harmful and potentially harmful constituents (HPHCs) related to the use or combustion of these ingredients (e.g. acetaldehyde, acrolein, formaldehyde, benzene and B[a]P) were measured. The smoke yields of each analyte generated by all new and corresponding predicate products were assessed for equivalence using a two one sided t-test (TOST) approach combined with a Horwitz-Thompson estimation to identify expected analytical variability and were determined to be analytically equivalent. The difference in burn modifiers may affect tar, nicotine and carbon monoxide (TNCO) yields, but the applicant provided test data indicating that TNCO yields from the new and corresponding predicate tobacco products were analytically equivalent (using TOST) when measured under both ISO and CI regimens. The new products described in SE0017129, SE0017144, SE0017242, SE0017243, SE0017350 and SE0017354 use a seam adhesive that contains (b) (4)

which are not present in the seam adhesive of the corresponding predicate tobacco products. (b) (4) are reported to produce benzene, acetaldehyde and acrolein when combusted. Smoke yields of benzene, acetaldehyde and acrolein were measured in the new and corresponding predicate tobacco products and were analytically equivalent (using TOST). All ingredient differences between the new and corresponding predicate products are small and not expected to impact smoke chemistry. Further, the applicant provided HPHC data under both ISO and CI regiments and none of the ingredient differences produced a measurable effect on the smoke chemistry of the new and corresponding predicate tobacco products. Based on the discussion in Section 2.3 of the chemistry review, all differences between the new and corresponding grandfathered products. Therefore, the ingredient differences between the new and corresponding predicate tobacco products do not do not cause the new tobacco products to raise different questions of public health from a chemistry perspective. The applicant identified a number of minor differences between the tipping paper, tipping inks, extenders, or tipping adhesives used in the new and corresponding tobacco in SE0016897, SE0017242, SE0017243, SE0017350, and SE0017354. Since the none of these materials are combusted during use and since none of these differences are expected to have a meaningful affect on the relative performance of the filter, these differences do not cause the new tobacco product to different questions of public health from a chemistry perspective.

The new tobacco product in SE0016897 uses a filter that is 40% smaller than that used in predicate tobacco product. Additionally, there were changes in the cigarette length, tobacco filler mass, base paper basis weight, base paper porosity, filter denier, per filament, filter density, filter pressure drop, filter length, filter ventilation, and tipping paper length between new and predicate tobacco product in SE0016897. These differences could cause the new tobacco product filter to be less efficient and have less ventilation than the predicate tobacco product to have higher smoke yields of TNCO. The test data provided applicant indicated that TNCO and other HPHC yields generated by the new and predicate products were analytically equivalent. Since new product design parameter differences did not have a measurable affect the relative smoke chemistry of the new and predicate tobacco product, these differences do not cause the cause the new tobacco product to different questions of public health from a chemistry perspective.

Therefore, the differences in characteristics between the new and corresponding predicate tobacco products do not cause the new tobacco products to raise different questions of public health from a chemistry perspective.

3.2. ENGINEERING

The final engineering review concludes that the new tobacco products have different characteristics compared to the corresponding predicate tobacco products, but the differences do not cause the new tobacco products to raise different questions of public health from an engineering perspective.

The applicant provided certification statements asserting that the new and corresponding tobacco products were identical in many respects. These certification statements are discussed in greater detail in Section 2.1 of the engineering review. In SE Reports SE0016593, SE0016743, SE0016744, SE0016745, SE0017129, SE0017144, SE0017688, SE0017703, and SE0017704, the engineering design parameters not covered by the certification statements were evaluated between new and corresponding predicate tobacco products and between new and grandfathered tobacco products. For SE0016897, SE0017242, SE0017243, SE0017350, and SE0017354, the differences in each of the necessary design parameters between new and corresponding predicate tobacco products and grandfathered tobacco products were evaluated.

According to the information provided by the applicant, for SE0016897, the changes in the cigarette length, tobacco filler mass, base paper basis weight, base paper porosity, filter denier, per filament, filter density, filter pressure drop, filter length, filter ventilation, and tipping paper length between new and predicate tobacco products are deferred to chemistry for evaluation of TNCO. Furthermore, for SE0016897, changes in the cigarette length, tobacco filler mass, filter

denier per filament, filter pressure drop, filter length, and tipping paper length between new and grandfathered tobacco products are deferred to chemistry for evaluation of TNCO.

All other necessary engineering design parameters are either identical or have minimal differences between new and predicate tobacco products and between new and grandfathered tobacco products. The minimal differences in the design parameters are not likely to cause measurable effects on the mainstream smoke yields, and therefore, they do not cause the new tobacco products to raise different questions of public health.

Therefore, the differences in characteristics between the new and corresponding predicate tobacco products do not cause the new tobacco products to raise different questions of public health from an engineering perspective.

3.3. TOXICOLOGY

The final toxicology review concludes that the new tobacco products have different characteristics compared to the corresponding predicate tobacco products, but the differences do not cause the new tobacco products to raise different questions of public health from a toxicology perspective.

In SE0016593, SE0016743², SE0016744, and SE0016745, there were higher ingredient levels and/or ingredient additions in the cigarette paper of the new tobacco products compared to the corresponding predicate tobacco products. In SE0016897 there were higher ingredient levels and/or ingredient additions in the cigarette paper and lower levels of tobacco and ingredients other than tobacco in the new tobacco product compared to the predicate tobacco product. In SE0017242, SE0017243, SE0017350, and SE0017354, there were higher ingredient levels and/or ingredient additions in ingredients other tobacco and lower levels of tobacco in the new tobacco products compared to the corresponding predicate tobacco products. The applicant reported TNCO and select HPHC yields from the new and corresponding predicate tobacco products generated under both ISO and CI smoking regimens that were either analytically equivalent or analytically inequivalent but lower. Therefore, the changes in ingredients do not raise different questions of public health from a toxicology perspective. In SE0017129 and SE0017144, there were higher ingredient levels and ingredient additions in the cigarette seam adhesive of the new tobacco products compared to the corresponding predicate tobacco products. The applicant reported analytically equivalent HPHC yields generated under ISO and CI regimens from test cigarette 1 and 2. The applicant states that the cigarette seam adhesive in test cigarette 1 is identical to the seam adhesive in the new tobacco products, including the complex defoamer addition, whereas; the seam adhesive in test cigarette 2 is identical to the seam adhesive in the predicate tobacco products. Since the only reported change in the combusted portion of the cigarette between the new and predicate tobacco products is the cigarette seam adhesive, and since test cigarettes 1 and 2 are reportedly identical except for the seam adhesive corresponding to either the new or predicate tobacco products, the HPHC yields from test cigarette 1 and 2 suggest that the different seam adhesive is unlikely to affect HPHC yields in the new tobacco products compared to the corresponding predicate tobacco products. Therefore, the higher ingredient levels and ingredient additions in the cigarette seam adhesive are unlikely to raise different questions of public health from a toxicology perspective. In SE0017688, SE0017703,

² Note, in the final toxicology review, this STN is incorrectly captured as SE001673. The correct STN is SE0016743.

and SE0017704, there were lower levels of ingredients other than tobacco in the new tobacco products compared to the corresponding predicate tobacco products. Lower levels of ingredients in the combustible portion of the cigarette are not of toxicological concern.

Therefore, the differences in characteristics between the new and corresponding predicate tobacco products do not cause the new tobacco products to raise different questions of public health from a toxicology perspective.

4. ENVIRONMENTAL DECISION

A finding of no significant impact (FONSI) was signed by Luis Valerio, Ph.D. on November 06, 2020. The FONSI was supported by an environmental assessment prepared by FDA onNovember 06, 2020.

5. CONCLUSION AND RECOMMENDATION

The new and the predicate tobacco products have differences in the following characteristics:

- SE0016593
 - Ingredient changes in cigarette paper: (b) (4) $(\uparrow^{(b)})^{(4)}$ mg, or $\uparrow 5\%$; (b) (4) ($\uparrow^{(b)})^{(4)}$ mg addition); (b) (4) $(\uparrow^{(b)})^{(4)}$ mg addition); (b) (4) ($\uparrow^{(b)})^{(4)}$ mg, or $\uparrow 104\%$); (b) (4) $(\uparrow^{(b)})^{(4)}$ mg addition); (b) (4) $(\uparrow^{(b)})^{(4)}$ mg addition)
- SE0016743
- SE0016744
- SE0016745
 - Ingredient changes in cigarette paper: (b) (4) $(\uparrow^{(1)})^{(1)}$ mg, or $\uparrow 5\%$); (b) (4) (b) (4) $(\uparrow^{(1)})^{(1)}$ mg addition); (b) (4) $(\uparrow^{(1)})^{(1)}$ mg addition); (b) (4) $(\uparrow^{(1)})^{(1)}$ mg addition); (b) (4)
 - mg addition)
- SE0016897
 - Design parameter changes: cigarette length decrease $(\downarrow 20\%)$; (b) (4) mass decrease $(\downarrow 10\%)$; base paper basis weight increase $(\uparrow 7\%)$; base paper porosity increase $(\uparrow 82\%)$; filter denier per filament decrease $(\downarrow 21\%)$; filter density increase $(\uparrow 7\%)$; filter pressure drop decrease $(\downarrow 16\%)$; filter length decrease $(\downarrow 40\%)$; filter ventilation decrease $(\downarrow 6\%)$; tipping paper length decrease $(\downarrow 33\%)$

 - Minor ingredients changes in the noncombusted components: filter tow, filter anchor adhesive, tipping adhesive, base tipping paper, tipping ink

- Lower levels of total tobacco, ingredients added to tobacco, and ingredients in cigarette seam adhesive
- SE0017129, SE0017144
 - Ingredient changes in the seam adhesive: (b) (4) (^{(b) (4)} mg addition);
 (b) (4) (^{(b) (4)} mg addition); ^{(b) (5) Deliberative Process priv} (multiple ingredient additions)
 - Minor ingredients changes in the tipping adhesive
- SE0017242, SE0017243
 - Changes in ingredients added to tobacco: (b) (4) (^{b) (4)} mg addition); (b) (4) (b) (4) ($\uparrow^{(b) (4)}$ mg, or $\uparrow^{(13\%)}$; (b) (4) ($\uparrow^{(b) (4)}$ mg, or $\uparrow^{(13\%)}$; (b) (4) ($\uparrow^{(b) (4)}$ mg, or $\uparrow^{(13\%)}$; (b) (4) ($\uparrow^{(b) (4)}$ mg, or $\uparrow^{(13\%)}$; (b) (4)
 - Ingredient changes in cigarette paper: (b) (4) ($\uparrow^{(b)}$ (4) mg, or \uparrow 2%); (b) (4) ($\uparrow^{(b)}$ (4) mg addition); (b) (4) (b) (4) ($\uparrow^{(b)}$ (4) mg addition); (b) (4) ($\uparrow^{(b)}$ (4) mg addition);
 - Ingredient changes in the seam adhesive: (b) (4) (b) (4) mg addition);
 (b) (4) (b) (4) mg addition);
 (b) (4) (b) (4) mg addition);
 - Minor ingredient changes in the tipping adhesive and base tipping paper.
 - Decrease in total tobacco
- SE0017350, SE0017354
 - Changes in ingredients added to tobacco: (b) (4) ($\uparrow^{(b)}$ (4) mg, or \uparrow 10293%); (b) (4) ($\uparrow^{(b)}$ (4) mg, or \uparrow 12%)
 - Ingredient changes in cigarette paper: (b) (4) ($\uparrow^{(b)}$ (4) mg, or \uparrow 2%); (b) (4) ($\uparrow^{(b)}$ (4) ($\uparrow^{(b)}$ (4) mg, or \uparrow 84%);
 - Ingredient changes in the seam adhesive: (b) (4)
 addition); (b) (4)
 (^(b) (4) mg, or ^(b) (4) etin (0.065 mg addition);
 (^(b) (6) Deliberative Process prive (multiple ingredient additions)
 - Ingredient changes in the filter seam adhesive and tipping ink
 - Decrease in total tobacco
- SE0017688, SE0017703, SE0017704
 - o Lower levels of ingredients added to tobacco
 - Lower levels of ingredients added to cigarette paper
 - Lower levels of total tobacco

I concur with the conclusions of all the scientific reviews that the applicant has demonstrated that these differences in characteristics do not cause the new tobacco products to raise different questions of public health as described in Section 3.1-3.3 above. In all SE Reports, the new tobacco products have ingredient differences when compared to the corresponding predicate tobacco products. Most of the ingredient changes are minor and not expected to impact HPHC smoke yields. Additionally, there are several design parameter differences in SE0016897 that could impact smoke yields of TNCO. The applicant provided HPHC data and all HPHCs were either analytically equivalent or analytically inequivalent but lower in the new tobacco products compared with the corresponding predicate tobacco products. Therefore, the differences in characteristics between the new and corresponding predicate products do not cause the new tobacco products to raise different questions of public health.

All the predicate tobacco products were previously determined to be substantially equivalent by FDA, as identified on the cover page of this review. Where an applicant supports a showing of SE by comparing the new tobacco product to a tobacco product that FDA previously found SE, in order to issue an SE order, FDA must find that the new tobacco product is substantially equivalent to a

tobacco product commercially marketed in the United States as of February 15, 2007 (see section 910(a)(2)(A)(i)(I) of the FD&C Act). No differences in characteristics between the new product and the product commercially marketed in the United States as of February 15, 2007, raise different questions of public health.

The new tobacco products are currently in compliance with the FD&C Act. I concur with these reviews and recommend that SE order letters be issued. FDA examined the environmental effects of finding these new tobacco products substantially equivalent and made a finding of no significant impact.

6. APPENDICES

Common Attributes of SE Reports		
Submission date	Мау 8, 2020	
Receipt date	May 8, 2020	
Product manufacturer	Philip Morris USA Inc.	
Product category	Cigarettes	
Product subcategory	Combusted, Filtered	
Attributes	New Tobacco Product	Predicate Tobacco Product
STN	SE0016593	SE0015427
Product name ³	Benson & Hedges 100's Box	Benson & Hedges 100's Box
Eligibility status	Not Applicable (N/A)	Previously Found SE
Package type	Hard Pack	Hard Pack
Package quantity	20 Cigarettes	20 Cigarettes
Characterizing flavor	None	None
Length	98 millimeters (mm)	98 m m
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	26%	26%

Appendix A. New and predicate tobacco products

³ Brand/sub-brand er other commercial name used in commercial distribution.

⁴ The applicant submitted the circumference which allowed for a calculation of diameter.

Common Attributes of S	SE Reports	
Submission date	June 26, 2020	
Receipt date	June 26, 2020	
Product manufacturer	Philip Morris USA Inc.	
Product category	Cigarettes	
Product subcategory	Combusted, Filtered	
Attributes	New Tobacco Product	Predicate Tobacco Product
STN	SE0016743	SE0015501
Product name ³	Virginia Slims Box	Virginia Slims Box
Eligibility status	N/A	Previously Found SE
Package type	Hard Pack	Hard Pack
Package quantity	20 Cigarettes	20 Cigarettes
Characterizing flavor	None	None
Length	98 mm	98 mm
Diameter ⁴	7.32 mm	7.32 mm
Ventilation	23%	23%
STN	SE0016744	SE0015502
Product name ³	Marlboro Menthol Slate Box	Marlboro Menthol Slate Box
Eligibility status	N/A	Previously Found SE
Package type	Hard Pack	Hard Pack
Package quantity	20 Cigarettes	20 Cigarettes
Characterizing flavor	Menthol	Menthol
Length	83 mm	83 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	23%	23%
STN	SE0016745	SE0015503
Product name ³	Benson & Hedges 100's Menthol Box	Benson & Hedges 100's Menthol Box
Eligibility status	N/A	Previously Found SE
Package type	Hard Pack	Hard Pack
Package quantity	20 Cigarettes	20 Cigarettes
Characterizing flavor	Menthol	Menthol
Length	98 mm	98 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	26%	26%

Common Attributes of SE Reports			
Submission date	July 27, 2020		
Receipt date	July 27, 2020	July 27, 2020	
Product manufacturer	Philip Morris USA Inc.		
Product category	Cigarettes		
Product subcategory	Combusted, Filtered		
Attributes	New Tobacco Product	Predicate Tobacco Product	
STN	SE0016897	SE0007204	
Product name ³	Marlboro Southern Cut Box	Marlboro Southern Cut 100's Box	
Eligibility status	N/A	Previously Found SE	
Package type	Hard Pack	Hard Pack	
Package quantity	20 Cigarettes	20 Cigarettes	
Characterizing flavor	None	None	
Length	79.0 mm	98.5 mm	
Diameter ⁴	7.89 mm	7.89 mm	
Ventilation	12.0%	18.0%	
Additional property	N/A	Cigarette Paper 1	

Common Attributes of S	SE Reports	
Submission date	August 10, 2020	
Receipt date	August 10, 2020	
Product manufacturer	Philip Morris USA Inc.	
Product category	Cigarettes	
Product subcategory	Combusted, Filtered	
Attributes	New Tobacco Product	Predicate Tobacco Product
STN	SE0017129	SE0014932
Product name ³	Marlboro Menthol Green Pack 72's	Marlboro Menthol Green Pack 72's
	Вох	Вох
Eligibility status	N/A	Previously Found SE
Package type	Hard Pack	Hard Pack
Pack age quantity	20 Cigarettes	20 Cigarettes
Character izing flavor	Menthol	Menthol
Length	72 mm	72 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	12.0%	12.0%
Additional property	Tipping Paper 1	Tipping Paper 1
STN	SE0017144	SE0014933
Product name ³	Marlboro Menthol Green Pack 72's	Marlboro Menthol Green Pack 72' s
	Box	Вох
Eligibility status	N/A	Previously Found SE
Package type	Hard Pack	Hard Pack
Pack age quantity	20 Cigarettes	20 Cigarettes
Character izing flavor	Menthol	Menthol
Length	72 mm	72 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	12.0%	12.0%
Additional property	Tipping Paper 2	Tipping Paper 2

Common Attributes of S	SE Reports	
Submission date	August 17, 2020	
Receipt date	August 17, 2020	
Product manufacturer	Philip Morris USA Inc.	
Product category	Cigarettes	
Product subcategory	Combusted, Filtered	
Attributes	New Tobacco Product	Predicate Tobacco Product
STN	SE0017242	SE0014444
Product name ³	Marlboro Menthol Gold Pack 100's	Marlboro Menthol Gold Pack 100's
	Box	Вох
Eligibility status	N/A	Previously Found SE
Pack age type	Hard Pack	Hard Pack
Pack age quantity	20 Cigarettes	20 Cigarettes
Character izing flavor	Mentho	Menthol
Length	98.5 mm	98.5 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	31.0%	33.0%
Additional property	Tipping Paper 1	N/A
STN	SE0017243	SE0014444
Product name ³	Marlboro Menthol Gold Pack 100's	Marlboro Menthol Gold Pack 100's
	Box	Box
Eligibility status	N/A	Previously Found SE
Pack age type	Hard Pack	Hard Pack
Pack age quantity	20 Cigarettes	20 Cigarettes
Character izing flavor	Menthol	Mentho
Length	98.5 mm	98.5 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	31.0%	33.0%
Additional property	Tipping Paper 2	N/A

Common Attributes of S	SE Reports	
Submission date	August 20, 2020	
Receipt date	August 20, 2020	
Product manufacturer	Philip Morris USA Inc.	
Product category	Cigarettes	
Product subcategory	Combusted, Filtered	
Attributes	New Tobacco Product Predicate Tobacco Product	
STN	SE0017350	SE0015298
Product name ³	Marlboro Menthol Blue Pack Box	Marlboro Menthol Special Select Box
Eligibility status	N/A	Previously Found SE
Package type	Hard Pack	Hard Pack
Package quantity	20 Cigarettes	20 Cigarettes
Characterizing flavor	Menthol	Mentho
Length	83 mm	83 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	19.0%	18.0%
Additional property	Tipping Paper 1	Tipping Paper 1
STN	SE0017354	SE0015300
Product name ³	Marlboro Menthol Blue Pack Box	Marlboro Menthol Special Select Box
Eligibility status	N/A	Previously Found SE
Package type	Hard Pack	Hard Pack
Package quantity	20 Cigarettes	20 Cigarettes
Characterizing flavor	Menthol	Mentho
Length	83 mm	83 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	19.0%	18.0%
Additional property	Tipping Paper 2	Tipping Paper 2

Common Attributes of S	E Reports	
Submission date	August 28, 2020	
Receipt date	August 28, 2020	
Product manufacturer	Philip Morris USA Inc.	
Product category	Cigarettes	
Product subcategory	Combusted, Filtered	
Attributes	New Tobacco Product	Predicate Tobacco Product
STN	SE0017688	SE0015617
Product name ³	Marlboro Black Special Blend 100's Box	Marlboro Black Special Blend 100's Box
Eligibility status	N/A	Previously Found SE
Pack age type	Hard Pack	Hard Pack
Pack age quantity	20 Cigarettes	20 Cigarettes
Character izing flavor	None	None
Length	98.0 mm	99.0 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	15.0%	15.0%
Additional property	Tipping Paper 1	Tipping Paper 1
STN	SE0017703	SE0015633
Product name ³	Marlboro Black Special Blend 100's Box	Marlboro Black Special Blend 100's Box
Eligibility status	N/A	Previously Found SE
Pack age type	Hard Pack	Hard Pack
Pack age quantity	20 Cigarettes	20 Cigarettes
Character izing flavor	None	None
Length	98.0 mm	99.0 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	15.0%	15.0%
Additional property	Tipping Paper 2	Tipping Paper 2
STN	SE0017704	SE0015634
Product name ³	Marlboro Black Special Blend 100's Box	Marlboro Black Special Blend 100's Box
Eligibility status	N/A	Previously Found SE
Package type	Hard Pack	Hard Pack
Package quantity	20 Cigarettes	20 Cigarettes
Characterizing flavor	None	None
Length	98.0 mm	99.0 mm
Diameter ⁴	7.89 mm	7.89 mm
Ventilation	15.0%	15.0%
Additional property	Tipping Paper 3	Tipping Paper 3