Altria
Altria Client Services

Rebecca Rivas
Senior Director
Regulatory Submissions

January 15, 2020

Via CTP Portal

Ms. Lillian Ortega
Director, Division of Enforcement and Manufacturing
Office of Compliance and Enforcement
Center for Tobacco Product
Food and Drug Administration
Document Control Center
Building 71, Room G335
10903 New Hampshire Avenue
Silver Spring, Maryland 20993

RE: 30-Day Notification for PM0000424 – PM0000426 and PM0000479

Dear Ms. Ortega:

Altria Client Services LLC ("ALCS"), on behalf of Philip Morris USA ("PM USA")[1], submits this 30-day notification related to Philip Morris Products S.A.'s ("PMPSA")[2] Marketing Order for PM0000424 – PM0000426 and PM0000479, Marlboro HeatSticks® and IQOS® System holder and charger. The materials submitted with this notification are provided pursuant to Periodic Reporting requirements in section IV, pp. 12-13 of the Marketing Order. [3]

This notification is not for pre-approval, but provides FDA timely access to PM USA's marketing materials and plans for which previous notification has not been provided. PM USA

[1] PM USA is a wholly-owned subsidiary of Altria Group, Inc. ("Altria"). Altria Client Services LLC provides certain services, including regulatory affairs, research and development, and regulatory sciences to the Altria family of companies. "We" or similar pronouns are used throughout to refer to PM USA.

[2] Philip Morris Products S.A. (PMP S.A.) is the PMTA applicant for PM0000424 – PM0000426 and PM0000479 (collectively, the "Authorized Products"), all of which were granted a Marketing Order by FDA on April 30, 2019. PMP S.A.'s parent company, Philip Morris International Management S.A. (PMI) has entered into an agreement with Altria Client Services LLC ("ALCS") by which ALCS and its affiliates, including Philip Morris USA ("PM USA"), are licensed to sell the Authorized Products in the United States after marketing authorization. The ALCS affiliate that will distribute and sell the Authorized Products in the United States is PM USA. Therefore, the marketing plans described in these responses are the marketing plans of PM USA.

[3] ALCS and its affiliates submit this notification in accordance with the Marketing Order and reserve all rights and remedies available under the law, Constitutional or otherwise.

expects to begin dissemination of the materials attached no earlier than 30 days from the date of this notification.

Please note that we have included with this submission an attachment to the notification for PM0000424 – PM0000426 and PM0000479. Attachment 1 provides an update on our approach to media engagement, which may potentially result in "earned media."

This notification contains confidential commercial information that PM USA considers to be proprietary and highly sensitive, and which is protected from disclosure under FDCA §§ 301(j) and 906(c) (21 U.S.C. §§ 331(j) and 387f(c)), the Trade Secrets Act (18 U.S.C. § 1905), the Freedom of Information Act ("FOIA") (5 U.S.C. § 552), and FDA's implementing regulations, 21 C.F.R. Part 20. If FDA receives a request for these records and tentatively determines that any portion of the submission is disclosable, PM USA requests that FDA provide notice and an opportunity for PM USA to object to any disclosure in accordance with 21 C.F.R. §§ 20.47 and 20.61. PM USA reserves all legal rights to protect against public disclosure of its trade secret and confidential commercial information and to seek legal recourse against anyone who discloses such information without legal authorization.

Please address all correspondence related to this 30-day notification to:

Ms. Rebecca Rivas
Sr. Director Regulatory Submissions
Altria Client Services LLC
2325 Bells Road
Richmond, Virginia 23234
Email: (b) (6)
Phone: (b) (6)

Sincerely,

(b) (6)

Attachments

cc: Jeff Walker
Malgorzata Wronowska

Attachment 1

ADDITIONAL BACKGROUND INFORMATION FOR NOTIFICATIONS PURSUANT TO MARKETING ORDER FOR PM0000424 – PM0000426 AND PM0000479

In conjunction with notifications of labeling, advertising, marketing, and/or promotional materials that we submitted to the FDA on June 7, 2019, we provided an attachment that gave background information, including information about marketing channels that we will employ and our approach to limiting youth access. Here, we provide additional background information.

While there is no definition of "earned media" in the Marketing Order for the Authorized Products, we intend to engage with the media as part of the normal course of launching a new product and rollout to new markets, including activities such as contacting media organizations, scheduling interviews with PM USA and Altria executives, and responding to media inquiries.

We will share information about the IQOS Tobacco Heating System® and our commercialization efforts in the U.S. For example, we may engage with the media on topics such as new market launches, store openings, regulatory developments, and features of this new product.

IQOS®

Batch 1.10.2020 FDA Notification, Marketing Creative Assets

Materials are current as of 1/9/2020

Subject to minor modifications

CONFIDENTIAL COMMERCIAL INFORMATION

Table of Contents

Channel	POS #s	Submission Quantity	Page
Third Party Retail Locations	MQ402	1	7 - 8
Customer Service Center	MQ537	1	9 - 10
Social Media	MQ530, MQ521, MQ532, MQ533, MQ534, MQ535, MP993, MO782	8	11 - 19
IQOS Retail Locations	(b) (4)	1	20 - 22

CONFIDENTIAL COMMERCIAL INFORMATION

Third Party Retail Location

CONFIDENTIAL COMMERCIAL INFORMATION

CONFIDENTIAL COMMERCIAL INFORMATION



Grey area indicates CURVED END
We recommend keeping all critical elements outside of this area.

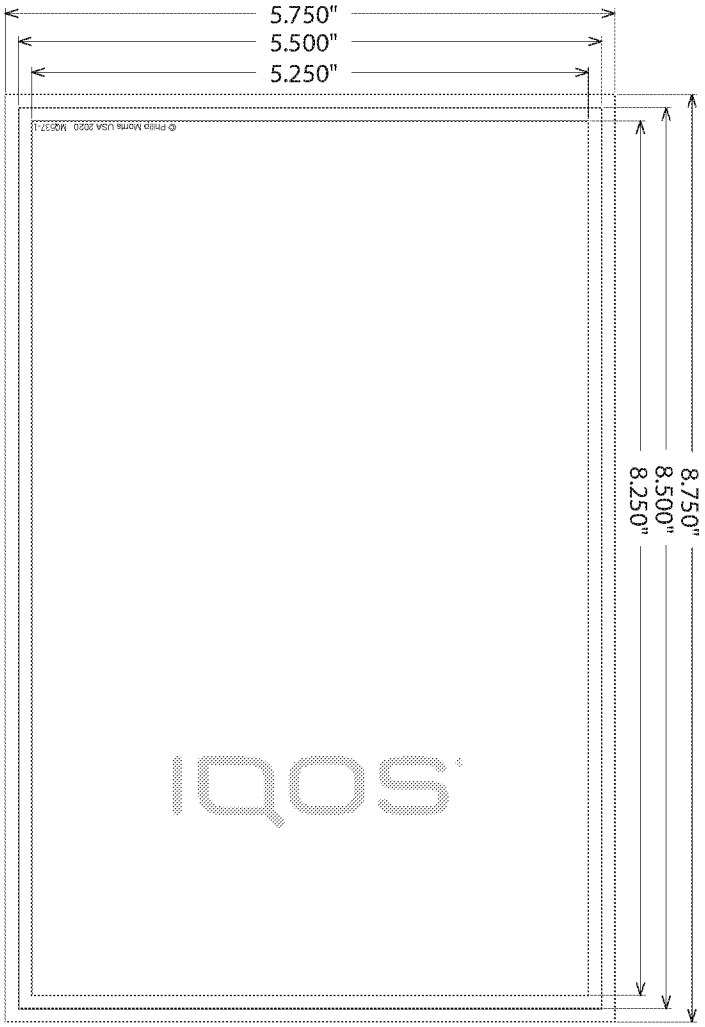
IQOS®

Grey area indicates CURVED END
We recommend keeping all critical elements outside of this area.

Customer Service Center

The following page includes a notecard which will be used by IQOS® customer service representatives to write handwritten notes to age verified 21+ adult smokers and IQOS® users that contact the Customer Service Center. These may include messages thanking them for their business, confirming a transaction, or other notes which are intended to personalize the customer service experience and make consumers feel supported throughout their conversion journey.

CONFIDENTIAL COMMERCIAL INFORMATION



CONFIDENTIAL COMMERCIAL INFORMATION	MQ537_IQOS_Notecard			
(b) (4)	iqos24324_5_MQ537_CT1 POS#:MQ537 ASSET SIZE: 5.5" x 8.5" IN-MARKET DATE: PUBLICATION DATE:	DIMENSIONAL INFORMATION LIVE: 5.25" x 8.25" TRIM: 5.5" x 8.5" BLEED: 5.75" x 8.75" SCALE: 100% PRINTING: 4 Color Process	PRODUCTION NOTES	NICOTINE WARNING ADVERTISING AREA: N/A NICOTINE WARNING SIZE: N/A TEXT FONT SIZE: N/A BORDER SIZE: N/A NOTE: SURGEON GENERAL WARNING ADVERTISING AREA: N/A EXHIBIT SIZE: N/A WARNING ROTATION: N/A ADDITIONAL DISCLAIMER FONT SIZE: N/A NOTE:

iqos24324_5

HIGHLY CONFIDENTIAL

PM USA	IQOS®	Notecard	01/06/2020
Client	Brand	Standard Name	Date

100%
100%
AI CC2018
4/C

(b) (4)

PMS
Cyan
Magenta
Yellow
Black
ADDITIONAL PMS:

NOTES:

Altria

ROUND 1	APPROVALS		
	APPROVED	NOT APPROVED	
	AS IS	NOTE	SEND A REVISED
PM			
BC			
AD			
CD			
STUDIO			
PROOF			

LAYOUT

(b) (4)

Social Media

The following pages include IQOS® branded page templates for Instagram and Facebook displaying the warning sizes for all posts. (b) (4) (b) (4) These updates are made in accordance with PM USA's warning rotation plan for HeatSticks, as submitted to the Federal Trade Commission.

(b) (4) (b) (4) With the creative and copy content of previously submitted posts not changing, we do not plan to resubmit the posts referenced below where this update will be applied.

30 Day Notification							
Batch	Page Numbers	Batch	Page Numbers	Batch	Page Numbers	Batch	Page Numbers
8/5/2019	33 - 44	8/22/2019	11 - 50	10/1/2019	58 - 120 & 122-139	12/12/2019	27 - 74
8/15/2019	54 - 74	9/13/2019	185 - 208	11/21/2019	23 - 47		

	MQ530_IQOS_SOCIAL_FACEBOOK_IMAGE POST 1 LINE FW			
(b) (4)	**FILE NAME** POS#: MQ530 ASSET SIZE: 640x640 pixels IN-MARKET DATE: TBC PUBLICATION DATE: N/A	**DIMENSIONAL INFORMATION** LIVE: N/A TRIM: N/A BLEED: N/A SCALE: N/A PRINTING: (COLOR)	**PRODUCTION NOTES**	**NICOTINE WARNING** ADVERTISING AREA: 664 x 640 pixels = 424,960 sq. pixels NICOTINE WARNING SIZE: 424,960 x 0.2 = 84,992 sq. pixels TEXT FONT SIZE: 25pt BORDER SIZE: 3MM NOTE: 39 pixels + 2 pixel contrast border **SURGEON GENERAL WARNING** ADVERTISING AREA: 664 x 640 pixels = 424,960 sq. pixels EXHIBIT SIZE: 359 x 75 pixels WARNING ROTATION: N/A NOTE: If asset is subject to SGW rotation, add here

IQOS SOCIAL MEDIA FRAMEWORKS

iQOS Facebook Image Post (1-Line Caption)

Date Modified: January 2, 2020

iPhone 5/SE

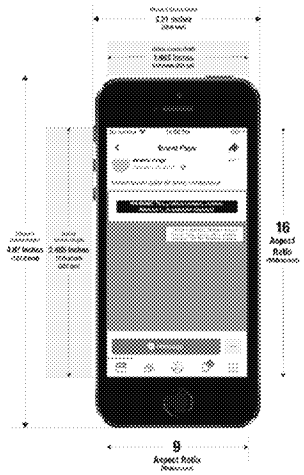
Operating System: iOS 11
(Oldest Supported iPhone for Facebook App)

Device Size:

Height: 4.87 inches (123.8 mm)
Width: 2.35 inches (59.8 mm)

Apple Retina Display Specifications:

1136-by-640-pixel screen resolution at 326 ppi (DK)
4-inch (diagonal) widescreen display (Aspect Ratio - 16:9)



35% Exhibit 1 - Cigarette Warning

Total Advertising Space in Pixels is
664 x 640 pixels = 424,960 sq. pixels

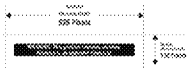
Total Advertising Space in Square Inches is
664 divided by 326 ppi = 2.04 inches
640 divided by 326 ppi = 1.963 inches
2.04 x 1.963 = 4.0 Total Square Inches

35% Exhibit 1 Measurements
35% Font at 72 ppi: 4.75 pt
35% Font at 326 ppi: 20.68 pt
Advertising Area (35%) = 12.75 sq. in.



Nicotine Warning - 25pt.

(1-Line Caption)



Advertising Area:
664 x 640 pixels = 424,960 sq. Pixels

Warning Area is 20% of Advertising Area:
424,960 x .2 = 84,992 sq. pixels

Warning Area:
568 x 150 = 85,200 sq. pixels

Warning Font:
Univers LT Std - 67 Bold Condensed - 25pt font

Warning Border:
Warning Area - 568 pixels + 2 pixel contrast border*
*Contrast border only necessary if warning border would otherwise blend into the background

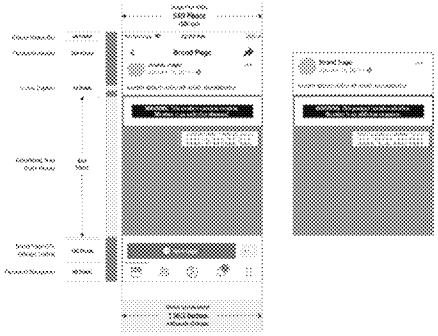
All pixel measurements are rounded up to the next whole number as pixels aren't displayed fractionally in Facebook. Warning Area calculation due to rounding up.

Facebook Image Post (1-Line Caption)

Image Upload Dimensions (1:1)
640 x 640-pixels (326 ppi)
1.963 x 1.963 inches
Total Budget (With 1-Line Caption): 664 Pixels

Notes:
- An Overlay duration warning will be used.
- Image post size does not change the physical size of the image.
- A specific aspect ratio can be specified and can vary from one location to the next.

Green Represents Advertising Area



(b) (4)

MQ531_IQOS_SOCIAL_FACEBOOK_IMAGE POST 2 LINE FW

FILE NAME
POS#: MQ531
ASSET SIZE: 640x640 pixels
IN-MARKET DATE: TBC
PUBLICATION DATE: N/A

DIMENSIONAL INFORMATION
LIVE: N/A
TRIM: N/A
BLEED: N/A
SCALE: N/A
PRINTING: (COLOR)

PRODUCTION NOTES

NICOTINE WARNING
ADVERTISING AREA: 640 x 700 pixels = 448,000 sq. pixels
NICOTINE WARNING SIZE: 448,000 x 0.2 = 89,600 sq. pixels
TEXT FONT SIZE: 27pt
BORDER SIZE: 3MM
NOTE: 39 pixels + 2 pixel contrast border

SURGEON GENERAL WARNING
ADVERTISING AREA: 700 x 640 pixels = 448,000 sq. pixels
EXHIBIT SIZE: 359 x 75 pixels
WARNING ROTATION: N/A
NOTE: If asset is subject to SGW rotation, add here

IQOS SOCIAL MEDIA FRAMEWORKS

iQOS Facebook Image Post (2-Line Caption)

Date Modified: January 2, 2020

iPhone 5/SE

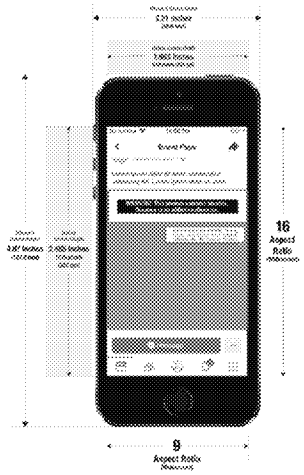
Operating System: iOS 11
(Oldest Supported iPhone for Facebook App)

Device Size:

Height: 4.87 inches (123.8 mm)
Width: 2.35 inches (59.8 mm)

Apple Retina Display Specifications:

1136-by-640-pixel screen resolution at 326 ppi (DK)
4-inch (diagonal) widescreen display (Aspect Ratio - 16:9)



35% Exhibit 1 - Cigarette Warning

Total Advertising Space in Pixels is
700 x 640 pixels = 448,000 sq. pixels

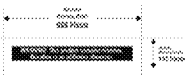
Total Advertising Space in Square Inches is
700 divided by 326 ppi = 2.15 inches
640 divided by 326 ppi = 1.963 inches
2.15 x 1.963 = 4.22 Total Square Inches

35% Exhibit 1 Measurements
SGW Font at 72 ppi: 4.73 pt
SGW Font at 326 ppi: 20.88 pt
Advertising Area (35%) = 12.75 sq. in.



Nicotine Warning - 27pt.

(2-Line Caption)



Advertising Area of Each Frame:
640 x 359 pixels = 448,000 sq. pixels

Warning Area is 20% of Advertising Area:
448,000 x .2 = 89,600 sq. pixels

Warning Area:
526 x 168 = 89,604 sq. pixels

Warning Font:
Helvetica 14 Std - 87 Bold Condensed - 27pt font

Warning Border:
Black border - 39 pixels + 2 pixel contrast border*
*Contrast border only required if warning border would otherwise blend into the background

All pixel measurements are rounded up to the next whole number as pixels aren't displayed anywhere in fractions. Warning Area variance due to rounding up.

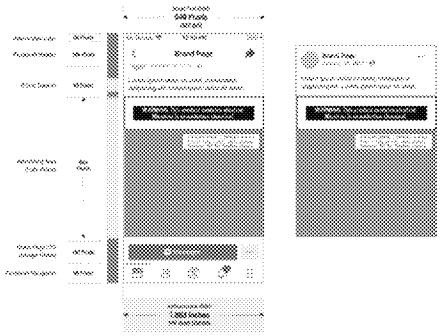
Facebook Image Post (2-Line Caption)

Image Upload Dimensions (1:1)
640 x 640 pixels (326 ppi)
1.963 x 1.963 inches

Total Height (With 1-Line Caption): 788 Pixels

Notes:
- No recorded negative scaling will be used.
- Image pixel size does not change the physical size of the image.
- If specific aspect ratio/density cannot be specified and can vary because Facebook user to the next.

Green Represents Advertising Area



	MQ532_IQOS_SOCIAL_FACEBOOK_IMAGE POST 3 LINE FW			
	FILE NAME POS#: MQ532 ASSET SIZE: 640x640 pixels IN-MARKET DATE: TBC PUBLICATION DATE: N/A	**DIMENSIONAL INFORMATION** LIVE: N/A TRIM: N/A BLEED: N/A SCALE: N/A PRINTING: (COLOR)	**PRODUCTION NOTES**	**NICOTINE WARNING** ADVERTISING AREA: 736 x 640 pixels = 471,040 sq. pixels NICOTINE WARNING SIZE: 471,040 x 0.2 = 94,208 sq. pixels TEXT FONT SIZE: 27pt BORDER SIZE: 3MM NOTE: 39 pixels + 2 pixel contrast border **SURGEON GENERAL WARNING** ADVERTISING AREA: 736 x 640 pixels = 471,040 sq. pixels EXHIBIT SIZE: 359 x 75 pixels WARNING ROTATION: N/A NOTE: If asset is subject to SGW rotation, add here

IQOS SOCIAL MEDIA FRAMEWORKS

IQOS Facebook Image Post (3-Line Caption)

Date Modified: January 2, 2020

iPhone 5/SE

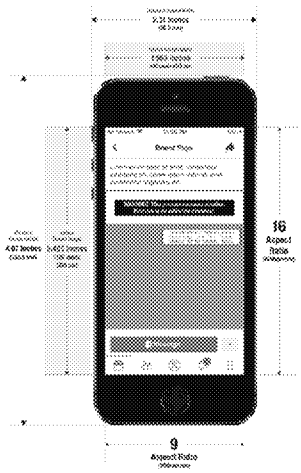
Operating System: iOS 11
(Oldest Supported iPhone for Facebook App)

Device Size:

Height: 4.87 inches (123.8 mm)
Width: 2.31 inches (58.6 mm)

Apple Retina Display Specifications:

1136-by-640-pixel screen resolution at 326 ppi (2x)
4-inch diagonal widescreen Display (Aspect Ratio - 16:9)

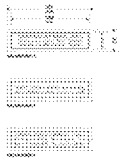


35% Exhibit 1 - Cigarette Warning

Total Advertising Space in Pixels is
736 x 640 pixels = 471,040 sq. pixels

Total Advertising Space in Square Inches is
736 divided by 326 ppi = 2.257 inches
640 divided by 326 ppi = 1.963 inches
2.257 x 1.963 = 4.430 Total Square Inches

35% Exhibit 1 Measurements
SGW Font at 72 ppi: 4.38 pt
SGW Font at 326 ppi: 20.09 pt
Advertising Area (35%) = 82.75 sq. in.



Nicotine Warning - 27pt.

(3-Line Caption)



Advertising Area:
736 x 640 pixels = 471,040 sq. pixels

Warning Area is 20% of Advertising Area:
471,040 x .2 = 94,208 sq. pixels

Warning Area:
368 x 192 = 94,208 sq. pixels

Warning Font:
Univers LT Std - 67 Bold Condensed - 27pt font

Warning Border:
3mm border - 39 pixels + 2 pixel contrast border*
*Contrast border color independent of warning border would differentiate overall text box background

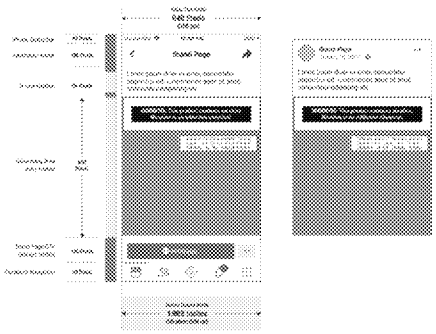
All pixel measurements to be rounded up to the next whole number as pixels aren't displayed fractions in fractions. Warning Area variance due to rounding up.

Facebook Image Post (3-Line Caption)

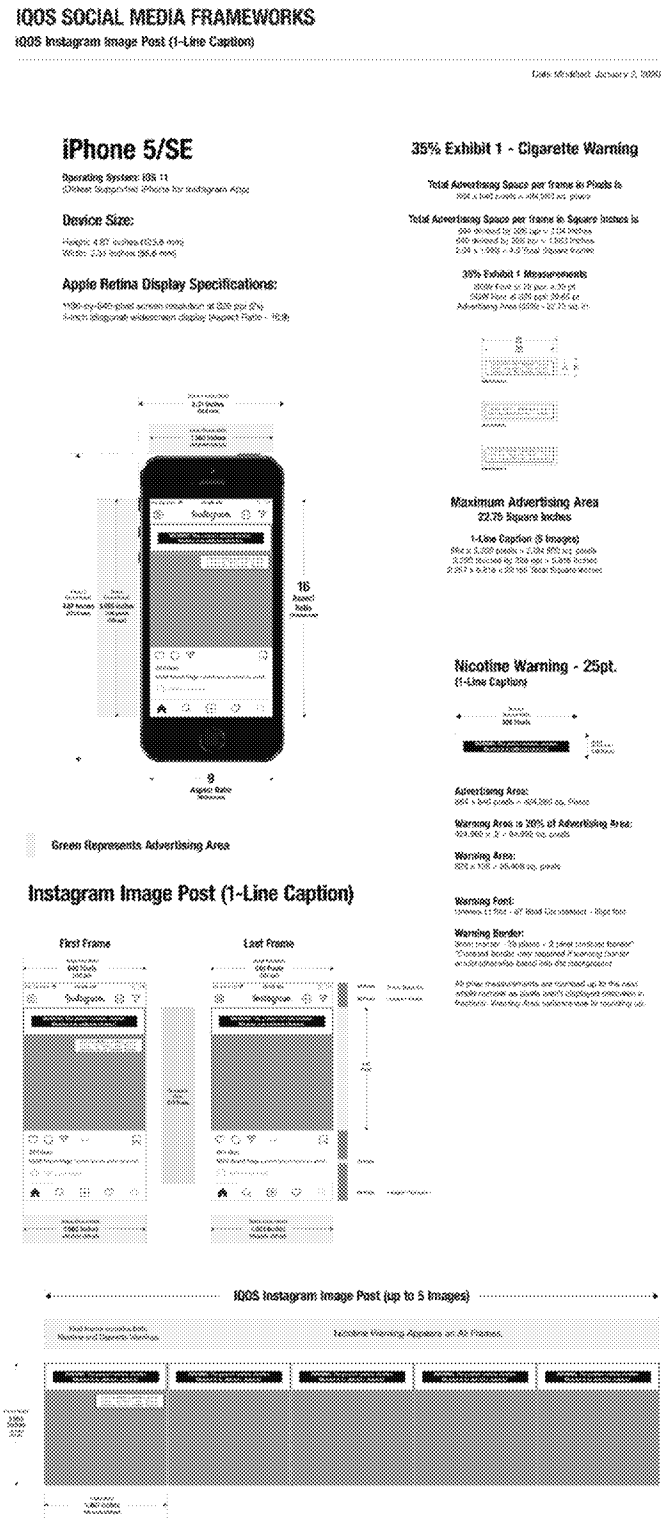
Image Upload Dimensions (1:1)
640 x 640 pixels (96 ppi)
1.955 x 1.955 inches
Total Height With 3 Line Caption: 736 Pixels

Notes:
- 3rd recommended warning will be cropped.
- Image must also have not enough text pixels due to cropping
- A specific typeface/boldness cannot be specified because every Facebook user is different

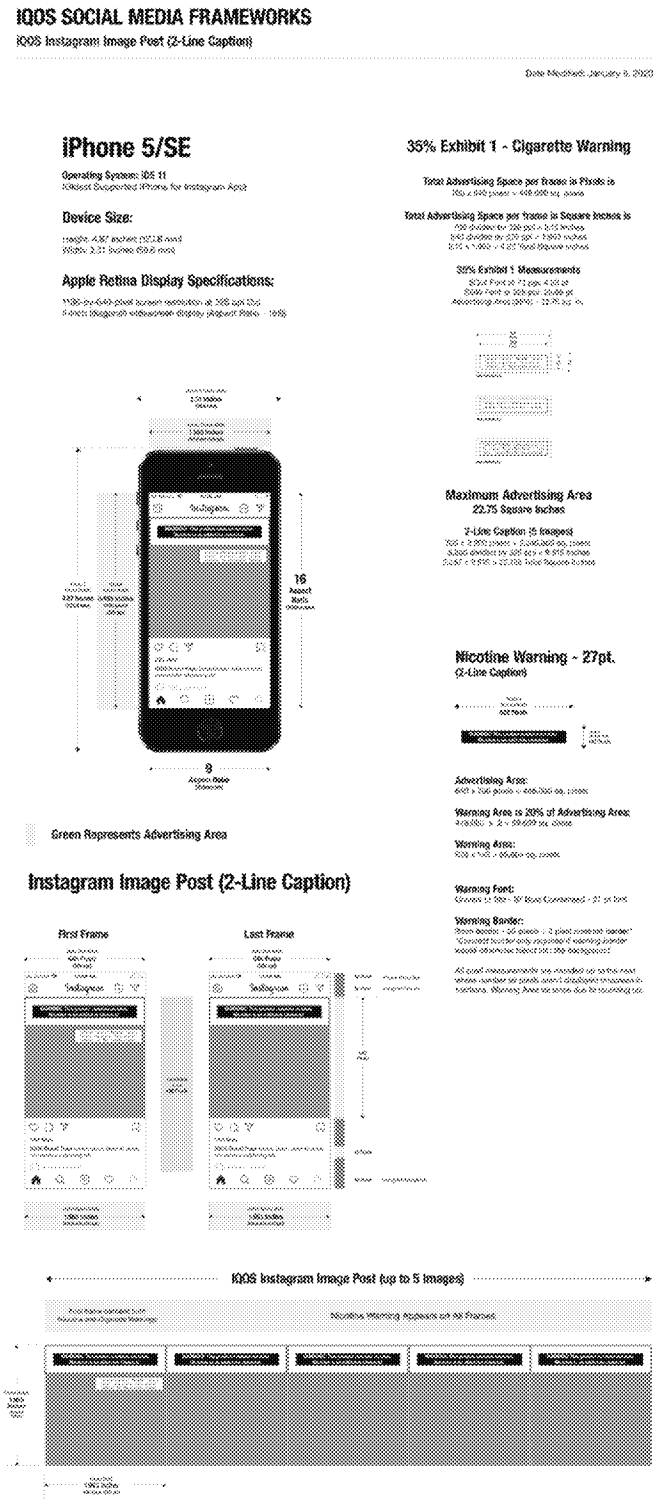
Green Represents Advertising Area



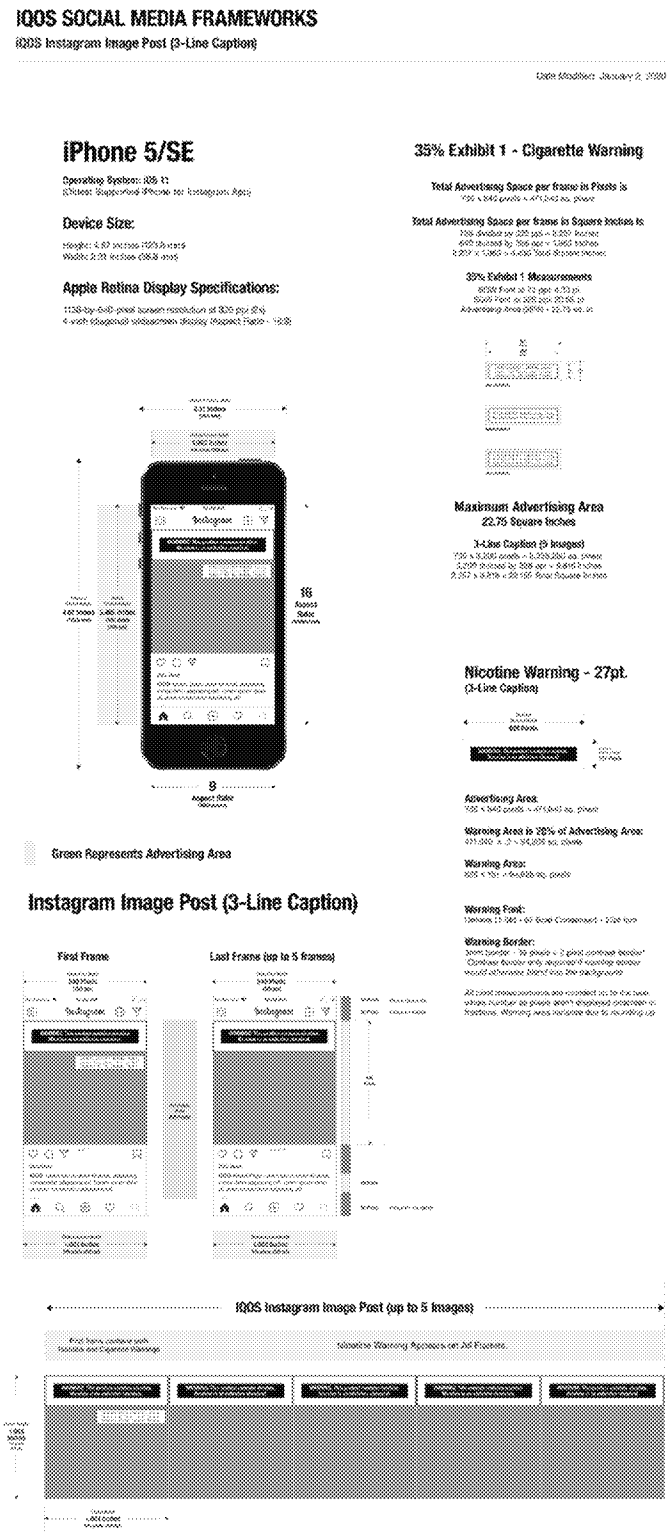
(b) (4)	MQ533_IQOS_SOCIAL_INSTAGRAM_IMAGE POST 1 LINE FW			
	FILE NAME POS#: MQ533 ASSET SIZE: 640x640 pixels IN-MARKET DATE: TBC PUBLICATION DATE: N/A	**DIMENSIONAL INFORMATION** LIVE: N/A TRIM: N/A BLEED: N/A SCALE: N/A PRINTING: (COLOR)	**PRODUCTION NOTES**	**NICOTINE WARNING** ADVERTISING AREA: 664 x 640 pixels = 424,960 sq. pixels NICOTINE WARNING SIZE: 424,960 x 0.2 = 84,992 sq. pixels TEXT FONT SIZE: 25pt BORDER SIZE: 3MM NOTE: 39 pixels + 2 pixel contrast border **SURGEON GENERAL WARNING** ADVERTISING AREA: 664 x 640 pixels = 424,960 sq. pixels EXHIBIT SIZE: 359 x 75 pixels WARNING ROTATION: N/A NOTE: If asset is subject to SGW rotation, add here



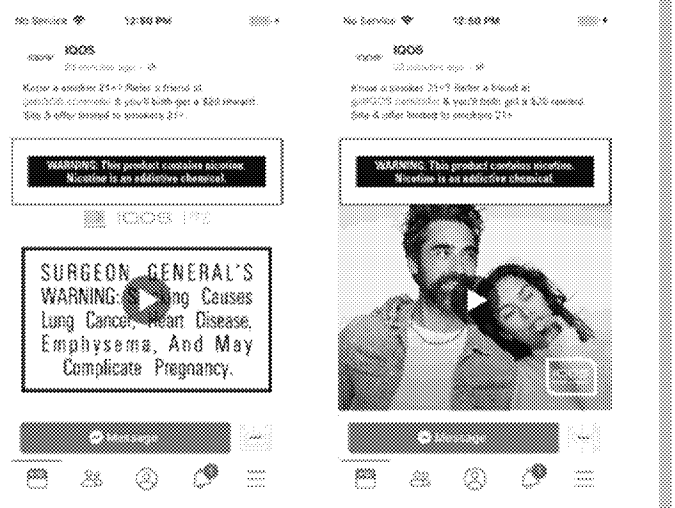
(b) (4)	MQ534_IQOS_ SOCIAL_INSTAGRAM_IMAGE POST 2 LINE FW			
	FILE NAME POS#: MQ534 ASSET SIZE: 640x640 pixels IN-MARKET DATE: TBC PUBLICATION DATE: N/A	**DIMENSIONAL INFORMATION** LIVE: N/A TRIM: N/A BLEED: N/A SCALE: N/A PRINTING: (COLOR)	**PRODUCTION NOTES**	**NICOTINE WARNING** ADVERTISING AREA: 640 x 700 pixels = 448,000 sq. pixels NICOTINE WARNING SIZE: 448,000 x 0.2 = 89,600 sq. pixels TEXT FONT SIZE: 27pt BORDER SIZE: 3MM NOTE: 39 pixels + 2 pixel contrast border **SURGEON GENERAL WARNING** ADVERTISING AREA: 700 x 640 pixels = 448,000 sq. pixels EXHIBIT SIZE: 359 x 75 pixels WARNING ROTATION: N/A NOTE: If asset is subject to SGW rotation, add here



	MQ535_IQOS_SOCIAL_INSTAGRAM_IMAGE POST 3 LINE FW			
(b) (4)	**FILE NAME** POS#: MQ535 ASSET SIZE: 640x640 pixels IN-MARKET DATE: TBC PUBLICATION DATE: N/A	**DIMENSIONAL INFORMATION** LIVE: N/A TRIM: N/A BLEED: N/A SCALE: N/A PRINTING: (COLOR)	**PRODUCTION NOTES**	**NICOTINE WARNING** ADVERTISING AREA: 736 x 640 pixels = 471,040 sq. pixels NICOTINE WARNING SIZE: 471,040 x 0.2 = 94,208 sq. pixels TEXT FONT SIZE: 27pt BORDER SIZE: 3MM NOTE: 39 pixels + 2 pixel contrast border **SURGEON GENERAL WARNING** ADVERTISING AREA: 736 x 640 pixels = 471,040 sq. pixels EXHIBIT SIZE: 359 x 75 pixels WARNING ROTATION: N/A NOTE: If asset is subject to SGW rotation, add here



Previously Submitted Batch 11/21/2019 Page 37-38



Updated



Previously Submitted Batch 11/1/2019 Page 92-93



Updated



IQOS® Retail Locations

CONFIDENTIAL COMMERCIAL INFORMATION

IQOS® Retail Locations

(b) (4)

(b) (4)