

736 Irving Ave., 3WT
Syracuse, NY 13210

Department of Obstetrics and Gynecology



Tel 315.470.7900
Fax 315.470.7999

www.upstate.edu

State University of New York
Upstate Medical University
COLLEGE OF MEDICINE

February 4, 2004

Mark B. McClellan, MD, PhD
Commissioner of Food and Drugs
U.S. Food and Drug Administration
5600 Fisher Lane
Rockville, Maryland 20857

Dear Mr. McClellan:

I am writing as a board certified obstetrician/gynecologist, a member of the American College of Obstetricians and Gynecologists (ACOG), and a charter member of the Association of Reproductive Health Professionals (ARHP) to support over-the-counter (OTC) status for Plan B emergency contraceptive pills (ECPs). I have reviewed the scientific literature and believe the evidence clearly supports this change. I agree with the FDA advisory panel's finding that the data shows ECPs to be safe and effective for reducing unintended pregnancy and that it is appropriate for over-the-counter use. I urge you to support OTC access to ECPs.

Concerns that ECPs are not safe are unsubstantiated and contradict the scientific evidence presented to the FDA. Concerns that emergency contraception cause increased sexual activity among adolescents and teens are equally unfounded. Research shows that ECPs do not increase sexual activity and that they have a significant public health benefit by reducing unintended pregnancies among women of all ages, including teens.

The sooner emergency contraceptive pills are taken after unprotected intercourse, the more effective they can be. Evidence shows that some women still find it difficult or impossible to get emergency contraception from a provider or health care professional in time. Like most of my colleagues, I am not available to provide it 24 hours a day, 7 days a week.

The evidence is clear: ECP's should be available over the counter for the women who can benefit. All women deserve the opportunity to safely and effectively protect themselves from unintended pregnancy.

Sincerely,

Philip L. Ferro, M.D.

Professor

OIP 0075

OIP 0075

C 687