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Anesthetic and Life Support Drug Advisory Committee
Kimberly Topper
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fisher Lane
Rockville, Maryland 20857
FAX: (310) 827-6801

Dear Ms. Topper:

I am writing this letter to voice my opinion on chronic opioid use for chronic pain therapy. I have been in practice for some 10 years doing chronic pain therapy, and use of opioids is absolutely essential in maintaining many patients' quality of life issues, when other alternatives are not available. It is detrimental for regulatory agencies to inadvisedly and prematurely interfere with the practice of medicine in opioid prescribing for patients who need appropriate medical care.

There is no question that in this country there is a serious problem with diversion of prescriptive medications, especially narcotics. OxyContin has recently been in the news and has been inflamed by the press to a level that is, in my opinion, not reasonable. Other medications are more of an abuse problem, which is well-documented and recognized by all authorities. I would support any education programs and enforcement of current laws to alleviate this drug diversion that is prevalent in this country. We all recognize that the financial incentives of those who seek to divert prescriptive medications into the nonmedical community is going to be an ongoing problem.

The use of opioids for pain control in chronic pain and cancer pain is very well-documented, and tolerance to the medications and dosage schedules are difficult to evaluate, at best. In my experience over the last 10 years in working with patients who have chronic pain and cancer pain, it is impossible to predetermine the amount of medications required for alleviation of pain and increased quality of life. Being an anesthesiologist, I am aware of the necessity to titrate drugs to an effective level for the relief of pain as well as anesthesia. I am very concerned that through governmental rules, a restriction on the amount of medications available in the US may become a problem.

We have seen in the past that eliminating or decreasing the availability of medications through regulatory agencies has been detrimental to public welfare, and I would recommend strongly that we be judicial in our process of implementing regulations that may have serious outcomes that are not in the intent of the regulatory agencies when these things come to pass. Please understand that the pharmaceutical companies that develop and distribute these medications are doing their utmost to alleviate the diversion problem in

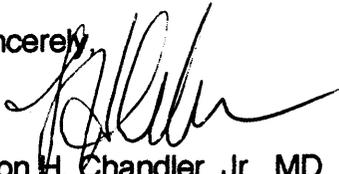
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this country and have been taking a proactive approach in our local market as well as on a national level. Purdue Pharma has been very supportive of this in the past, and I would encourage the government to support education forums as well as more strict enforcement of current law, rather than restricting market availability of medications.

Thank you very much for taking the time to allow me to comment on this very important topic. If I can be of any help in your decision making process, I would be more than happy to make myself available to you.

Sincerely,



Leon H. Chandler, Jr., MD
LHC: tw

cc: Lisa Murkowski, Alaska House of Representatives
Alaska State Medical Board
Robert F. Reder, MD - Vice President of Medical Affairs and World Drug Safety
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