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Dockets Management Branch (HFA-305)
Food & Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20857

To Whom It May Concern:

Re: Docket Nos. 92N-0297 and 88N-0258

We are a licensed prescription drug wholesaler doing business in 20 states. We purchase most of our inventory through two of the major full-line wholesale distributors.

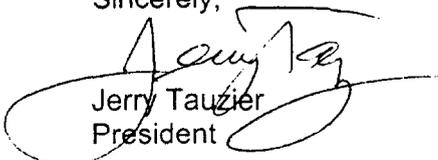
If we were required to provide prescription drug pedigrees that go back to the manufacturer to our customers, we could do so only in those instances where we have purchased directly from the manufacturer or purchased from an "unauthorized distributor" who is able to provide that complete information to us. However, those "unauthorized distributors" will not be able to do so unless they purchased directly from the manufacturer, which is rarely the case. Since we do most of our business with major full-line wholesalers who do not provide any pedigrees, and because most "unauthorized distributors" will not be able to provide pedigrees back to the manufacturer, we will not be able lawfully to engage in about 75% of the transactions we now engage in.

Our company services over 1000 physicians and clinics that have advised us that their business will be adversely affected if we are not able to supply them. We have tried to become authorized distributors but our requests to some manufactures have been turned down because they are not adding new distributors or have certain minimum order requirements.

Our company employs 43 people who will be put out of their jobs if the prescription drug pedigree requires that transactions be reported back to the manufacturer.

We support a return to the guidance issued by the FDA in August 1988 with respect to prescription drug pedigrees and authorized distributors.

Sincerely,


Jerry Tauzier
President

88N-0258

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