

May 25, 2000

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

Dear Sir/Madam:

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

We purchase pharmaceuticals from a local wholesale distributor who buys from full-line wholesalers and from other small wholesalers. I understand FDA is requiring much more extensive prescription drug sales history information than has been required under the 1988 FDA Guidance on this issue that wholesalers have followed for the past 12 years. As a result, my wholesale supplier wholesalers have followed for the past 12 years. As a result, my wholesale supplier may be put out of business.

We are not easily able to purchase from large full-line wholesalers or manufacturers. Our supplier is important to our business. Please make the regulations consistent with the guidance that was previously in effect so that our supplier may stay in business.

Sincerely yours,

J. Annot MD
6/14/00

88N-0258

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TAB Physician Supply

P.O. Box 616
225 Maggie Drive
Pontotoc, MS, 38863

Phone 662-489-9330

Fax 662-489-9363

June 06, 2000

Dear Valued Customer,

TAB Physician Supply needs your help. The Food and Drug Administration (FDA) is delaying until October 1, 2001 the effective date and reopening the administrative record to receive additional comments regarding certain requirements of a final rule implementing the Prescription Drug Marketing Act of 1987.

The Administrative record is reopening until July 3, 2000 to receive additional comments on these provisions.

To explain what the PDMA of 1987 means: the FDA is trying to implement an act that would prohibit any wholesaler or distributor to purchase prescription drugs if they are not buying directly from the manufacturer. Since we do not buy directly from the manufacturers we would be put out of business as far as injectables are concerned. Many more small companies would be put out of business entirely.

We are asking our customers to sign the drafted letter and send it to the FDA. We have provided the stamp and envelope with hope that you will stand up for the smaller companies out there.

It is us, the smaller companies that keep prices down for you. If we are put out of business, we cannot give the larger companies competition. If we do not give them competition, your prices will gradually increase and then will be able to demand pricing that suits their needs.

Thank you for your time.

Best regards,



Ashley Butler
TAB Physician