

PARK SURGICAL CO., INC.

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Robert Silverstein
Institutional Sales

May 11, 2000

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

Dear Sir:

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

We are licensed prescription drug wholesalers doing business in fifty states.

We purchase some of our inventory through several of the major full-line wholesale distributors.

We purchase approximately 10% of our inventory from smaller wholesaler distributors who, in some cases, are not authorized distributors for the products they sell.

We do not receive prescription drug pedigrees from full-line wholesalers or from manufacturers.

If we are 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 much 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 to lawfully to engage in 20% of the transactions we now engage in.

Very truly yours,



Robert Silverstein

RS/jd

88N-0258

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