



PERIGON MEDICAL DISTRIBUTION CORP.

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May 9, 2000

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

Re: Docket #s: 92N-0297 and 88N-0258

Dear Sir/Madam:

Perigon Medical Distribution Corporation is a licensed prescription drug distributor/wholesaler. We are currently doing business in eighteen (18) states. We purchase most of our inventory through one of the major full line wholesale distributors. However, we also purchase approximately 30% of our inventory from smaller wholesale distributors, who, in some cases, are not authorized distributors for the products they sell. We purchase only from one drug manufacturer. Currently, we do not receive any prescription drug pedigrees from wholesalers or manufacturers. As you can clearly see, if we were required to provide pedigrees that go back to the manufacturers to our customers, we could only provide those purchased directly from the manufacturer or those purchased from "unauthorized distributors" who are able to provide the complete information to us. However, these "unauthorized distributors" will not be able to provide this information, unless they purchased product directly from the manufacturer. I assure you, this is rarely the case. Since we do most of our business with major full line distributors who do not provide pedigrees, and "unauthorized distributors" will not be able to provide us with pedigrees, we will not lawfully be able to engage in 95% of the transactions we currently do.

Our company currently services large numbers of physicians, clinics, long term care and hospices throughout the country. 100% of our customers have advised us that their business will be greatly adversely affected if we are unable to supply them. We have tried, in the past, to become authorized distributors to no avail. The parameters are such that they are impossible. In some cases, we have even been flatly ignored.

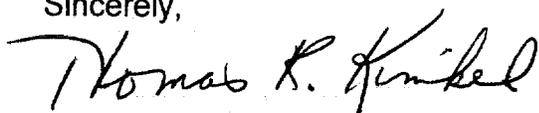
The impact of lost business, should we be required to report prescription drug pedigrees back to the manufacturer on transactions, would be such that we

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would have to put a large number of people out of their jobs. We strongly support a return to the guidance issued by the Food and Drug Administration in August 1988 with respect to prescription drug pedigrees and authorized distributors.

Sincerely,

A handwritten signature in black ink that reads "Thomas R. Kimbel". The signature is written in a cursive style with a large initial 'T'.

Thomas R. Kimbel
Sales Manager

TRK:kje

CROSS FILE SHEET

FILE NO: 88N-0258/C78

SEE FILE NO: 92N-0297/e65