



**American
Pharmaceutical
Association**

2215 Constitution Avenue, NW
Washington, DC 20037-2985
(202) 628-4410 Fax (202) 783-2351
<http://www.aphanet.org>

*The National Professional
Society of Pharmacists*

October 12, 2000

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

RE: Docket No. 92N-0297

Dear Sir/Madam:

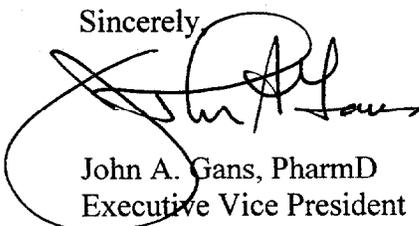
The American Pharmaceutical Association (APhA), the national professional society of pharmacists, is interested in presenting at the October 27th Public Hearing on the Prescription Drug Marketing Act of 1987. John A. Gans, PharmD, APhA's Executive Vice President, or Susan C. Winckler, APhA's Group Director of Policy and Advocacy, will present on APhA's behalf.

We request approximately 5 minutes to present information related to the pharmacist's perspective on the wholesale distribution of prescription drugs by distributors that are not authorized distributors of record, specifically how this regulation would affect pharmacists' ability to obtain prescription drugs. The regulation, as proposed, will alter the manner in which drug manufacturers, wholesale distributors, and secondary wholesale distributors conduct business. Unauthorized distributors that are unable to obtain a drug origin statement may be forced out-of-business. The closing of unauthorized distributors would create a disruption in drug distribution, reduced competition among remaining distributors, and an increase in the price of prescription drugs. A disruption in prescription drug distribution would have a substantial negative impact on pharmacists, their pharmacies, and their patients.

Correspondence on this issue should be directed to the American Pharmaceutical Association (APhA), 2215 Constitution Avenue, NW, Washington, DC 20037-2985. Telephone: 202-429-7538; Facsimile: 202-638-3793.

Please contact Susan K. Bishop, APhA's Manager of Regulatory Affairs and Political Action, with any questions about this request. She may be reached at 202-429-7538 or skb@mail.aphanet.org.

Sincerely,


John A. Gans, PharmD
Executive Vice President

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92N-0297

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Sincerely

A handwritten signature in black ink, appearing to read 'John A. Gans', is written over a large, stylized circular flourish.

John A. Gans, PharmD
Executive Vice President