

September 5, 2001

Kimberly Topper  
Food and Drug Administration, CDER  
Advisors and Consultants Staff, HFD-21  
5600 Fishers Lane  
Rockville, MD 20857

Re: Docket Number 01N-0256

Dear Ms. Topper:

Thank you for the opportunity to submit this statement to the Food and Drug Administration Anesthetics and Life Support Drugs Advisory Committee regarding the medical use of opiate analgesics in patients with chronic pain of nonmalignant etiology, including pediatric patients.

On behalf of the more than 800,000 Americans living with chronic fatigue and immune dysfunction syndrome (CFIDS, also known as chronic fatigue syndrome or CFS), The CFIDS Association of America expresses its support for the use of opiate analgesics when clinically indicated to alleviate pain in CFIDS and other chronic pain conditions. Despite its benign-sounding name, CFIDS frequently involves intractable pain resulting in considerable disability and diminished quality of life. In fact, four of the eight defining symptoms for CFS involve pain. Physicians are often reluctant to provide adequate pain relief to CFIDS patients due to misinformation about the severity of pain associated with the illness.

Chronic pain is rarely considered to be life threatening, but untreated pain is a common predictor of suicide among persons with CFIDS. It is also a leading cause of disability and suffering among these patients. In the course of providing compassionate, humane medical care, health care providers should alleviate the suffering caused by chronic pain using the most effective medically indicated means.

The CFIDS Association of America encourages the FDA Anesthetics and Life Support Drugs Advisory Committee to recommend the use of opiate analgesics when medically indicated to alleviate pain related to CFIDS and other chronic pain conditions. As the nation's leading organization working to conquer CFIDS, we would be delighted to provide additional information or respond to specific questions; please visit our website at [www.cfids.org](http://www.cfids.org), or contact us at fax 704-365-9755, phone 704-364-0016, or e-mail [kkenney@cfids.org](mailto:kkenney@cfids.org).

I am included in the 800,000 Americans with this disease,

Thank you,

Julie Nish