



# AMERICAN SOCIETY FOR REPRODUCTIVE MEDICINE

Formerly The American Fertility Society

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July 25, 2005

### Re: Docket No. 2001P-0075, Switch Status of Emergency Contraceptives From RX to OTC

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Dear Dr. Galson:

We write on behalf of the American Society for Reproductive Medicine in support of changing the status of Plan B (Emergency Contraception) from prescription to over-the-counter availability.

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For women whose normal method of birth control has failed or who have been raped, emergency contraception provides a very reliable means of preventing unwanted pregnancy. Unfortunately, EC is not always readily available. It is often difficult to reach a women's health physician for a prescription during the weekend and hospital emergency rooms do not always provide EC. Access is crucial if EC is to work effectively. While recent research has shown that EC can be effective when taken up to 120 hours after unprotected intercourse, its effectiveness is greater the sooner it is used. When used correctly and the first dose taken within 72 hours of unprotected intercourse Plan B has been found to be 89% effective.

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If we are to optimize women's reproductive health, it is essential that we remove impediments to obtaining EC. It has been estimated that over-the-counter availability of EC would result in increased use which could prevent 1.7 million unplanned pregnancies per year and countless abortions. This would make a remarkable difference in the US, a country with higher rates of unintended pregnancy and abortion than any other Western, industrialized nation.

#### AMA DELEGATE

KAMRAN S. MOGHISSI, M.D.

Plan B, a levonorgestrel-only emergency contraceptive, does not present serious risks. Five states- Washington, California, Alaska, Hawaii, and New Mexico- have already made it available directly from pharmacists without prescription.

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Available studies show that the drug is safe and that consumers are easily able to follow the package instructions. Use of EC will not influence them to use regular contraception less frequently; and, if EC is available over-the-counter, they are more likely to use it when necessary.

The American Society for Reproductive Medicine, founded in 1944, is a national medical professional society with approximately 8500 members in the US and abroad dedicated to advancing knowledge and expertise in reproductive biology. ASRM works to promote the reproductive health of women and men through its commitment to research, professional and patient education, and advocacy in health care policy.

Sincerely yours,



Robert Schenken, MD  
President



Robert W. Rebar, MD  
Executive Director



# AMERICAN SOCIETY FOR REPRODUCTIVE MEDICINE

*Formerly The American Fertility Society*

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Division of Dockets Management  
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Rockville, Md 20852

July 28, 2005

Dear Sir or Madam,

The American Society for Reproductive Medicine is submitting the enclosed comments for Docket 2001P-0075, Switch Status of Emergency Contraceptives from RX to OTC.

I have enclosed a third copy and return envelope so that we might receive a date-stamped copy for our files.

Thank you,

Eleanor Nicoll  
Public Affairs Manager