

**BlueCross BlueShield  
of North Dakota**

*An independent licensee of the  
Blue Cross & Blue Shield Association*



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March 31, 2004

Dr. Richard Carmona  
Division of Dockets Mgmt (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Chairman Carmona and Task Force Members:

On behalf of the Members of Blue Cross Blue Shield of North Dakota, I write today to ask the Commission to explore ways of making the importation of less expensive drugs safe for Americans.

Many of our members have used the Canadian health care system and many Canadians have made use of ours. Over the years we've found ways to not only understand but, more importantly, access each other's health care systems. For instance we have had to find ways to process each other's health claims, as well as passively pay for Canadian drugs when our members present receipts.

Our experience indicates that the Canadians, like the United States, have a fairly solid chain of control that guides their pharmacy system. We are not aware of any situations where Canadian drugs have caused harm to our Members. Thus we're led to believe that one solution to the re-importation question would be to seek ways to mesh the two pharmacy systems into the safest re-importation process available.

North Dakota's pharmacies are very conscientious about safety and they have served us well. Like all pharmacies, ours have also become quite sensitive to the costs of pharmaceuticals and attempted to institute a variety of cost savings initiatives. Given the potentials of further savings via re-importation we believe that North Dakota pharmacies would be interested in developing a re-importation program.

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Therefore we would respectfully request that this commission consider adopting a program where the re-importation of drugs would be based on verifiable medical necessity and distributed from licensed Canadian pharmacies to licensed American pharmacies.

It's our opinion that the systems could be set up to assure that chains of control are accurately tracked. One model for such a system might be Senator Byron L. Dorgan's Prairie Prescriptions Pilot Project. We encourage the commission to consider this project as an approach that addresses safety concerns by maintaining a closed chain of custody between U.S. and Canadian licensed pharmacists and wholesalers. Such a program could help create new ways to assure the safety of the re-importation and may provide our seniors some relief while we continue to search for better answers to the soaring costs of prescription drugs.

Thank you for your consideration.

Sincerely,



Michael B. Unhjem  
President & CEO