

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852.

Re: Docket No. 2004N-0115

To whom it concern:

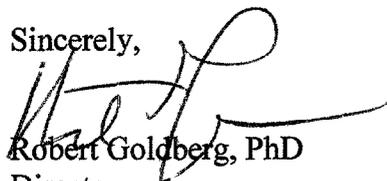
On behalf of the Manhattan Institute for Policy Research, I am submitting comments on prescription drug importation to the docket (2004N-0115) established by the Food and Drug Administration on March 18, 2004. 69 Fed. Reg. 12810 (March 18, 2004).

The current policy debate on the economic costs and benefits of importing prescription drugs is long on rhetoric and short on empirical analysis conducted by economists. Indeed, one of the bills submitted to Congress estimates that consumers can save \$635 billion a year from importation, which of course is more than what is spent on medicines worldwide, while others suggest that every consumer can save up to 300 percent on medicines by importing medicines. The public discourse rarely includes long term analysis of the impact of importation on the supply, demand, and price of medicines, or any peer-reviewed assessment of the supposed economic benefit for consumers.

I have, therefore, attached a list of importation studies conducted by economists. These include studies published in peer-reviewed journals and studies submitted for peer review. I also urge the Task Force to review a recent study by Professor John Vernon of the University of Connecticut, estimating the impact of importation on R&D expenditures. Professor Vernon's study can be accessed at <http://www.aei-brookings.org/admin/authorpdfs/page.php?id=930>.

If you need additional information, please contact me directly.

Sincerely,



Robert Goldberg, PhD
Director
Center for Medical Progress
Manhattan Institute for Policy Research
973-379-4029
bobgoldberg@yahoo.com

2004N-0115

C9

Parallel Trade Studies

1. Summary of parallel trade studies

2. The Economic Impact of Pharmaceutical Parallel Trade: A Stakeholder Analysis

London School of Economics, Panos Kanavos, PhD
November 2003

3. Parallel Trade in Pharmaceuticals

Jacob Arfwedson/CNE Health
July 2003

4. Parallel Imports and Reimportation in the Pharmaceutical Market: Misguided Health Policy

German Association of Research-based Pharmaceutical Companies (VFA)
September 2002

5. Institute for Health Economics

Parallel Trade in Drugs in Sweden – An Economic Analysis
2001

6. Parallel Imports of Pharmaceutical Products in the European Union

Mattias Ganslandt and Keith Maskus
March 2001

7. The Economics of Parallel Trade

Patricia M. Danzon
PharmacoEconomics 1998

8. Commission to Investigate Parallel Importation of Drugs to Israel Final Report

Israeli Ministry of Health Director General Dr. Yehoshua Shemer
December 1997

9. Survey of Parallel Trade

N/E/R/A
1997