



Men's Health Network
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April 21, 2005

Food and Drug Administration
Dockets Management Branch
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Petition number 2004p-0351

To Whom It May Concern:

Men's Health Network (MHN) is a non-profit educational organization made up of physicians, researchers, public health workers, individuals and other health professionals. MHN was founded in 1992 by a group of men's activists and writers interested in improving the health and well-being of men, boys and families.

MHN supports the revolution in thinking about male sexual dysfunction, following the introduction of Viagra, because it offers new hope for men suffering from erectile problems. We believe that erectile dysfunction (ED) is a medical condition. Failure to achieve and maintain an erection can be caused by heart disease, diabetes, certain medications, lifestyle, or other problems. In turn, psychological disturbances can be caused by ED. The Diagnostic and Statistical Manual, Fourth Edition, describes sexual dysfunctions, including ED, as being characterized by disturbance in sexual desire and in the psychophysiological changes that characterize the sexual response cycle and cause marked distress and interpersonal difficulty. Distress and interpersonal difficulty are unhealthy experiences and thus are in direct conflict with MHN goals and mission.

The inappropriate recreational use of the ED class of drugs does not eliminate the therapeutic resolve that these drugs provide. Viagra and other therapeutic drugs for ED do not influence decision making processes, it merely enables a man to have an erection. It is not the use of the ED class of drugs, but the practice of unsafe sex, with or without the use of these drugs, that increases the risk for new sexually transmitted diseases, including HIV infection.

We oppose petition number 2004p-0351 to the Food and Drug Administration to amend the product label of Viagra to state, "The use of Viagra increases the risk for new sexually transmitted diseases, including HIV infection". We do support an awareness and education campaign promoting safe sex but not one delineating a direct correlation between the use of Viagra or any other ED drug and STD transmission.

Sincerely,


Jimmy Boyd
Executive Director

2004P-0351

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