

May 29, 2001

JACKSON  
ADVERTISING  
FEDERATION

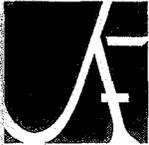
Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, rm. 1061  
Rockville, MD 20852

7562 '01 JUN -4 P2:20

Docket No. 01N-0078

Dear Sirs:

The Jackson Advertising Federation appreciates the opportunity to comment on the Food and Drug Administration's proposed surveys on direct-to-consumer advertising of prescription medicines.



The Jackson Advertising Federation is an organization of advertising and media professionals in the Central Mississippi area. In addition to monitoring legislative activities concerning advertising, we provide educational opportunities for our members and other professionals; encourage the pursuit of careers in advertising; provide professionals to assist in the educational sector; assist with community service projects and more.

Our organization believes that DTC advertising of prescription medicines provides valuable information to consumers; information that helps them effectively manage their health care needs. This is especially true for ethnic populations. We urge the FDA to use this opportunity to examine the public health benefits that DTC advertising of prescription medicines may have in these communities.

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There is survey evidence that DTC advertising plays a key role in motivating minority patients to seek medical care. The DTC Monitor survey conducted last year, for example shows that minority respondents are more likely to contact their doctor after seeing a DTC ad than were white respondents. Twenty-nine percent of minority respondents said that they were very likely to initiate conversations with their doctors compared to only 19 percent of White respondents. (Source: DTC Monitor 2000)

The survey also suggests that minority respondents gave slightly higher marks to DTC advertising than did White respondents. Seventy-one percent of minority respondents said that DTC ads provide a valuable education service, as opposed to 66 percent of White respondents. (Source: DTC Monitor 2000)

There is also evidence that African-Americans and Hispanics are not as aware of DTC advertising as Whites. The Prevention Magazine survey released earlier this year reports that while 84 percent of Whites surveyed said they had seen or heard DTC advertisements, only 69 percent of African-Americans and 57 percent of Hispanics were aware of DTC ads. (source: Prevention Magazine 2001). Therefore, the potential benefits of DTC advertising among minority populations may be understated among these populations.

In light of this findings, the Jackson Advertising Federation encourages the FDA to have a large enough sample size to draw conclusions not only about the different perspectives on DTC advertising among African Americans, Hispanics and Whites, but also to better understand how DTC advertising is effecting health care decisions made by minority patients. We are convinced that the proposed sample size of 750 may not be sufficient to achieve this goal. The Prevention Magazine survey, for example, included a sample size of more than 1200 respondents. We urge the FDA to consider increasing its sample size or, and we believe that this would be preferable, conduct independent surveys of White, African American, and Hispanic patients including approximately 750 respondents in each of these groups.

Thank you,

Sandra M. Blalock  
President, Jackson Advertising Federation

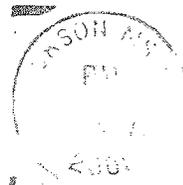
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