

107 Clay Street
Dayton, Ohio 45402-2907

May 22, 2001

Kimberly Topper
Center for Drug Evaluation and Research (HFD-21)
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

RE: Agenda item for June 14 and 15 Anesthetic and Life Support Drugs
Advisory Committee: Opiate Analgesics

Dear Ms. Topper,

Treating patients in pain places physicians in a difficult position. On one hand the patient reporting pain may have a real need, and it would be unethical to allow that person to suffer. On the other hand, the patient may be manipulating the physician to prescribe the narcotic for illegitimate purposes. Physicians cannot allow the vast majority of people to needlessly remain in pain because of the few people who abuse those drugs. Undertreated pain is still much more of a public health problem than misuse of prescription medication.

A decade ago, Talwin was being abused in a fashion similar to Oxycontin. Its manufacturers added naloxone to its tablets, preventing the narcotic euphoria when it was injected or snorted. When taken orally, the naloxone in the tablet is not absorbed, allowing the drug to exert its pain relieving effects. Purdue Pharma and others would do well to follow suit with their products. Not to do so with such a simple solution at hand would be irresponsible.

Sincerely,



Richard J. Wyderski, M.D.