



PULMONARY SPECIALTIES, P.C.

Bob J. Bleicher, M.D.
Ellen G. Miller, M.D.
John F. Trapp, M.D.

July 25, 2001

Kimberly Topper
Food and Drug Administration, CDER
Advisors and Consultants Staff, HFD-21
5600 Fishers Lane
Rockville, Maryland 20857

Re: Use of opiate analgesics for nonmalignant pain.

Dear Ms. Topper:

I am a practicing pulmonologist and medical director for a hospice.

I use long acting opiate analgesics in a number of my chronic lung patients for relief of dyspnea. It has been shown in a number of studies that the sustained release analgesics are critical in these patients because using short acting narcotics to relieve dyspnea results in too much respiratory depression and resultant carbon dioxide retention; where as when the long acting drugs are used, the relatively slow release provides a much safer way to administer these drugs with a good result in terms of relief of dyspnea and overall improvement in well being in these very anxious patients who are unable to catch their breath.

In addition, we use long acting opiate analgesics in a number of postoperative patients with chronic lung disease for the very same reason, in that we cause less respiratory depression due to the sustained release formulation.

I beg you to consider the fact that these drugs should not be removed from the market for any reason. If anything their abuse potential is less than that of the short acting drugs because drugs with a long half-life tend to "auto wean" and don't give the same high that the short released analgesic produce, so patients tend to become less addicted to their effects.

I am greatly concerned about any mention of withdrawal of these medicines from the market because of their abuse. I believe there are people who will abuse narcotics no matter what laws are passed, but to deny these extremely valuable drugs to the vast majority of sick patients who could benefit from them because of concerns regarding abuse makes absolutely no sense in my mind.

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Kimberley Topper
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I appreciate your attention to this matter.

Yours truly,

A handwritten signature in black ink, appearing to read "Bob J. Bleicher". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Bob J. Bleicher, MD

BJB/gn 07/26/01

cc: Robert F. Reder, M.D.
Vice President, Medical Affairs
And Worldwide Drug Safety
Purdue Pharma L.P.
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