

5146 '00 FEB -1 A10 :26

Comments of United Parcel Service

Before the
Department of Health and Human Services
Food and Drug Administration

Prescription Drug Marketing Act of 1987 (PDMA) as
modified by the Prescription Drug Amendments of 1992 (PDA)
and the FDA Modernization Act of 1997 (the Modernization Act)
(21 CFR Parts 203 and 205)

Docket Nos. 92N-0297 and 88N-0258
RIN 0910-AA08



Danielle Prescott
Strategic Accounts

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United Parcel Service
55 Glenlake Parkway, NE
Atlanta, GA 30328

January 31, 2000

88N-0258

086

United Parcel Service, Inc. ("UPS") respectfully submits the following comments in response to the Notice of Final Rulemaking request for comments, Food and Drug Administration (FDA) 21 CFR Parts 203 and 205 Docket Number 92N-0297 and 88N-0258 RIN 0910-AA08.

As the world leader in package and document delivery, UPS has successfully delivered millions of pharmaceutical sample shipments from leading manufacturers, wholesalers, distributors and fulfillment houses to doctors, practitioners, medical facilities and salespeople across the country.

Both UPS and its customers have invested heavily in technology to where today we not only communicate electronically but can download, sort, marry and store huge amounts of data which is all instantaneously retrievable in any format on demand.

Our customers continue to tell us they view their use of UPS and our exclusive Delivery Confirmation Information Vendor, Parcelink, to be the most complete service available in the marketplace today offering a "closed loop" delivery with the highest degree of compliance attainable.

Years ago, when a paper document (Acknowledgement of Delivery) was used, the closure rate for pharmaceutical sample shipments was perhaps at best 35-40% based on the return of the paper document. Multiple telephone calls or mailings seeking closure of these shipments perhaps yielded another 25-30% acknowledgement of receipt but only after much time and expense on the part of the shipper.

Today's rules and regulations that our pharmaceutical customers operate under result in hundreds and thousands of shipments daily containing the correct product and dosage as requested by the licensed recipient.

The secured electronic exchange of data between UPS and its customers is received and stored awaiting the electronic capture of the recipient's signature. This information is married and held for 5 years and is accessible and retrievable by our customers at any time.

We understand and completely support the FDA's concern and desire for information to determine whether sample diversion has occurred. We ask only that an electronic capture system such as the one we offer to our pharmaceutical customers be an acceptable method to meet the FDA's informational needs.

Please refer to our presentation attached for more details and supporting compliance statistics of our current process.

We thank you again for the opportunity to comment on the final rule and should you have any comments or questions or require additional information please contact either Theresa Giordanengo, Vice President of Strategic Accounts at (404) 828-7086 or e-mail at tgiordanengo@ups.com or Danielle Prescott, Strategic Accounts Manager at (404) 828-8094 or email at dprescott@ups.com.

Respectively submitted,

United Parcel Service

5147 '00 FEB -1 AIO :26

**United Parcel Service
Technology Update**

Re:

**Delivery of Pharmaceutical
Sample Shipments**

January 31, 2000

*UPS, ParceLink and our
Pharmaceutical Customers work
closely together in the business of
preparing, shipping and accounting
for hundreds of thousands of sample
shipments.*

*We believe that together we
have taken accountability and
compliance to the highest possible
level.*

*Pharmaceutical Sample Shipments
Checks & Balances*

1. Request is received from the Doctor
2. Pharmaceutical Co **VERIFIES** License of Doctor
3. Pharmaceutical Co. Processes order:
 - Pick & Pack
 - Internal Audit
 - Applies **ADULT SIGNATURE REQUIRED** LABEL
 - Includes packing list
 - **SEALS** & STAGES CARTONS FOR CARRIER PICKUP

Pharmaceutical Sample Shipments Checks & Balances

4. Pharmaceutical Co. electronically downloads to ParceLink over a **SECURE DATA LINK**

- **ORDER FILE**
- **SHIPPING FILE**

These files typically contain: Name, address, city, state, zip, Phone #, Package weight, charges, Tracking #, product quantity, product Name, dosage, lot number, Expiration date, etc.

5. ParceLink verifies receipt of data
 - Exceptions (if any) are noted

Pharmaceutical Sample Shipments Checks & Balances

6. Package in transit by UPS

- ParceLink receives status records from UPS (*secured data line*)

7. UPS delivers package

- *OBTAINS SIGNATURE*
- *ENCRYPTED* and stored in *DIAD* board
- Sends ParceLink:
 - *DATE & TIME OF DELIVERY*
 - *ENCRYPTED SIGNATURE OF PERSON RECEIVING PACKAGE*
 - *CLARIFIED NAME OF PERSON RECEIVING PACKAGE*

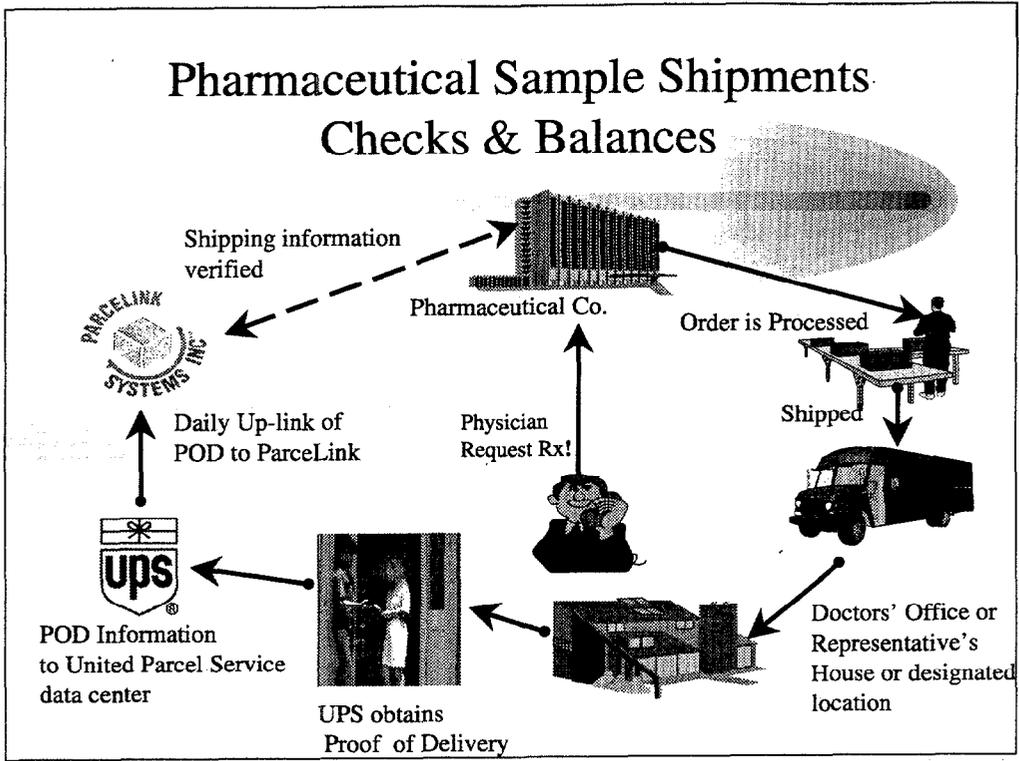
*Pharmaceutical Sample Shipments
Checks & Balances*

8. ParceLink **MARRIES** delivery data to order file & shipping file **(CLOSED LOOP SYSTEM)**
9. Tracers are **PROACTIVELY** generated by ParceLink if needed
10. Customized letter on any package with **PROOF OF DELIVERY** Signature
 - Written response scanned to customer **SECURE DATA BASE**

*Pharmaceutical Sample Shipments
Checks & Balances*

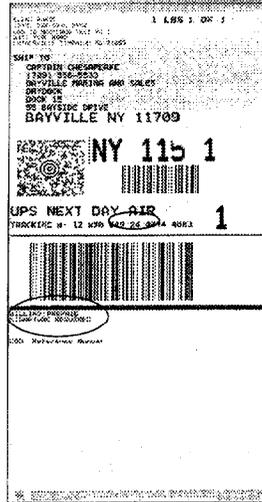
11. Any **EXCEPTIONS** are noted to Pharmaceutical Co by ParceLink via various reports
12. All information is stored a minimum of **5 YEARS**
13. All information is retrievable by the customer **ON DEMAND**
14. Data integrity throughout this process is **MAINTAINED & SECURE**

Pharmaceutical Sample Shipments Checks & Balances



Pharmaceutical Sample Shipments Checks & Balances

- When Delivery Confirmation is selected as an option on a UPS approved manifest system, a 1Z barcode like the one to the right is produced.
- A signature is required to be collected by the UPS Driver.



Pharmaceutical Sample Shipments Checks & Balances

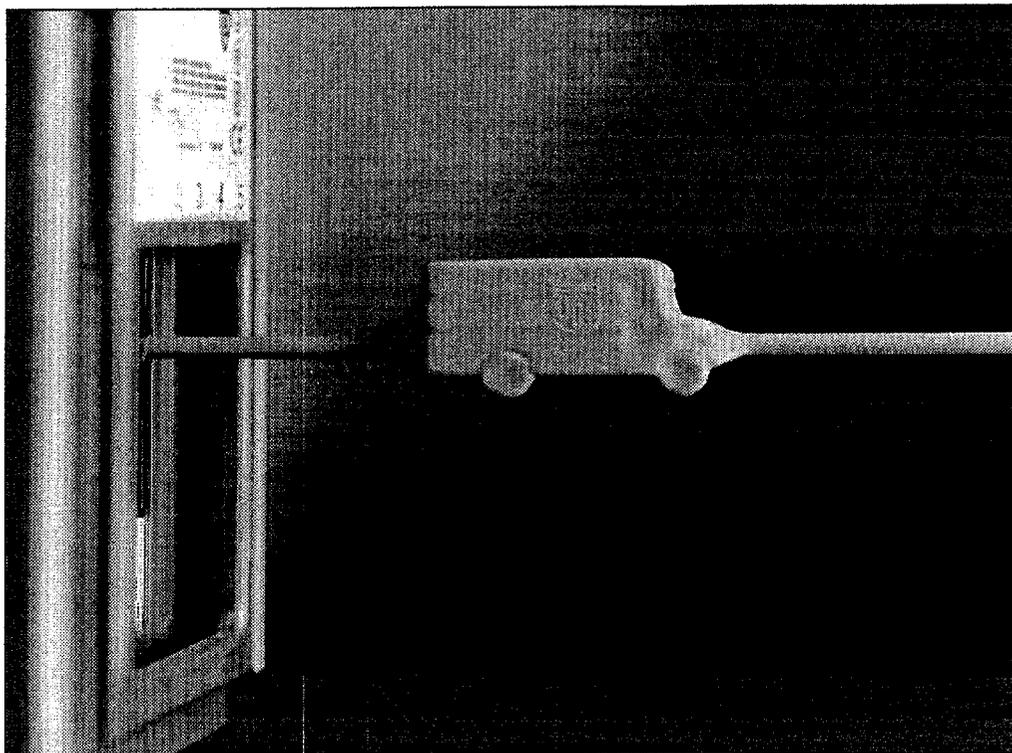
- If a UPS Driver tries to complete the stop without a signature, the following prompt, circled on the right picture will appear.
- This functionality is based upon special UPS 1Z barcode that requires a signature when the UPS Delivery Confirmation barcodes are scanned by the electronic UPS Delivery Boards.

Street #	Stre	Need Signature
100	PB BALTIMORE ZI	
1	Col Amt	Ship # ID#
1		*0049 003
		Remark

** UPS and our Pharmaceutical customers feel that together we have a system in place that is complete, compliant, secure, and user friendly that meets and exceeds all of the informational requirements desired by the FDA.*

** We can satisfy any audit requirement whether it's 2 business days, 48 hours or On Demand.*

** Our electronic technology is state of the art and certainly supports the intent of the government's Paper Reduction Act of 1995.*



09/09/1994
10:13:43

DELIVERY CONFIRMATION VERIFICATION NOTICE

PARCEL WAS SHIPPED TO:

TOM SMITH MD
222 SECOND STREET
ATTN: BOB DOUGLAS
DOWNERS GROVE, IL 60515

SIGNATURE #
PACKING LIST CONTENTS #

#####

DEA NUMBER 12345654321

* THIS RESPONSE CONTAINS THE INFORMATION RECORDED ON THE DELIVERY *
* CONFIRMATION REQUEST AT THE TIME OF DELIVERY, INCLUDING THE *
* RECEIVER'S NAME, ANY PERTINENT REMARKS, AND THE DATE THE PACKAGE *
* WAS DELIVERED. *

ORDER NO SHIPPED ON DELIVERED LICENSE NUMBER
1993-100 08/13/1993 08/17/1993 D0773593285

SHIP QTY	ITEM NUMBER	DESCRIPTION	LOT NUMBER
5	157388	ASPIRIN #3	571218
5	58462326	ANTI HISTIMINE	43545226
5	7431452	COLD CAPSULES	0987336
5	537151588	INHALER	43958366
5	887264	BLISTER PACK	091327436
5	9987233	ANTACID	9176464
5	2645644	ANALGESIC	84372543
5	2846745	ASPIRIN # 44	458736
5	23982365	RUBBING COMPOUND	4322
5	2390376	HAY FEVER CAPSULES	435562212
5	198723	INHALER COMBO	82255
5	87655	ANTACID 50MG TABLETS	22223
5	843625	INHALER KIT	938225

RECEIVED BY DR. T. SMITH

PARCEL SIGNED FOR BY:

Dr. Tom Smith

11/14/97

1Z6E22254203663214

IMPORTANT NOTICE REGARDING LEGAL COMPLIANCE

YOUR COMPANY NAME HERE
% ParcelLink Systems, Inc.
855 East Golf Road Suite 1139
Arlington Heights, IL 60005

BOB JONES, MD
FOR: BILL JONES
3243 E DOCK STE 303
CHICAGO, IL 60028

BOB JONES, MD:

Below is a description of either trade or direct mail samples you previously requested. Our records show that you received the order on . However we have not received a signed receipt to confirm delivery. Under the Prescription Drug Marketing Act we must obtain a written receipt for these samples before we can release your next order.

If the sample described below was in fact received, please sign and date your acknowledgement of delivery below and return this form in the enclosed self-addressed stamped envelope. If not received, please note that instead.

We appreciate your cooperation and look forward to hearing from you soon.

YOUR COMPANY NAME HERE

Order #	00399778	Date Ordered	10/01/1997
		Date Shipped	10/02/1997
		Date Received	

Quantity Shipped	Stock #	Description
3	0307-10	ASPRIN 500MG TABLETS

Please sign in box
if Sample Received
Date: _____

1Z6E22254203663214

UPS YEAR TO DATE PERFORMANCE BY CUSTOMER FOR 1998

	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
SHIPPER NAME: [REDACTED]													
SHIPPER NUMBER: [REDACTED]													
MONTHLY VOLUME:				258			3,871	5,058	4,766	5,160	5,937	3,784	28,834
POD'S:				258			3,862	5,048	4,759	5,155	5,933	3,782	28,797
UNRESOLVED:												2	2
LDI'S:							9	10	7	5	4		35
% LDI'S:	.00	.00	.00	.00	.00	.00	.23	.20	.15	.10	.07	.00	.12
% RESOLVED:	.00	.00	.00	100.00	.00	.00	100.00	100.00	100.00	100.00	100.00	99.95	99.99
TRACES:							44	48	42	45	45	19	243
% TRACES:	.00	.00	.00	.00	.00	.00	1.14	.95	.88	.87	.76	.50	.84
SHIPPER NAME: [REDACTED]													
SHIPPER NUMBER: [REDACTED]													
MONTHLY VOLUME:							1,117	2,320	2,305	2,779	2,532	2,687	13,740
POD'S:							1,116	2,316	2,301	2,770	2,531	2,687	13,721
UNRESOLVED:													
LDI'S:							1	4	4	9	1		19
% LDI'S:	.00	.00	.00	.00	.00	.00	.09	.17	.17	.32	.04	.00	.14
% RESOLVED:	.00	.00	.00	.00	.00	.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
TRACES:							9	21	12	21	14	6	83
% TRACES:	.00	.00	.00	.00	.00	.00	.81	.91	.52	.76	.55	.22	.60
SHIPPER NAME: [REDACTED]													
SHIPPER NUMBER: [REDACTED]													
MONTHLY VOLUME:	11	1,394	1,961	2,173	4,723	2,223	5,096	4,757	4,054	3,282	4,128	3,951	37,753
POD'S:	11	1,394	1,957	2,173	4,722	2,221	5,091	4,754	4,049	3,277	4,127	3,950	37,726
UNRESOLVED:												1	1
LDI'S:			4		1	2	5	3	5	5	1		26
% LDI'S:	.00	.00	.20	.00	.02	.09	.10	.06	.12	.15	.02	.00	.07
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	99.97	100.00
TRACES:				16	49	18	52	58	25	24	47	21	310
% TRACES:	.00	.00	.00	.74	1.04	.81	1.02	1.22	.62	.73	1.14	.53	.82
SHIPPER NAME: [REDACTED]													
SHIPPER NUMBER: [REDACTED]													
MONTHLY VOLUME:							3,173	4,921	5,652	5,968	5,095	6,460	31,269
POD'S:							3,172	4,918	5,646	5,964	5,095	6,460	31,255
UNRESOLVED:													
LDI'S:							1	3	6	4			14
% LDI'S:	.00	.00	.00	.00	.00	.00	.03	.06	.11	.07	.00	.00	.04
% RESOLVED:	.00	.00	.00	.00	.00	.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
TRACES:							37	68	41	34	27	39	246
% TRACES:	.00	.00	.00	.00	.00	.00	1.17	1.38	.73	.57	.53	.60	.79
SHIPPER NAME: [REDACTED]													
SHIPPER NUMBER: [REDACTED]													
MONTHLY VOLUME:				3,399	4,784	5,500	6,894	5,018	7,036	6,056	5,294	6,521	50,502
POD'S:				3,398	4,775	5,492	6,876	5,007	7,018	6,045	5,291	6,521	50,423
UNRESOLVED:													
LDI'S:				1	9	8	18	11	18	11	3		79
% LDI'S:	.00	.00	.00	.03	.19	.15	.26	.22	.26	.18	.06	.00	.16
% RESOLVED:	.00	.00	.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
TRACES:		3	30	22	67	75	83	55	70	61	34	41	541
% TRACES:	.00	.00	.00	.65	1.40	1.36	1.20	1.10	.99	1.01	.64	.63	1.07

	UPS YEAR TO DATE PERFORMANCE BY CUSTOMER FOR 1998												
	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
TOTALS:													
MONTHLY VOLUME:	11	1,394	1,961	5,830	9,507	7,723	20,151	22,074	23,813	23,245	22,986	23,403	162,098
POD's:	11	1,394	1,957	5,829	9,497	7,713	20,117	22,043	23,773	23,211	22,977	23,400	161,922
UNRESOLVED:												3	3
LDI's:			4	1	10	10	34	31	40	34	9		173
% LDI's:	.00	.00	.20	.02	.11	.13	.17	.14	.17	.15	.04	.00	.11
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	99.99	100.00
TRACES:		3	30	38	116	93	225	250	190	185	167	126	1,423
% TRACES:	.00	.22	1.53	.65	1.22	1.20	1.12	1.13	.80	.80	.73	.54	.88

JANUARY FEBRUARY MARCH APRIL MAY JUNE JULY AUGUST SEPTEMBER OCTOBER NOVEMBER DECEMBER TOTAL

SHIPPER NAME: [REDACTED]
SHIPPER NUMBER: [REDACTED]

MONTHLY VOLUME:	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
POD's:	7,980	6,195	5,368	7,855	5,355	4,076	6,350	4,693	3,066	8,781	9,691	8,781	69,410
UNRESOLVED:	7,972	6,189	5,358	7,852	5,346	4,071	6,340	4,688	3,062	8,778	9,688	8,778	69,344
LDI's:	8	6	10	3	9	5	10	5	4	3	3	3	66
% LDI's:	.10	.10	.19	.04	.17	.12	.16	.11	.13	.03	.03	.00	.10
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
TRACES:	55	34	47	39	38	34	57	55	23	68	60	50	510
% TRACES:	.69	.55	.88	.50	.71	.83	.90	1.17	.75	.77	.62	.62	.73

SHIPPER NAME: [REDACTED]
SHIPPER NUMBER: [REDACTED]

MONTHLY VOLUME:	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
POD's:	3,288	2,832	3,385	3,069	2,510	2,535	3,449	4,452	3,244	3,878	3,059	3,878	35,701
UNRESOLVED:	3,285	2,828	3,379	3,069	2,509	2,533	3,445	4,447	3,239	3,873	3,056	3,873	35,663
LDI's:	3	4	6	6	1	2	4	5	5	5	3	5	38
% LDI's:	.09	.14	.18	.00	.04	.08	.12	.11	.15	.13	.10	.13	.11
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
TRACES:	14	11	24	7	8	12	13	19	16	14	27	14	165
% TRACES:	.43	.39	.71	.23	.32	.47	.38	.43	.49	.36	.88	.36	.46

SHIPPER NAME: [REDACTED]
SHIPPER NUMBER: [REDACTED]

MONTHLY VOLUME:	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
POD's:	4,940	4,074	4,802	4,707	3,915	3,973	5,249	4,420	1,980	3,643	32	3,643	41,735
UNRESOLVED:	4,936	4,070	4,796	4,699	3,905	3,968	5,243	4,409	1,977	3,640	25	3,640	41,668
LDI's:	4	4	6	8	10	5	6	11	3	3	7	3	60
% LDI's:	.08	.10	.12	.17	.26	.13	.11	.25	.15	.08	.00	.08	.14
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	78.13	100.00	99.98
TRACES:	22	28	26	24	46	27	43	44	13	22	22	22	295
% TRACES:	.45	.69	.54	.51	1.17	.68	.82	1.00	.66	.60	.00	.60	.71

SHIPPER NAME: [REDACTED]
SHIPPER NUMBER: [REDACTED]

MONTHLY VOLUME:	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
POD's:	451	451	451	451	451	451	451	451	451	451	451	451	2,307
UNRESOLVED:	451	451	451	451	451	451	451	451	451	451	451	451	2,306
LDI's:	1	1	1	1	1	1	1	1	1	1	1	1	1
% LDI's:	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.05	.05	.04
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
TRACES:	345	345	345	345	345	345	345	345	345	345	345	345	345
% TRACES:	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77	.77

SHIPPER NAME: [REDACTED]
SHIPPER NUMBER: [REDACTED]

MONTHLY VOLUME:	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
POD's:	6,413	6,444	6,759	6,766	5,859	7,711	7,468	12,619	9,438	14,422	12,224	14,412	96,123
UNRESOLVED:	6,412	6,437	6,756	6,763	5,857	7,709	7,462	12,608	9,434	14,412	12,221	14,412	96,071
LDI's:	1	7	3	3	2	2	6	11	4	10	3	10	52
% LDI's:	.02	.11	.04	.04	.03	.03	.08	.09	.04	.07	.02	.07	.05
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
TRACES:	26	46	37	35	33	36	55	138	73	126	95	126	700
% TRACES:	.41	.71	.55	.52	.56	.47	.74	1.09	.77	.87	.78	.87	.73

	UPS YEAR TO DATE PERFORMANCE BY CUSTOMER FOR 1999												
	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
SHIPPER NAME:	[REDACTED]												
SHIPPER NUMBER:	[REDACTED]												
MONTHLY VOLUME:	7,509	7,287	7,513	6,124	6,595	7,255	8,449	8,556	6,925	7,957	905		75,075
POD'S:	7,502	7,281	7,504	6,119	6,588	7,251	8,438	8,551	6,915	7,951	905		75,005
UNRESOLVED:													
LDI'S:	7	6	9	5	7	4	11	5	10	6			70
% LDI'S:	.09	.08	.12	.08	.11	.06	.13	.06	.14	.08	.00	.00	.09
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	.00	100.00
TRACES:	50	56	68	53	69	67	96	86	88	62	3		698
% TRACES:	.67	.77	.91	.87	1.05	.92	1.14	1.01	1.27	.78	.33	.00	.93
TOTALS:													
MONTHLY VOLUME:	30,130	26,832	27,827	28,521	24,234	25,550	30,965	34,740	24,653	39,132	27,767		320,351
POD'S:	30,107	26,805	27,793	28,502	24,205	25,532	30,928	34,703	24,627	39,105	27,750		320,057
UNRESOLVED:											7		7
LDI'S:	23	27	34	19	29	18	37	37	26	27	10		287
% LDI'S:	.08	.10	.12	.07	.12	.07	.12	.11	.11	.07	.04	.00	.09
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	99.97	.00	100.00
TRACES:	167	175	202	158	194	176	264	342	213	292	530		2,713
% TRACES:	.55	.65	.73	.55	.80	.69	.85	.98	.86	.75	1.91	.00	.85

B 78

01/19/2000 13:58:03

PAGE NO 1

UPS YEAR TO DATE PERFORMANCE BY CUSTOMER FOR 1998

UPSPERF1
TOTAL

	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
SHIPPER NAME: [REDACTED]													
SHIPPER NUMBER: [REDACTED]													
MONTHLY VOLUME:	4,710	4,988	8,848	6,271	6,010	9,026	6,459	5,169	6,747	5,165	4,728	4,918	73,039
POD'S:	4,708	4,984	8,841	6,264	6,007	9,024	6,456	5,164	6,747	5,165	4,723	4,913	72,996
UNRESOLVED:								5			5	5	15
LDI'S:	2	4	7	7	3	2	3						28
% LDI'S:	.04	.08	.08	.11	.05	.02	.05	.00	.00	.00	.00	.00	.04
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	99.90	100.00	100.00	99.89	99.90	99.98
TRACES:	74	106	120	101	65	90	77	62	45	50	49	40	879
% TRACES:	1.57	2.13	1.36	1.61	1.08	1.00	1.19	1.20	.67	.97	1.04	.81	1.20
TOTALS:													
MONTHLY VOLUME:	4,710	4,988	8,848	6,271	6,010	9,026	6,459	5,169	6,747	5,165	4,728	4,918	73,039
POD'S:	4,708	4,984	8,841	6,264	6,007	9,024	6,456	5,164	6,747	5,165	4,723	4,913	72,996
UNRESOLVED:								5			5	5	15
LDI'S:	2	4	7	7	3	2	3						28
% LDI'S:	.04	.08	.08	.11	.05	.02	.05	.00	.00	.00	.00	.00	.04
% RESOLVED:	100.00	100.00	100.00	100.00	100.00	100.00	100.00	99.90	100.00	100.00	99.89	99.90	99.98
TRACES:	74	106	120	101	65	90	77	62	45	50	49	40	879
% TRACES:	1.57	2.13	1.36	1.61	1.08	1.00	1.19	1.20	.67	.97	1.04	.81	1.20

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UPS YEAR TO DATE PERFORMANCE BY CUSTOMER FOR 1999

	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
SHIPPER NAME:	[REDACTED]												
SHIPPER NUMBER:	[REDACTED]												
MONTHLY VOLUME:	3,504	1,249	51	50	2,638	4,369	7,145	3,119	2,896	3,183	3,851		32,055
POD'S:	3,503	1,248	51	50	2,638	4,366	7,145	3,119	2,895	3,183	3,845		32,043
UNRESOLVED:		1							1		6		8
LDI'S:	1					3							4
% LDI'S:	.03	.00	.00	.00	.00	.07	.00	.00	.00	.00	.00	.00	.01
% RESOLVED:	100.00	99.92	100.00	100.00	100.00	100.00	100.00	100.00	99.97	100.00	99.84	.00	99.98
TRACES:	31	17	1		22	61	98	33	30	34	21		348
% TRACES:	.88	1.36	1.96	.00	.83	1.40	1.37	1.06	1.04	1.07	.55	.00	1.09
TOTALS:													
MONTHLY VOLUME:	3,504	1,249	51	50	2,638	4,369	7,145	3,119	2,896	3,183	3,851		32,055
POD'S:	3,503	1,248	51	50	2,638	4,366	7,145	3,119	2,895	3,183	3,845		32,043
UNRESOLVED:		1							1		6		8
LDI'S:	1					3							4
% LDI'S:	.03	.00	.00	.00	.00	.07	.00	.00	.00	.00	.00	.00	.01
% RESOLVED:	100.00	99.92	100.00	100.00	100.00	100.00	100.00	100.00	99.97	100.00	99.84	.00	99.98
TRACES:	31	17	1		22	61	98	33	30	34	21		348
% TRACES:	.88	1.36	1.96	.00	.83	1.40	1.37	1.06	1.04	1.07	.55	.00	1.09

/23/
2:53:34
LOCATION:99

YOU COMPANY NAME "ER"
DELIVERY MANIFEST REPORT
FOR ZIP CODE 60515

DATE NO
FROM: 01/01/1993 TO: 12/31/1994

LICENSE #	ORDER #	DEA NUMBER	SHIP TO DOCTOR'S NAME	ADDRESS/CITY STATE ZIP	SHIP DATE	EXP DELIV	ACT DELIV	WT	RECEIVED BY
D0773593374	1993-194	9998887771	JONES, BOB MD	123 MAIN STREET DOWNERS GROVE IL 60515	08/20/1993	08/25/1993	08/24/1993	-1	1 DR. B. JONES

Dr Bob Jones

SEQ	SHIP QTY	DESCRIPTION	PRODUCT NUMBER	LOT NUMBER
01	10	ASPIRIN #3	157388	571219

LICENSE #	ORDER #	DEA NUMBER	SHIP TO DOCTOR'S NAME	ADDRESS/CITY STATE ZIP	SHIP DATE	EXP DELIV	ACT DELIV	WT	RECEIVED BY
D0773593347	1993-179	9998887771	JONES, BOB MD	123 MAIN STREET DOWNERS GROVE IL 60515	08/18/1993	08/19/1993	08/19/1993		3 DR. JONES

Dr Jones

SEQ	SHIP QTY	DESCRIPTION	PRODUCT NUMBER	LOT NUMBER
01	10	ASPIRIN #3	157388	571218

LICENSE #	ORDER #	DEA NUMBER	SHIP TO DOCTOR'S NAME	ADDRESS/CITY STATE ZIP	SHIP DATE	EXP DELIV	ACT DELIV	WT	RECEIVED BY
D0773593301	1993-150	9998887771	JONES, BOB MD	123 MAIN STREET DOWNERS GROVE IL 60515	08/16/1993	08/19/1993	08/19/1993		2 S. MILLER

Sue Miller RN

SEQ	SHIP QTY	DESCRIPTION	PRODUCT NUMBER	LOT NUMBER
01	10	ASPIRIN #3	157388	571218

LICENSE #	ORDER #	DEA NUMBER	SHIP TO DOCTOR'S NAME	ADDRESS/CITY STATE ZIP	SHIP DATE	EXP DELIV	ACT DELIV	WT	RECEIVED BY
D0773593329	1993-162	33213435454	DOE, JOHN MD	828 MAPLE AVE. DOWNERS GROVE IL 60515	08/16/1993	08/19/1993	08/19/1993		1 DOE

Dr John Doe

SEQ	SHIP QTY	DESCRIPTION	PRODUCT NUMBER	LOT NUMBER
01	10	ASPIRIN #3	157388	571218

LICENSE #	ORDER #	DEA NUMBER	SHIP TO DOCTOR'S NAME	ADDRESS/CITY STATE ZIP	SHIP DATE	EXP DELIV	ACT DELIV	WT	RECEIVED BY
D0773593285	1993-100	12345654321	SMITH, TOM MD	222 SECOND STREET DOWNERS GROVE IL 60515	08/13/1993	08/16/1993	08/17/1993	+1	1 DR. T. SMITH

Dr Tom Smith

SEQ	SHIP QTY	DESCRIPTION	PRODUCT NUMBER	LOT NUMBER
01	5	ASPIRIN #3	157388	571218
02	5	ANTIHISTIMINE	58462326	43545226
03	5	COLD CAPSULES	7431452	0987336
04	5	INHALER	537151588	43958366
05	5	BLISTER PACK	887264	091327436
06	5	ANTACID	9987233	9176464
07	5	ANALGESIC	2645644	84372543
08	5	ASPIRIN # 44	2846745	458736
09	5	RUBBING COMPOUND	23982365	4322
10	5	HAY FEVER CAPSULES	2390376	435562212
11	5	INHALER COMBO	198723	82255
12	5	ANTACID SOMG TABLETS	87655	22223
13	5	INHALER KIT	843625	938225

UPS YEAR TO DATE PERFORMANCE BY CUSTOMER FOR 1998

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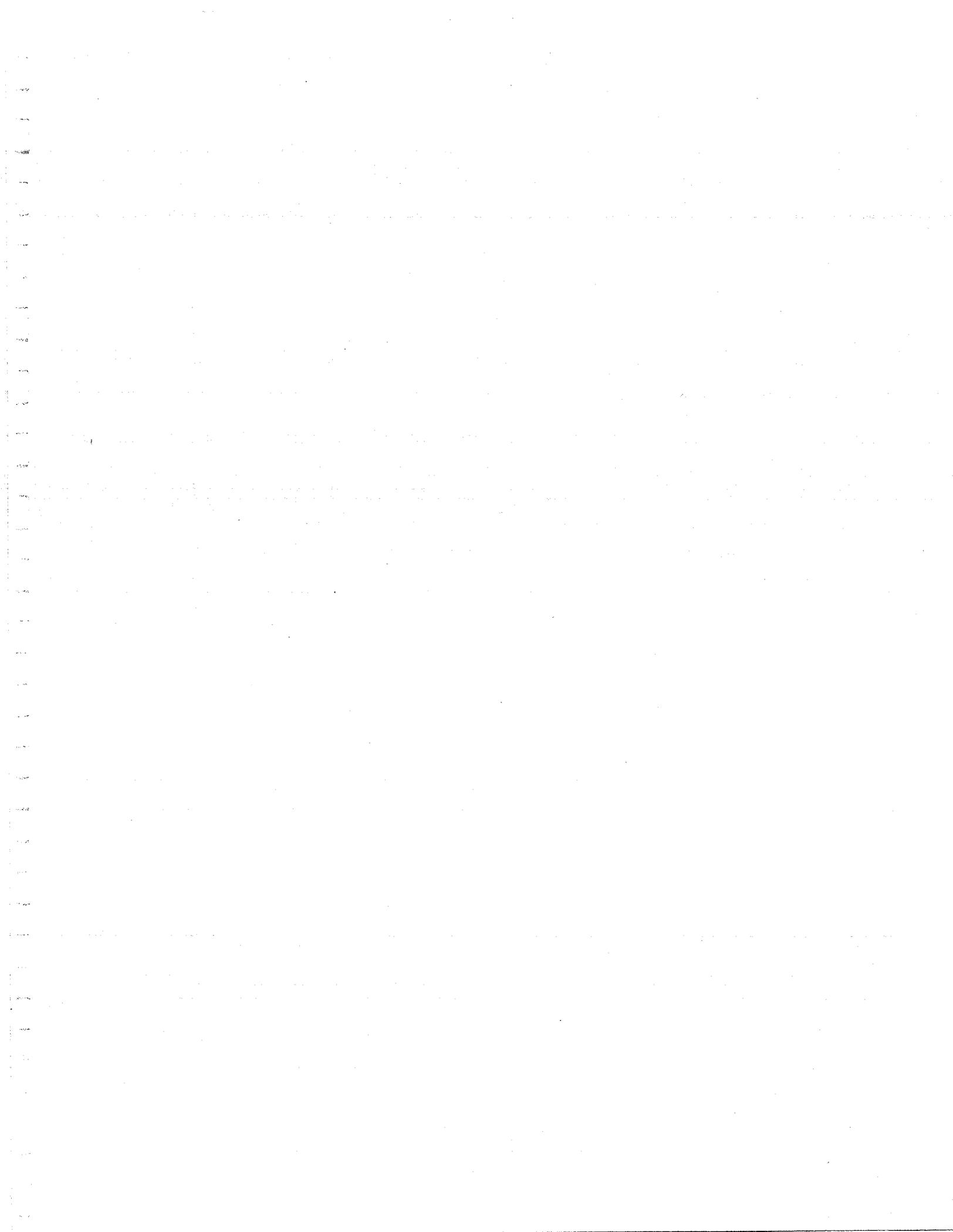
	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
TOTALS:													
MONTHLY VOLUME:	60,069	55,878	75,258	72,886	74,907	83,702	88,733	89,955	89,650	94,571	97,488	86,557	969,654
POD's:	59,211	55,391	75,076	72,783	74,772	83,474	88,476	89,752	89,465	94,379	96,921	86,389	966,089
UNRESOLVED:	743	380	80	16	24	36	115	71	70	46	516	154	2,251
LDI's:	115	107	102	87	111	192	142	132	115	146	51	14	1,314
% LDI's:	.19	.19	.14	.12	.15	.23	.16	.15	.13	.15	.05	.02	.14
% RESOLVED:	98.76	99.32	99.89	99.98	99.97	99.96	99.87	99.92	99.92	99.95	99.47	99.82	99.77
TRACES:	2,726	1,911	3,098	2,528	1,889	3,198	3,194	1,496	897	1,108	1,480	779	24,304
% TRACES:	4.54	3.42	4.12	3.47	2.52	3.82	3.60	1.66	1.00	1.17	1.52	.90	2.51

01/18/2000 03:59 PM

NAME:	ROY [REDACTED]	PKG TRACKING NO:	12 [REDACTED] 71218
	101 [REDACTED]	PICK DOC NO:	6648354
	[REDACTED]	CUSTNUM:	77773316185
		MI	[REDACTED]
SHIP DATE:	12/22/1999	PHONE:	
EXP. DELIV:	12/24/1999	DELIVERED:	12/27/1999
RECEIVED BY:	GRISWOLD	TSERV:	GTRK
SIGNATURE:	<i>D. Griswold</i>		
TRACER INFO:	NO TRACE ACTION TAKEN	WT:	1
SHIPCHRG:		MENUMBER:	
PACKAGE	CONTENTS:		
SHIP QTY:	LOT NUMBER:	DESCRIPTION:	ITEM NUMBER:
	[REDACTED]	[REDACTED]	[REDACTED]
		MAIN MENU	

UPS YEAR TO DATE PERFORMANCE BY CUSTOMER FOR 1999

	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
TOTALS:													
MONTHLY VOLUME:	100,105	100,878	110,546	101,007	96,749	114,151	114,892	113,304	89,752	104,245	131,706		1,177,335
POD's:	99,776	100,702	110,312	100,857	96,588	113,950	114,648	113,049	89,635	104,090	131,355		1,174,962
UNRESOLVED:	209	32	80	34	32	28	104	107	43	56	318		1,043
LDI's:	120	144	154	116	129	173	140	148	74	99	33		1,330
% LDI's:	.12	.14	.14	.11	.13	.15	.12	.13	.08	.09	.03	.00	.11
% RESOLVED:	99.79	99.97	99.93	99.97	99.97	99.98	99.91	99.91	99.95	99.95	99.76	.00	99.91
TRACES:	1,180	1,137	1,107	1,273	1,063	1,448	1,496	1,753	1,179	2,164	2,599		16,399
% TRACES:	1.18	1.13	1.00	1.26	1.10	1.27	1.30	1.55	1.31	2.08	1.97	.00	1.39



**HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION
CROSS REFERENCE SHEET**

Docket Number/Item Code: 92N-0297/OB1

See Docket Number/Item Code: 88N-0258/OB 6

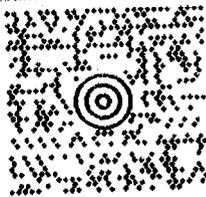
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1 OF 1

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ROCKVILLE MD 20857

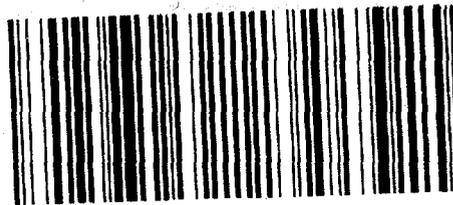


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