



**BELL MEDICAL SERVICES, INC.**  
EQUIPMENT & SUPPLIES FOR PHYSICIANS & INDUSTRY

6748 '00 MAY 16 P1:52

May 11, 2000

*Dockets Management Branch  
Food & Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, Md. 20857*

*Dear Sir/Madam;*

*Re: Docket Nos. 92N-0297 and 88N-0258*

*We are a licensed prescription drug wholesaler doing business primarily in three states with several national accounts*

*We purchase some of our inventory through two of the major full-line wholesale distributors.*

*We purchase approximately 30% of our inventory from smaller wholesale distributors who, in some cases, are not authorized distributors for the products they sell*

*We purchase directly from only three drug companies.*

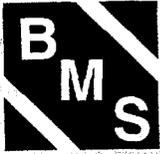
*We do not receive prescription drug pedigrees from full-line wholesalers or from manufacturers.*

*If we were required to provide prescription drug pedigrees that go back to the manufacturer to our customers, we could do so only in those instances where we have purchased directly from the manufacturer or purchased from an "unauthorized distributor" who is able to provide that complete information to us. However, those "unauthorized distributors" will not be able to do so unless they purchased directly from the manufacturer, which is rarely the case. Since we do much of our business with major full-line wholesalers who do not provide any pedigrees, and because most "unauthorized distributors will not be able to provide pedigrees back to the manufacturer, we will not be able lawfully to engage in 25% of the transactions we now engage in.*

*Our company services over 750 physicians, clinics, industrial sites and other customers.*

88N-0258

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*We have spoken with most of these customers and they do not do any business with a major full line wholesaler*

*Most of our customers have advised us that their business will be adversely affected if we are not able to supply them.*

*We have tried to become authorized distributors but our requests have been turned down, ignored, etc.*

*Our company employs 20 persons who will be put out of their jobs if the prescription drug pedigree requires that transactions be reported back to the manufacturer.*

*We support a return to the guidance issued by the FDA in August 1988 with respect to prescription drug pedigrees and authorized distributors.*

*Sincerely yours,*

*Fred Greenberg*  
President