

7175 '00 MAY 18 A10:39

ALLOCATION INC.  
52 PARK AVE  
PARK RIDGE, NJ 07656  
TEL 201 505-0400  
FAX 201 505-0891

10-May-00

DOCKETS MANAGEMENT BRANCH (HFA-305)  
FOOD AND 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 IN OVER 20 STATES

WE PURCHASE UP TO 25% OF OUR INVENTORY FROM SMALL WHOLESALE DISTRIBUTORS THAT MIGHT NOT BE AUTHORIZED DISTRIBUTORS FOR THE PRODUCTS THEY SELL

WE HAVE OVER THE YEARS ATTEMPTED TO OPEN DIRECT ACCOUNTS WITH OVER HALF A DOZEN MANUFACTURERS THAT HAVE TOLD US WE ARE TOO SMALL OR THEY HAVE ENOUGH COVERAGE IN OUR GEOGRAPHIC LOCATION

WE PURCHASE DIRECTLY FROM ONLY 8 DRUG COMPANIES

WE DO NOT RECEIVE PRESCRIPTION DRUG PEDIGREES FROM FULL - LINE WHOLESALERS OR FROM MANUFACTURERS

OUR COMPANY SERVICES OVER 40 DISTRIBUTION SITES THROUGHOUT THE UNITED STATES

IF OUR COMPANY WERE NOT SELLING THE CURRENT PHARMACEUTICALS IN QUESTION THEY WOULD HAVE TO BUY THEM FROM OTHER DISTRIBUTORS AT A HIGHER COST THAT WOULD RESULT IN HIGHER COSTS TO THE PUBLIC

WE SUPPORT A RETURN TO THE GUIDANCE ISSUED BY FDA IN AUGUST 1988 WITH RESPECT TO PRESCRIPTION DRUG PEDIGREES AND AUTHORIZED DISTRIBUTORS

SINCERELY YOURS  
*Allan J. Richman*  
ALLAN J. RICHMAN RPh  
PRESIDENT

88N-0258

C79

SEE FILE NO: 92N-0297/C66

FILE NO: 88N-0258/C79

CROSS FILE SHEET