



*The Catholic Center*  
at Rutgers University

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January 8, 2004

Mark B. McClellan, M.D., Ph.D.  
Commissioner, Food and Drug Administration  
5600 Fishers Lane  
Parklawn Bldg., Room 14-71  
Rockville, MD 20857

Dear Commissioner:

It has come to my attention that the FDA is considering a proposal to allow "morning-after" pills, which can interfere with pregnancy up to three days after intercourse, to be sold over-the-counter without a prescription. The specific drug in question, "Plan B," is a levonorgestrel-only pill that can act as a contraceptive or abortifacient. As you know, on December 16, 2003, two FDA advisory committees recommended that Plan B be made available over-the-counter. But the final decision is yours. I urge you not to approve over-the-counter availability of "morning-after" pills for the following reasons:

- The pill can have an abortifacient effect. Over-the-counter availability will lead to a greater assault on human life at its earliest stages, and evidence shows it will not reduce abortions at later stages.
- Many women who would be deeply concerned about any abortifacient effect are unaware of how this drug works. Over-the-counter availability without medical counseling risks violating their right to informed consent.
- Plan B's manufacturer says it should not be used routinely, but over-the-counter availability encourages just such use. This exposes women to the serious risks of birth control pills, without medical supervision.
- Plan B is associated with a heightened risk of ectopic pregnancy, a potentially fatal condition. The common side-effects of the "morning-after" pill (nausea and abdominal pain) are also the symptoms of an ectopic pregnancy and could therefore mask the presence of this potentially life-threatening condition.
- The potential for harm is especially grave in the case of minor girls. They (and the males sexually involved with them) will obtain the pills without ever seeing a physician or notifying parents.
- Over-the-counter availability of the pill would likely increase the pressure already being placed on pharmacies and pharmacists to violate their consciences.

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In short, to approve the proposals to allow "morning-after" pills to be sold over-the-counter without a prescription would be a grave mistake.

Thank you for your consideration of my concerns.

Sincerely,

A handwritten signature in cursive script that reads "Jean-Marie Dimech-Juchniewicz".

Jean-Marie Dimech-Juchniewicz, Chaplain  
The Catholic Center at Rutgers University

Cc: President George W. Bush