can ignore the many important contributions the drug companies have made, but the intrusion by the industry into the education, perhaps it would be more accurate to say the almost complete takeover by the industry of postgraduate medical "education," is cause for alarm.

The London Observer on October 1, 1967, stated in its comments on the Sainsbury Committee's report on the pharmaceutical industry:

> Far more alarming is the basic conflict between the aims of the industry and those of good medical practice. The industry must seek to maximize consumption of its products; doctors (good doctors at any rate) seek to minimize it.

Dr. Richard Crout, Director of FDA's Bureau of Drugs and one of today's witnesses, told the Pharmaceutical Advertising Club on January 17, 1974, that:

> In any discussion of drug advertising, it is important to recognize that the intrinsic objectives of the advertiser are by nature in conflict with certain principles of good therapeutics. The principle of parsimony in exposing patients to drugs is an obstacle to the sales objectives of the drug industry, and it is unrealistic to expect the industry to promote this principle with enthusiasm.

Given this irreconcilable conflict between the interests of the drug industry and what medical experts regard as good medical practice, how can we trust any program sponsored by the industry as being educational rather than promotional?

This is, in short, the subject of these hearings. Specifically, we shall inquire about the various "educational" courses offered to the medical profession, their contents and sponsorship; how "education" is distinguished from advertising and the resulting regulatory problems; the identification of individuals who select the program content; whether the postgraduate "education" which doctors receive is reflected in drug prescribing practices; the general problem of the transfer of medical information to doctors; the role of advertising companies in medical "education"; the pretesting of drug advertising, and the measurement of the doctors' response to it; the purpose and content of commercial and scientific exhibits at medical conventions, the dependence of conventions on drug-company-supported exhibits; the effect on competition and small business.

Our witness today is Dr. Richard Crout, Director of the Bureau of Drugs, Food and Drug Administration, the Public Health Service of the Department of HEW.

Dr. Crout, please identify for the reporter your associates so that the record will be accurate.

STATEMENT OF J. RICHARD CROUT, M.D., DIRECTOR, BUREAU OF DRUGS, FOOD AND DRUG ADMINISTRATION, ACCOMPANIED BY PETER H. RHEINSTEIN, M.D., DIRECTOR, DIVISION OF DRUG ADVERTISING, BUREAU OF DRUGS, FDA; AND WILLIAM W. VODRA, ASSOCIATE CHIEF COUNSEL FOR DRUGS, FDA

Dr. CROUT. Thank you very much, Mr. Chairman.

I am accompanied this morning by Dr. Peter Rheinstein on my right who is Director of the Division of Drug Advertising of the Bureau of Drugs, Food and Drug Administration, and by Mr. William Vodra on my left who is Associate Chief Counsel for Drugs for the Food and Drug Administration.