

planned Pfizer exhibit, if actually presented, would have properly been termed "drug labeling," by any reasonable description, and thus subject to the full disclosure and fair balance standards applicable to such labeling.

The second error occurred during Dr. Rheinstein's testimony. In response to your question regarding the selection of the physician panels for the Pfizer-sponsored closed circuit television symposium on diabetes, Dr. Rheinstein replied that "Pfizer contracted with another company called Health Learning Systems to do the entire production." (Testimony at page 22.) Also in response to another question Dr. Rheinstein indicated "And previous seminars sponsored by Health Learning Systems have said that they had up to 8,000 physicians seeing closed circuit broadcasts at one time." (Testimony at page 24.) Subsequent to this hearing, it was learned that Pfizer did not contract with any outside company but made all arrangements including the selection of physician panels staff itself. Health Learning Systems produces multi-city closed circuit TV programs on medical subjects, but was not involved in this program.

Sincerely yours,

J. Richard Crout, M.D.
Director
Bureau of Drugs

cc: Pfizer, Inc.
Health Learning Systems