

14892 COMPETITIVE PROBLEMS IN THE DRUG INDUSTRY

As this Committee is aware, the Food and Drug Administration has found our anorectic products to be safe and effective and, in our judgment, we have continued to achieve very satisfactory compliance with the regulatory standards and programs which are the responsibility of the Drug Enforcement Administration.

We believe that you should find the factual evidence on the prescription dosage units of our products, per patient, to be consistent with their use as a short-term aid to the medically supervised obese patient.

We do not believe there is any probative evidence that our anti-obesity products show any meaningful statistical or other factual evidence of abuse.

We recognize that in a population of 215 million Americans there is a very small but highly visible segment who are troubled and who may be determined to misuse or abuse legitimate products.

We believe, however, that the safety, effectiveness and judicious prescription of anti-obesity products cannot reasonably be condemned by the very limited factual evidence of their statistically quite infrequent misuse.

The Congress and 42 state legislatures have created, and the FDA, DEA and State agencies administer, monitor and enforce sophisticated and effective programs designed to ensure proper medically supervised use of anorectic products.

We fully support these programs and cooperate readily with these agencies.

We believe that a scientific, technical or legal analysis fully and fairly considered, on the basis of factual rather than hearsay evidence,