

15448 COMPETITIVE PROBLEMS IN THE DRUG INDUSTRY

may be viewed as a useful standard for comparison, since it has the virtual blessings of an important government agency, it is based in large part on the advice of distinguished nongovernmental experts, it is widely distributed to physicians and frequently used by them, and the drug industry--although it may dispute certain FDA decisions--has learned to live with them, and to live with them without substantial financial trauma.

Second, it must be clearly understood that PDR and the Latin American reference books are not the same. In PDR, the statements presumably have governmental approval. The promotional statements in the Latin American books, however, do not have official approval from any governmental agency; they say what the company wants to say.

There is still one other exception. In Argentina, the statements are written not by the companies but by the editors. Accordingly, the companies bear no responsibility for this promotional material.

Comparison of the drug promotion shows two facts beyond dispute:

1. In the United States, the promotional claims for efficacy--the indications for use--are generally brief. In most cases, they conform to the views expressed in standard textbooks of pharmacology and in such authoritative and internationally-recognized works as Goodman and Gilman's The Pharmacological Basis of Therapeutics and the AMA's AMA Drug Evaluations. In contrast, in the