

16576 COMPETITIVE PROBLEMS IN THE DRUG INDUSTRY

Sidney M. Wolfe, M.D. and)
Public Citizen Health)
Research Group)

Petitioners

TO: Honorable Griffin Bell
Attorney General of the United States; and

Honorable Peter Bensinger, Administrator
Drug Enforcement Administration, Department of Justice

PETITION REQUESTING TRANSFER OF THE NARCOTIC DEXTROPROPOXYPHENE
(DARVON) AND ITS SALTS FROM CONTROLLED SUBSTANCES SCHEDULE
IV TO SCHEDULE II.

TABLE OF CONTENTS

I. PETITIONERS.....	1
II. AUTHORITY FOR PETITIONERS.....	1
III. THE CASE.....	1
IV. INTRODUCTION.....	4
V. CRITERION I - HIGH POTENTIAL FOR ABUSE.....	5
Older DPX Death Studies.....	7
Recent DPX Death Studies.....	9
DPX Related Deaths.....	11
DPX Death Rates in U.S. Cities.....	11
VI. CRITERION 2 - ACCEPTED MEDICAL USE.....	15
VII. CRITERION 3 - DEPENDENCE (ADDICTION).....	16
VIII. ANALGESIC IMPOTENCE OF PROPOXYPHENE.....	20
IX. LEGAL ANALYSIS.....	23