

16592 COMPETITIVE PROBLEMS IN THE DRUG INDUSTRY

In light of the foregoing evidence of psychic and physical dependence and tolerance, the Administrator of the DEA found that "Abuse of DPX may lead to limited physical dependence or psychological dependence relative to the drugs or other substances in Schedule III."⁹¹ If this is true, the dependence produced by drugs and other substances in Schedule III, and a fortiori by those in Schedule II, should be considerably more severe. Yet it is not clear that certain drugs in Schedule II produce any greater degree of physical or psychologic dependence than DPX. Of amphetamines, for example, a widely-used medical textbook states that, "Physical dependence manifested as withdrawal signs is difficult to establish...The development of tolerance is also not easy to prove."⁹² Goodman and Gilman, an authoritative pharmacology text states:

For a long time it was believed that, except for drug craving, prolonged sleep, general fatigue, lassitude, and depression, there were no withdrawal symptoms from amphetamine-like drugs and, therefore, no physical dependence...It is still considered true that abrupt discontinuation of sympathomimetic amines does not cause major, grossly observable, physiological disruptions that would necessitate the gradual withdrawal of the drug. But the prolonged sleep, lassitude, fatigue, and depression, that follow discontinuation of these drugs are difficult to attribute merely to the preceding loss of sleep and weight...Most observers now recognize the existence of a withdrawal syndrome following discontinuation of amphetamine-like drugs. Its role in perpetuating drug use or relapse is not clear.⁹³ (emphasis added)

The relation between this withdrawal syndrome, characterized by fatigue and hunger, and amphetamine use has not even been firmly established. Yet amphetamines have been included in Schedule II, despite the lack of evidence of severe physical dependence.

DPX is far more widely abused than the amphetamines and, when abused it produces a comparable degree of psychological dependence and a greater degree of physical dependence. Thus DPX represents an even stronger case for inclusion in Schedule II.
