Only 67 reported quantitative results for propoxyphene with a range of 0.7-13.0 mcg/ml for a serum containing 5 mcg/ml and 13 reported a range of 0.3-3.0 mcg/ml of nor-propoxyphene for a serum containing 2 mcg/ml.

The specimen which contained about five times the lethal concentration was identified by about only 44 percent of the laboratories and quantitated by about 25 percent with a very wide range of results.

This could serve as an evaluation of the state-of-the-art of analysis for the drug in 1978.

We infer that many cases are missed because of generalized inade-

quacy of the laboratories.

In 1971 when the patent on propoxyphene hydrochloride expired, propoxyphene napsylate was introduced. It was hoped that its lower solubility would prevent poisoning by overdoses, unfortunately we have seen no evidence of this.

In 1978 in North Carolina where 31 deaths were attributed to proproxyphene, the trade names were given in the histories on 17 reports.

Thirteen had the trade names of one manufacturer; eight were for a propoxyphene hydrochloride product and six were for a propoxyphene napsylate product; one case had both names.

Hopefully propoxyphene napsylate would not be absorbed as rapidly and could prevent a large overdose from hitting the patient at one

time.

Unfortunately, we have seen no evidence of this, and it is hearsay, but it is all we have to go on when the patient is dead.

We cannot talk to him.

Here we are talking of not only a sole manufacturer or distributor for propoxyphene. There are quite a number, 17 or more, I do not know how many there are.

Our attention was attracted to the drug in 1972 when we applied a specific method of analysis developed in our laboratory to specimens

submitted from a number of unexplained deaths.

We were not the only ones to have specific methods of analysis at

that time.

If an adequate method of analysis for the drug had existed, it is interesting to speculate whether overdose deaths would have been detected and if they had, would the use of the drug have been dis-

If propoxyphene were not legally available, it is our opinion that there would be no incentive to prepare the compound or to traffic in

this drug for the illicit market.

We have been asked to comment on DAWN death data. I have been critical in the past, and I continue to be critical of the data as far as deaths are concerned, and I can comment only on the material made available to us.

We do not buy the service. Occasionally I see the material printed in the literature, and occasionally some has been supplied to me.

My criticism centers around what appears to be a great deal of the

data that is generated on "mentions" of drugs.

In our experience drugs mentioned by emergency room personnel or by medical examiners which we assume have been mentioned by the patient or others may be entirely different from those found by toxicological analysis.