

on the year, in descending order of medical examiner mentions and twenty-first in emergency room mentions. Examining the "mentions per new prescription" estimate for propoxyphene in relation to the figure for heroin/morphine^{*/} yields the conclusion that propoxyphene is about 2 percent as likely as heroin to produce a medical examiner mention.

Perhaps a word is in order about the use of prescription statistics as a proxy for affected population. We have used only new prescriptions in estimating, even though the average course of propoxyphene therapy involves 1.8 prescriptions, on the assumption that a refill, by definition, still subjects the same individual to risk. Since some of the drugs with which we compare propoxyphene do not qualify for refills or, if qualified, have low refill rates this assumption puts our case at an analytical disadvantage, but we feel it is important to be conservative in these analyses.

Trends in Propoxyphene Abuse

Propoxyphene abuse is declining. Our analysis of the DAWN medical examiner reports is presented in Exhibit C, attached (Blue Book, Tab D, Figure 2). The data plotted in Exhibit C were derived from our independent analysis of the

^{*/} Blue Book, Tab D, Tables 1 through 4, pages 19-22.