

the modern forensic toxicology scene it presented as a mixed drug, combination phenomenon.

The report also described the potential importance of propoxyphene-metabolite toxicity and noted the need for improved laboratory methods to detect and quantitate the drug.

Since this report other papers have been published which corroborate the findings, and corollary data have been developed through medical examiner reports to the Drug Abuse Warning Network system—DAWN.

An uncritical analysis of DAWN data would indicate that the occurrence of propoxyphene in sudden, unexplained death cases has continued unabated in the last 2 years. In order to inspect the validity of this assumption I undertook a short followup study, with particular reference to those sites which matched DAWN reporting areas and those at which particular case reports were announced.

The appended table shows some of the results and clearly indicates that since 1975 there has been a small but consistent decrease in the number of propoxyphene-associated drug death cases each year. This is an important trend.

Further, it is clear that suicides continue to predominate in this population and that propoxyphene occurs most often in multiple drug deaths in which the particular toxicological significance of propoxyphene and its metabolites is not usually defined.

If the human toxicology of propoxyphene is to be truly described then it is imperative that its role in each case be evaluated, and only reported for statistical purposes in those cases in which it is toxicologically significant. Any other practice will inevitably lead to erroneously inflated case reports and provide a misleading basis for possible public health regulation and drug control. A summary of the findings of this most recent study are attached for your information.

[The summary referred to follows:]