

just on quick inspection. I think that the firms have a desire to improve their advertising. They believe that we are going to enforce the law and the regulations that were put out under the law. And this has been an important factor.

The agency did not, from 1963 until 1966, take many actions on drug advertising.

Senator JAVITS. Well, now, with reference to the efforts at self-regulation, have you had any meetings of the whole industry where you laid down the law?

Dr. GODDARD. We have had meetings on self-regulation with representatives of the PMA, a committee that was appointed by their organization to discuss this. We have had meetings with individual companies. I have spoken to the entire membership of the PMA, as well as the Drug and Allied Products Guild and expressed my concern on this subject. We had a meeting of the advertising firms in New York that was attended by over 700 individuals last fall. We met in Chicago. I personally spoke before the midwest advertising group and people from the west and east coast were also in attendance. The ballroom was filled at that hotel. I think that the industry has had ample opportunity to learn from us what our position is.

Senator JAVITS. Under those circumstances, I request that you submit for the record your plan, including personnel and cost, that you feel would be required in order to really perform the duties vested in you by the law in respect of this matter.

Dr. GODDARD. I would be happy to do so.

(The information referred to, subsequently received, follows:)

STATEMENT OF THE FOOD AND DRUG ADMINISTRATION REGARDING THE PLAN FOR IMPLEMENTING MEDICAL ADVERTISING SECTIONS OF THE 1962 AMENDMENTS

The Division of Medical Advertising currently has a staff of eight full-time professional employees. It includes one Medical Officer, the Division Director; four PHS Scientific Associates, two physicians and two pharmacists assigned to FDA by PHS; two Food and Drug Officers; and one advertising analyst. The cost in fiscal year 1967 for this program, including the salaries and expenses of the professionals together with benefits and clerical support, was approximately \$125,000.

The following is a list of some of the activities of the Division of Medical Advertising in fiscal year 1967:

Citations and hearings-----	7
Seizures -----	3
(Lincocin, Lasix, Indoklon)	
Prosecutions filed-----	3
Letters to firms regarding corrections, advisory opinions, etc-----	70
Meetings with firms on advertising matters-----	75
PDR and supplement monographs reviewed in fiscal year 1967-----	170
PDR and supplement monographs reviewed in fiscal year 1966-----	36
Participation by division personnel in public meetings, seminars, etc., on medical advertising-----	4
Drugs subject of "Dear Doctor" remedial letters issued by the drug sponsors at request of FDA-----	14

To accomplish the desired program in fiscal year 1969 would require a total staff of 13 physicians and 10 other professional health personnel. The cost of such a program, including clerical support, benefits and miscellaneous expenses, would require a funding of approximately \$418,000.

In addition, it should be noted that the Division of Medical Advertising regularly uses as consultants Medical Officers of other areas of the Bureau of Medicine, especially those Medical Officers whose evaluations contribute to the approval of the NDA for the drug being advertised.