Senator Nelson. And if it turns out that it is not a penicillinase-resistance staph infection, it is your position that they ought to switch to penicillin G or some other, is that correct?

Dr. MINCHEW. Yes.

Senator Nelson. Do you think in your labeling, in your approved promotional ads, that this is made sufficiently clear?

Dr. MINCHEW. We believe so. Senator Nelson. Please go ahead.

Dr. MINCHEW. 3. The promotional letter was silent both as to the need for culture and sensitivity testing, and to the need to switch therapy if a penicillin G-sensitive organism is later found to be the causative agent. We regarded these omissions as particularly misleading because it acted to encourage unapproved use of Dynapen as an "everyday" penicillin.

Mr. Chairman, the initial Dynapen letter sent to physicians was not a long letter but, in our opinion, it was misleading almost in its

entirety.

The initial ad campaign in Medical World News—exhibit E—and the Medical Tribune carried the same misleading promotional impact as the promotional letter in several respects.

(The exhibit follows:)