

Statistical data is offered to prove the superiority of this drug over its established competitors. Animal data are used to support the claim that the mechanism of its action has been established.

But the claims of superiority and that it acts on the human satiety center of the hypothalamus are not scientifically established.

It is generally assumed that the 1962 Amendment did not control "relative efficacy", but ads which make claims of that kind are subject to critical review and proof that the Company's claims of superior effectiveness are well founded.

This ad appeared about the time of the Peritrate seizure. We are pleased to note improvements in later presentations.

Advertising prescription drugs should be a very special operation—wholly unlike advertising the 1967 model automobiles or the tars and nicotine of cigarettes. It should be based on the scientific data that allowed the drug to enter the market—you need look and can look no further than the official brochure for the allowable claims and the required warnings. As tempted as you may be by a new piece of investigative work that may be whispered to you to mount a new campaign to capture an entire market, you must remember that the approved claims are the limits beyond which promotion cannot go.

And in promoting newly developed and approved drugs, claims of greater safety and comparatively greater effectiveness can be made only on proven data—and then only with complete awareness that the limited experience with the drug accumulated during its investigational clinical practice; that clinical experience must be followed very closely and that ad campaigns will have to change as rapidly as clinical experience may require.

Please remember the thoughts that prescription drug advertising can go no further than the scientific support which sustains its approval for marketing; that you have an obligation in developing ad copy to tell the whole truth—good and bad; and that the entire advertising message must be designed around these basic ideas.

If the advertising copy for the "big eight" is typical of what is going on, Madison Avenue's new disease of "Behavioral Drift" is out of hand. Perhaps it can be cured by the placebo of talk, but more likely some stronger medicine will be necessary.