

all advertising should be factual, not misleading, and should not confuse or seek to influence the physician about the actual efficacy or indications of a drug in a way not consistent with objective research and clinical trials. Means to objectively evaluate these criteria are needed by the FDA and regulatory powers should be given to them so as to control misleading promotional activity.

4. Who should have the responsibility for determining the precise nature and extent of such limitations and for their enforcement?

The Food and Drug Administration as directed by Congress. Professional organizations, the drug industry, pharmacologists, etc., should have their professional advice available on specific cases for the FDA, who should be responsible for evaluation and enforcement. One great weakness in the present system is that the FDA does not have the facilities and personnel available for evaluation, and must depend upon the drug industry. This should be changed by legislation and increased appropriations.

5. Would such further limitations on the right of a drug manufacturer to engage in promotional activity result in a significant reduction in health care costs, and if so, how much of a reduction?

This is a difficult question to answer. It is now clear that a great deal of money goes for promotion and advertising, and limitations theoretically could reduce this and divert savings to the consumer through decreased costs. However, the greater questions of quality control, generic equivalency, competition to develop superior pharmaceuticals, the differences in price after retail mark-up, and the educational value of detail men to physicians make this a question that I, in good faith, cannot answer with a simplistic statement. The development of an objective drug compendium, available to all physicians, with wholesale prices included will do a great deal more to save the consumer money than arbitrary limitations on the amount of advertising dollars a company can spend.

I hope this is a satisfactory response to your question. Thank you again for the opportunity for us to let our feelings on this very important issue be known. With best regards, I am,

Very sincerely yours,

EDWARD D. MARTIN,
National President.