Such misuse and abuse of scientific information to mislead and deceive health practitioners makes it evident that it is necessary for some independent group to evaluate, assess, and compare such bioavailability data and information rather than leaving this to the companies involved which obviously have a significant vested interest. The American Pharmaceutical Association -- on its own initiative and with no outside funding -- has established a "Bioavailability Project" for the specific purpose of making such independent reviews and communicating such assessments to the profession of pharmacy.

In the event that the "Federal Compendium" -- which you and other colleagues in the Congress have proposed and which the Food and Drug Administration is currently considering -- materializes, I would anticipate that this compendium would also include valid information concerning drug bioavailability.

Moreover, if all such bioavailability testing were to be administratively centralized under the auspices of a single government agency -- such as the facility you have previously proposed, a National Drug Testing Center -- such self-serving company biases would be eliminated automatically from the design of the pertinent studies.

I trust these comments will be helpful, and I am prepared to supplement them should you desire any further comments relative to specific aspects of the Abbott memoranda.

Sincerely,

Edward G. Feldmann

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Enclosure