

January 15, 2007

To Members of the Anesthetic and Life Support Drugs Advisory Committee:

On July 26, 2006, as a mother who lost her son to a single dose of OxyContin, I had the honor (and tragic sadness) of testifying at the Congressional Hearing "Prescription Drug Abuse: What is Being Done to Address This New Drug Epidemic?"

As you may be aware new statistics from the 2006 Monitoring the Future Survey from the University of Michigan indicate that while past year **OxyContin** abuse was down among 12th grade students - from 5.5% in 2005 to 4.3% in 2006 - the rate nearly doubled among 8th graders between 2002 and 2006 - from 1.3% to 2.6%. **Vicodin** continues to be abused at unacceptably high levels - 9.7% for 12th graders, 7.0% for 10th graders, and 3.0% for 8th graders.

This is not good news and is just one of many indications that efforts to diminish the prescription drug abuse problem, particularly that of opioids, are failing.

In the 2 ½ years since the death of my son there still are no long term studies that show the safety or efficacy of long term opioid therapy yet physicians continue to prescribe them for chronic pain, frequently without regard to the origin of the pain (nociceptive or neuropathic).

A very recent, January 16, 2007 article in the Annals of Internal Medicine, "Systemic Review: Opioid Treatment for Chronic Back Pain: Prevalence, Efficacy and Association with Addiction" strongly suggests that opioids do not work better than placebo for long term relief and that significant risks exist with the use of opioids.

A less recent, January/February 2002 article in APS Bulletin Volume 12, Number 1, "Chronic Opioid Therapy: Another Reappraisal" also seriously questions the benefits of opioid use in chronic nonterminal conditions.

I have made numerous previous requests for the Anesthetic and Life Support Drugs Advisory Committee to meet to examine prescription opiate use and to review FDA Citizen Petition 2005P-0076, which my husband and I submitted in February 2005. These requests have gone unheeded but the problems, the deaths, the addiction continue, unabated.

*Once again I respectfully request that the FDA Anesthetic and Life Support Advisory Committee commit to the tentatively scheduled March 29, 2007 meeting to address the issues of:*

- (1) The accelerating and tragic prescription opiate abuse epidemic in the United States in general
- (2) A re-examination of the role of opioids in treating chronic non-malignant pain;
- (3) An examination of the efficacy and safety of long-acting opioids for long-term therapy
- (4) All issues raised in Citizen Petition 2005P-0076

Thank you for your time and consideration of this request.  
Barbara Van Rooyan