



June 18, 2001

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The Fargo-Moorhead
Advertising Federation
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Dockets Management Branch
(HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Docket No. 01N-0078

Dear Sirs:

The Advertising Federation of Fargo-Moorhead (F-M Ad Fed) appreciates the opportunity to comment on the Food and Drug Administration's proposed survey of patients and physicians on direct-to-consumer (DTC) advertising about prescription medications.

F-M Ad Fed is an organization of advertising, marketing and communication professionals dedicated to providing educational, leadership and networking opportunities for its members within the organization and community.

F-M Ad Fed believes that the FDA surveys should be designed to increase our understanding of the important contribution that DTC advertising makes to informing and empowering consumers about their health and to helping ensure successful public health outcomes. To do so, we believe that the FDA survey sample should be large enough to provide statistically significant results both among and within patient subgroups and among and within physician specialty groups. In addition, the survey instrument should examine a wide range of behavior and outcomes associated with DTC advertising.

F-M Ad Fed understands that the proposed surveys are one component of the FDA's review of DTC advertising. Many surveys have provided valuable insight into how DTC advertising affects patient behavior. The FDA has the opportunity to extend that knowledge, to take it to the next level, and to give us a better understanding of how DTC advertising influences action taken and decisions made by patients and physicians.

Previous surveys highlight the important role that DTC advertising plays in informing patients about medical conditions they may have and possible treatments, as well as in fostering communication with health care professionals and helping patients comply with treatment regimens. Prevention magazine, for example, reports, "DTC advertising may be playing an important role in promoting public health. In fact, the advertising may be just as effective at promoting public health as it is in marketing prescription drugs." (source: Prevention magazine 2000-2001 survey, page 5).

The FDA's 1999 survey found that DTC advertising of prescription drugs provided important information to consumers about their health care.

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Forty-seven percent of respondents who had visited a doctor in the three months prior to the survey strongly or somewhat agreed that DTC advertising helped them to make better decisions about their health. Sixty-two percent strongly or somewhat agreed that DTC advertising helped them to have better discussions with their doctor about their healthy. (source: FDA 1999 survey questions 41 and 41).

Recently, the National Academy of Sciences released a report on the dramatic changes in the quality of life for America's elderly. Kenneth G. Manton, a co-author of the study, said "the likelihood of the elderly being vigorous is higher now than ever before." (source: Washington Post, "Elder Americans Seem to Thrive," Tuesday, May 8, 2001). According to the Washington Post, Manton attributed this to the fact that "older Americans are now better educated, take better care of themselves, and are taking advantage of new medical knowledge about how to stay healthy." (source: Washington Post, "Elder Americans Seem to Thrive," Tuesday, May 8, 2001). The availability of health information from a wide variety of sources, including mass media, has played an important role in ensuring that elderly consumers are more informed about medical conditions and the treatments available to them. DTC advertising also provides patients with a language to initiate dialogue about their condition.

The FDA also proposed to conduct a survey of physicians. F-M Ad Fed thinks that this is an appropriate compliment to the patient survey. However, we again urge the FDA to ensure that the survey sample of physicians is large enough to draw statistically significant conclusions about behavior and attitudes among and within appropriate physician specialty groups.

In conclusion, F-M Ad Fed supports the FDA's decision to conduct surveys of patient and physician behavior and attitudes associated with DTC advertising of prescription drugs. Advertising by its very nature is designed to influence attitudes and behavior of targeted audiences. This clearly is the case for DTC advertising of prescription medications. DTC advertising of prescription drugs is designed to educate and motivate different audiences. The proposed FDA surveys can add to the growing body of knowledge about the benefits of DTC advertising of prescription medications if it reflects the dynamic environment.

Sincerely,

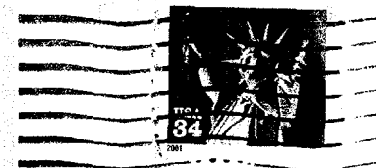


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