



nabp

National Association of Boards of Pharmacy

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October 20, 2003

Thomas W. Abrams
Division of Drug Marketing, Advertising, and Communications
US Food and Drug Administration
HFD-42
Parklawn Building, Room 17B17
5600 Fishers Lane
Rockville, MD 20857

2570 '03 DEC -5 P2:11

RE: Direct-to-Consumer Advertising Targeted to Children and Adolescents

Dear Mr. Abrams:

The National Association of Boards of Pharmacy (NABP) is the professional organization that represents state boards of pharmacy in all regions of the United States, the Virgin Islands, Puerto Rico, eight provinces of Canada, three states in Australia, New Zealand, and South Africa. NABP was established in 1904 to develop uniform standards and procedures for pharmaceutical licensure and for the transfer of licensure. Over the past 99 years, NABP has been repeatedly called upon to develop programs and services to assist the state boards in their charge to protect the public health, safety, and welfare. It is in this capacity that we write to you to express our concern regarding direct-to-consumer advertising of prescription medications and its impact on children and adolescents.

For children and adolescents who lack the maturity and experience to objectively evaluate claims made in an advertisement for prescription drugs, such advertisements may give the impression that the products being promoted are harmless, when, in fact, their prescription status, by definition, demonstrates that is not the case. We would ask that the FDA review its policies on direct-to-consumer advertising and consider adopting guidelines for advertisers that would more effectively consider the target audience and limit the advertising of prescription medications to adults.

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If you have any questions or would like to discuss this matter further, please contact me at 847/698-2612 or my e-mail at ceo@nabp.net. Thank you for your consideration of this manner.

Cordially,

NATIONAL ASSOCIATION OF
BOARDS OF PHARMACY

A handwritten signature in black ink, appearing to read 'Carmen Catizone', with a large, sweeping flourish above the name.

Carmen Catizone, MS, RPh, DPh
Executive Director/Secretary

CAC:klo

cc: Capt. Elizabeth E. Hiner, Food and Drug Administration
NABP Executive Committee