



March 06, 2008

Steve Phurrough, MD, MPA
Centers for Medicare & Medicaid Services
Coverage and Analysis Group
Mailstop C1-09-06
7500 Security Boulevard
Baltimore, MD 21244

Re: CMS recognition of DrugPoints Compendium

Dear Dr. Phurrough:

ImClone Systems Incorporated (ImClone Systems) requests, as part of the open comment period, that the Center for Medicare & Medicaid Services (CMS) add the DrugPoints Compendium published by Thomson Micromedex to the list of compendia specified in Section 1861(t)(2)(B)(ii)(I) of the Social Security Act. This section lists certain compendia recognized by CMS and allows CMS to name additional compendia for recognition.

ImClone Systems

ImClone Systems Incorporated is a biopharmaceutical company committed to advancing oncology care by developing and commercializing a portfolio of targeted biologic treatments designed to address the medical needs of patients with a variety of cancers. The Company's research and development programs include growth factor blockers and angiogenesis inhibitors. The company's first approved product, Eribitux[®] (cetuximab), has been approved by the Food and Drug Administration for the treatment of irinotecan refractory or intolerant EGFR-expressing metastatic colorectal cancer and for locally advanced, recurrent or metastatic head and neck cancer.

DrugPoints Compendium

As outlined in the Federal Register of November 27, 2007, the DrugPoints Compendium appears to satisfy the CMS definition of a compendium. DrugPoints is an extensive catalogue of pharmacologics, over 1400 entries, which are indexed by the specific drug or biologic. Each drug or biologic is summarized including pharmacology, pharmacokinetics, uses, dosing, schedule, administration and toxicities.

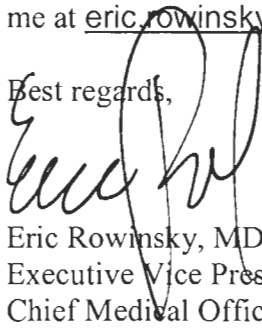
The DrugPoints review process is publicly published and transparent. Reviews incorporate established criteria for weighing clinical evidence and making recommendations, which are rated per a published and clearly defined rating system. DrugPoints also updates their database on a weekly basis to assure information remains current.

Conclusion

The DrugPoints Compendium appears to satisfy CMS' criteria for a compendium. Its extensive reporting, regular updating, transparent review and rating process, and clear reporting of recommendations assures ease of use and timely access for patients to quality cancer drug and biologic care. Given this, ImClone Systems requests that CMS add the DrugPoints Compendium to the list of compendia specified in Section 1861(t)(2)(B)(ii)(I) of the Social Security Act.

If you have any questions regarding ImClone System's request, please feel free to contact me at eric.rowinsky@imclone.com or 908-203-6912.

Best regards,



Eric Rowinsky, MD
Executive Vice President
Chief Medical Officer