

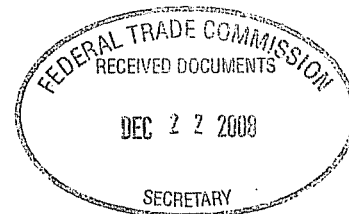
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December 19, 2008

Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex F)  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580



**Re: Emerging Health Care Competition and Consumer Issues – Comment, Project No. P083901**

Dear Federal Trade Commission:

Eli Lilly and Company (“Lilly”) welcomes the opportunity to comment on matters discussed at the Federal Trade Commission’s November 21, 2008, workshop, Competition Issues Involving Follow-On Biologic Drugs. Lilly is one of the largest producers of recombinant DNA derived biologic products in the world. Lilly, in conjunction with our collaboration partners at Genentech, developed and launched the world’s first recombinantly-produced human insulin product, Humulin®, in 1982. Since then, Lilly has gone on to develop and launch numerous products manufactured via recombinant DNA technology, including Humatrope® (human growth hormone), Xigris® (activated human protein C), Forteo® (an analog of human parathyroid hormone) and Humalog®, the world’s first insulin analog molecule. Lilly currently has nearly twenty (20) biological agents in its pipeline, including molecules for the treatment of diabetes, obesity, oncology, atherosclerosis and osteoporosis.

Lilly’s comments focus on the expected nature of competition among innovator and follow-on products, the impact of a follow-on pathway on biologic product development and the critical role of exclusivity in shaping development and marketing of these products. These comments are organized to correspond to certain questions provided by the FTC in advance of the workshop.

**Lilly’s Response to Designated Questions from the FTC**

4. *How would the prospect of competition from follow-on biologic drugs influence research and development for new biologic drugs, improvements to existing biologic drugs, and the timing and rollout of new and/or improved biologic drugs? Does*









