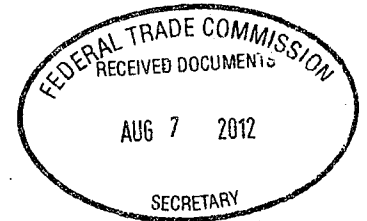


Paso Robles Veterinary Medical Clinic

ORIGINAL



August 1, 2012

Federal Trade Commission/Office of the Secretary
600 Pennsylvania Avenue NW
Room H-113 (Annex X)
Washington, D.C. 20580

RE: Pet Medications Workshop, Project No. P12-1201

To Whom It May Concern:

As a practicing veterinarian I am opposed to H.R. 1406 for multiple reasons.

The veterinarian is best suited to determining what medication and dosing are appropriate for a patient. The vast majority of pharmacists while being well trained in the human pharmaceutical field are not adequately trained in veterinary pharmacy differences. I cannot recall how many times that I have received calls from pharmacists questioning doses that I have prescribed for a patient that are accurate but do not coincide with human dosing. Unless we are going to require that pharmacists become certified in "Veterinary Pharmacy" as well as "Human Pharmacy" mistakes are going to be made.

This will take away from the care that we can provide to our patients so that we can clarify prescribing information. While it is desirable to have Licensed Veterinary technicians not all practices have the luxury and benefit of being able to hire an LVT/RVT/CVT/LT. Therefore it will take the Doctors time to field these concerns.

There are multiple unscrupulous online pharmacies that have little if any oversight. Many online pharmacies do not even have a pharmacist on the premises; non-licensed personnel just put pills in the mail. They are not above procuring their medications from counterfeit sources or selling short dated or even outdated medications. I had a client just last week that asked if he could use medication that was purchased online without a prescription that was labeled as a commercially available medication but was clearly not the trade drug packaging. Additionally the dosing of the tablet that was listed was not commercially available. Clearly this legislation would be removing or limiting protections of the health of the patient let alone consumer protections.

Currently we do write prescriptions for patients when the client asks for one. Consumers are already very internet educated and not need veterinarians to inform them of online pharmacies. Income from a veterinary practice is derived from multiple avenues. One significant avenue is from dispensing of pharmaceuticals. If this revenue stream is lost cost of veterinary services will rise to offset this loss of income. This will in turn hurt the population of animals as well as the public by decreasing the amount of veterinary visits that the general public can afford. This will, in turn add to the burden on already overpopulated Animal Shelters as more animals are abandoned. Again this will increase the need for further government spending and responsibility of an already overstressed system.

As a small business owner I employ 10 people (not including my veterinarian wife and myself). The impact of this legislation will require me to cut staffing and lay off employees. During these troubling economic times it will be difficult if not impossible for these laid off staff members to find jobs in their chosen field as other veterinary clinics will be in the same circumstances.

In conclusion, I strongly recommend that H.R. 1406 be removed from further consideration. This bill will have too many negative consequences on animals, people and the government.

Sincerely,



James J. Wiest, MS, DVM