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Federal Trade Commission
Office of the Secretary
Room H-113 (Annex X)
600 Pennsylvania Ave., NW
Washington, DC 20580

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

To Whom It May Concern:

In the past decade questions and discussions relative to the sale and distribution of pet medications have occurred on various levels and in various forums. As the providers of effective responsible health care for our country's pet population veterinarians can and should play an integral role in pet medications decisions. This includes not only an accurate assessment of a pet's health to ascertain the need for medication and appropriate dosage, but also aspects of pet owner education with respect to the medication as well as follow up care as may be necessary.

We understand and appreciate that the American Veterinary Medical Association has provided thorough commentary on the issues and specific questions the FTC will consider at its October 2, 2012 Pet Medications Workshop. The AVMA provides effective and comprehensive informational resources as well as veterinary perspectives on the issues. Duplication of effort from authoritative, knowledgeable sources, as with the appropriate dispensing of pet medications, is not necessary and therefore our commentary to this workshop is brief.

Historically pet owners have had a convenient, authoritative, medically sound resource for medications for their pet in their community's veterinarians. Veterinarians offer pet owners numerous advantages that provide value, information and convenience to owners and equally important, medically sound judgments and medications to their pets. Indeed a number of pharmaceutical manufacturers have encouraged pet owners

to obtain their medications through veterinarians recognizing that doing so helps insure that the medications will be sold in the appropriate dosage for the appropriate condition with proper disclosure of possible side effects as well as effective follow up care in the event of an adverse reaction. The veterinary owner relationship also enhances the chance for proper counseling and education to the pet owner in administering the medication, along with proper storage and human health safety considerations.

In recent years on-line distributors of pet medications and retail pharmacies have entered the pet medication marketplace. Pet owners are obviously free to evaluate all of the options available to them and make choices as to their preferred provider. Both the AVMA and OVMA encourage veterinarians to provide prescriptions in lieu of dispensing whenever the client requests that option and based on a variety of sources we believe the significant majority of veterinarians do provide a prescription when requested and when they can do so legally in meeting the parameters of a valid veterinary client patient relationship.

Those who seek to interject unnecessary and mandatory parameters into veterinary – owner communications would appear to be more concerned with inappropriately utilizing government regulation as a means of marketing their company than with a genuine interest in the health of the animal and truly informed owner choice. Today's pet owner clearly has options and while it may at times be difficult for some to understand and ascertain that identifying a pet medication provider has a variety of variables of which price is only one, the consumer has the flexibility and information to make their own decisions.

Any attempt to unnecessarily complicate the pet medication marketplace with federal legislation would hopefully recognize that pet medication decisions are first and foremost a medical decision. One in which the role of the veterinarian in all phases of diagnosis and prescribing is not only important, it is essential for the well being of the pet as well as the satisfaction and confidence of the owner.

While today's pet medication marketplace has its challenges, a focus on enforcement of existing state and federal pharmacy laws along with continually evolving pet owner education with respect to the issues are appropriate avenues to be explored. New federal legislation or regulation that would complicate and hinder veterinary and client communication should be dismissed as ill advised and clearly unnecessary.

Respectfully,

Jack Advent, CAE
Executive Director