



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

VIA Electronic Submission

September 21, 2012

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

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

To Whom It May Concern:

On behalf of the National Association of Chain Drug Stores (NACDS) and its membership, thank you for the opportunity to provide comments in connection to the Federal Trade Commission (FTC) workshop on pet medications issues.

NACDS represents traditional drug stores, supermarkets, and mass merchants with pharmacies – from regional chains with four stores to national companies. Chains operate more than 41,000 pharmacies and employ more than 3.8 million employees, including 132,000 pharmacists. They fill over 2.7 billion prescriptions annually, which is more than 72 percent of the annual prescriptions filled in the United States.

Chain pharmacies are dedicated to providing convenient, affordable access to prescription drugs, pharmacy services, and many other items, including pet products, to their customers. In fact, working in partnership with veterinarians, retail pharmacists have historically dispensed human medications for use in pets. Chain pharmacies also provide over the counter (OTC) pet medications and other pet-related items. These are established business practices.

At the request of customers, many chain pharmacies have begun to dispense, or are in the process of exploring options to provide prescription pet medications to their customers. We see this as a natural expansion of our current role with customers that are pet owners.

Pharmacists are the most highly trained healthcare professionals in medication management. They receive a minimum of six years and in many cases eight years of college, with four years enrolled in a College of Pharmacy where they study medication uses, dosing, side effects, interactions and patient care. Building on this expertise, NACDS members have developed additional policies and programs to ensure pet medications are dispensed in a safe manner. Initiatives by chain pharmacies include accredited continuing education lessons on common pet

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medications, common conditions, counseling, dosing in pets, and triage – the recognition of symptoms that require immediate intervention by a veterinarian.

Retail pharmacy is a highly competitive industry, operating on razor thin profit margins which average two percent. Consumers benefit from this competition through convenient access, lower prices, and outstanding customer service. Allowing greater competition in the dispensing of prescription pet medications would provide these same advantages to pet owners.

NACDS believes the choice of where to obtain pet medications – both OTC and prescription – should be made by the pet owner. For this reason, we support H.R. 1406, the Fairness to Pet Owners Act, introduced by Representative Jim Matheson. This legislation would provide pet owners the ability to receive a copy of veterinary prescriptions along with a written disclosure that the prescription may be filled through the prescriber, or through another pharmacy determined by the pet owner.

Competition and choice has resulted in improved access and lower prices for prescriptions and OTC products for human use, and we strongly believe the same result would occur if greater competition was permitted in prescription and OTC pet medications.

Thank you for the opportunity to share our views. We look forward to working with you on policies that benefit our customers.

Sincerely,


Julie Helm Khani
Vice President, Public Policy