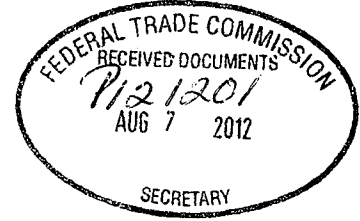


ORIGINAL



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

To whom it may concern,

There has been a lot of talk in recent months about consumer fairness in regards to the sale of veterinary products. It is well known that American consumers spend a substantial amount of money each year on important medications and products for their pets. There is an obvious concern about the cost of these products. Questions have been raised, "Is this fair to the consumer?" As a veterinarian I have to ask, "Is it fair to the pet?" And my answer is yes if you are purchasing your products from a trusted veterinarian. I want to share a few of my own personal experiences regarding this topic in hopes that it will shed some light on this important issue.

Over the past few years I have seen an increase in prescription requests from big box pharmacies and clients ordering medications from 1-800 numbers. I have many concerns about this. Most importantly is my concern for the well-being of the pet. An owner's attempt at saving a few extra dollars may inadvertently be placing the beloved pet at risk. Quite frankly, ordering products outside of a veterinarian's office means the consumer has no idea where these products are coming from or how they are being handled. By ordering these medications a consumer runs the risk of receiving expired drugs or drugs that have been shipped from a country that has fewer regulations on pharmaceutical safety. This could mean severe consequences for the beloved pet these products are intended for.

Heartworm and flea preventatives are a good example of how purchasing products outside of a trusted veterinary clinic can mean negative consequences for the consumer. By ordering a heartworm or flea medication from a 1-800 number, consumers run the risk of receiving a product that is expired, dosed for the wrong size pet or even the wrong species, or shipped from a country that has fewer regulations on pharmaceutical safety. There is no guarantee that accompanies these products. On the other hand, purchasing them from the veterinarian directly ensures that they will be handled properly, that the appropriate dose will be sent home for the appropriate species and size of the animal, and that the client will be counseled on proper usage and potential interactions. Furthermore, most drug companies will go as far as to guarantee the efficacy of their *product if sold by the veterinarian* and will compensate for heartworm treatment or flea extermination should product failure become an issue.

Another classic example which I have seen happen multiple times over the years, is the failure of human pharmacists to be properly trained in veterinary pharmacology. I have had many clients over the years that requested a written prescription for a medication to take to a local pharmacy for filling. My priority is always the care of the pet and convenience of the client. Morally and ethically I am obligated to oblige this request and

do so gladly. However, there have been many instances in which a pharmacy has refused to fill the prescription as written because the medication was "not safe at the prescribed dose". This is an inconvenience to the client and creates distrust. Because the pharmacist, understandably, does not have a degree in veterinary medicine and therefore does not have a working knowledge of veterinary pharmacology, the assumption was made that the prescribed dose was not safe because it was not safe for a *human* when in fact the dosing was not only safe but indicated in the case of the pet it was prescribed for. Furthermore, there is no counseling available for the concerned pet owner because the pharmacy tech or pharmacist does not know about proper routes of administration for pet medications, or possible drug reactions, etc. This is, again, because they are not trained in veterinary medicine. Often times clients leave with a medication dosed lower than that prescribed and without any counseling (or worse: misinformation!). The client is in return left with frustration and a pet who did not receive the proper medications it needed. Sadly, the majority of the time the veterinarian receives the blame for these failures.

Lastly, veterinarians are small business owners. We have devoted our lives and our careers to ensuring the care and safety of pets is number one. No one but the veterinarian can provide better treatment options. No one will educate clients on care and use of medications and product safety better than the veterinarian. No one else can provide a guarantee on certain products such as flea and heartworm medications. And lastly, no one else will spend more time talking to the client, worrying about the pet and working to ensure the needs of both are met. As small business owners we depend on the support of the people in our community to help keep the business alive. Competition from big box pharmacies only serve to drive prices up and drive clients to there phones for potentially unsafe, albeit sometimes cheaper, products. I implore you to strongly consider these statements as you discuss this very important issue.

Sincerely,

Laura Boarman, DVM
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