

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

August, 30,2012

Addressing the FTC :

Concerning Veterinary Pet Medications Workshop/ Project No. P12-1201 from the standpoint of a veterinary practice owner I request that you consider the following points:

Veterinarians Hospitals have always been complete and full service businesses. The knowledge about animals is unique to veterinarians. Therefore, they should be the permanent persons in charge for prescribing medications, dispensing them and giving information on possible side effects for individual patients. A human pharmacist does not have this training and veterinarians should not be expected to train pharmacists. They could go through an accreditation process for this but a veterinarian should not be expected to do it "as good will" consider we went to Veterinary College for this extensive training. . The value for the client of the in-hospital pharmacy assures them and us that the pet/patient will receive the medication that day (at the time needed) and that it will be accurately dispensed. I have often cringed when the pharmacist calls to question my dosage on medications (eg. levothyroxine in dogs) and have become irate when the prescription was CHANGED by the pharmacist. Yes, the pharmacist THINKS it is an error and doesn't even call. Or, if the Pet Express on-line type pharmacists makes an error I never now about it until refill time . They make a lot of mistakes!!!

We *do* offer the clients the option for their prescriptions elsewhere -- locally so we can help the economy. Our organizations, AVMA and the OVMA, encourage veterinarians to meet a client's request to have prescriptions filled at an off-site pharmacy – something that most practices honor. I don't believe our staff should spend time with paperwork, confirmation and waiver of liabilities etc. Why? What are the criteria showing these changes are needed? Is this all pushed by Walmart and Pet Express type pharmacies?? I think Walmart has shown us they are out to make a buck –high volume, low quality. And that is what we would expect with their Veterinary Pharmacies as well.

The topic is of extreme importance to the Veterinary Community. If we are told how to dispense medications, what comes next—how to spay a cat?? No of course, we went to school for that, too.

Urgently and Respectfully,
Becky E. Marks, DVM, owner
Timberland Animal Clinic
18110 SE Division St
Portland, OR, 97236
503.665.1194