



September 11, 2011

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

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

Dear Sir or Madam:

Thank you for the opportunity to comment on the matter of pet medications. I write as a veterinarian, a former companion animal practitioner, the former CEO of a companion animal veterinary association, and as a private consultant to the animal health industry.

The availability and distribution of pet medications has evolved significantly in the past 5-10 years and, from a pet owner/consumer price and choice standpoint, has never been better. As noted in the Federal Register Notice of July 9, 2012 the emergence of significant numbers of retailers has resulted in increased competition and – generally – benefits considered to be pro-consumer.

Also as noted, due to requirements in many states, veterinarians may not refuse to provide a prescription. Even more importantly, due to veterinarians' awareness of customer service expectations, there are few, if any, barriers to pet owners wishing to obtain pet medications from sources other than their veterinarian. Substantial advertising by retailers has greatly increased consumer awareness of the availability of pet medications from many sources other than the veterinarian.

Although I am not aware of specific data, it certainly appears that market pressures have, at least in many instances, resulted in lower prices of medications from all sources, including the veterinarian. Further, in order to address the convenience issues, many veterinary practices now offer availability of online ordering and home delivery.

That being the case, there is no need for **requiring** veterinarians to provide a written prescription, whether requested by the pet owner or not, as would result from the Federal legislation in House Bill 1406. Mandating the provision of a written prescription even when not requested would result in time consuming administrative burdens, the cost of which would ultimately be passed on to pet owners.

While I do not believe that matters related to pet medications need to be regulated any more than they currently are, I do believe that the Federal Trade Commission, as our nation's primary consumer protection agency, needs to help protect pet owners in two other important ways:

1. While instances of incorrect prescription filling by licensed pharmacists fortunately appear to be relatively uncommon, errors have occurred in which pet health may have been compromised or even harmed. Much more training and education relative to animal physiology and pharmacology by pharmacists is needed. The FTC could ensure that this additional training and education is required of pharmacists wishing to dispense pet medications.
2. Further, many retailers dispense pet medications that are obtained directly and/or indirectly from licensed manufacturers and that have been properly stored and handled. However, a simple web search reveals numerous sources that appear to be overseas and/or suspect with respect to sourcing and handling products, some of which may be counterfeit or adulterated. Consumer education with regard to safe sources of pet medications would benefit both pet owners and, more importantly, their pets.

Thank you for the opportunity to comment.

Sincerely,

John W. Albers, DVM
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