

Federal Trade Commission

**Initiative:** Pet Med. Project No. 12-1201

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Dear Sir or Madam



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I am writing regarding proposed changes in the way that prescription medications are dispensed to pet owners. Our 7 doctor practice has been operating since 1963. We have seen the practice of companion animal medicine evolve tremendously over that 50 year span. It used to be that we were 20 years behind human medicine in diagnostics and treatment options we could offer. Now we too have many board certified specialties and hundreds of medications available so that our patients can receive the state-of-the-art care that our clients demand.

Currently, California veterinarians are required to provide a written prescription on request so that clients can fill their prescription outside of a veterinary practice. Some of our clients do make this request but most do not. This is a good balance for us and our clients. Due to the ubiquity of their television advertising it would be hard to find anyone in America who was not aware of 1-800-PET-MEDS even if they do not own a pet. Pet product aisles are prominent in big box retailers where some of the OTC products we sell are also sold. This represents opportunity for competition in the fast growing marketplace for veterinary product sales. I would consider it an undue burden on our doctors and clients to require that every prescription be given to the client in written form to fill elsewhere.

In addition consumers benefit from the competition between manufacturers that currently exists in the pet care industry. Merial, Novartis, Bayer, Pfizer, Elanco and others all compete with each other with monthly parasite control products, each one better than the last. They have eliminated the substantial misery and health care costs associated with flea allergic dermatitis. Each new product requires extensive training to understand how it works and what the risks are. For example, the class of insecticide known as permethrins are commonly used in flea and tick products for dogs but they are fatally toxic to cats. By limiting the distribution to veterinarians, manufacturers can be more confident that their products will be used in a manner that is safe and effective.

Consumers benefit from a strong doctor-client-patient relationship. This is true when an animal is put on a new treatment and the instructions are tricky or the animal does not cooperate. It is typical to spend time with the client administering the first dose together so that we can be sure the medications are being used properly and successfully at home. It is even more important on those rare occasions when there is an adverse event. For example, a small number of dogs will react to common non-steroidal-anti-inflammatory drugs with a severe-life-threatening-liver toxicity. When the product is sold through a third party all the client can expect is a refund of the purchase price. When the product is sold through normal distribution channels it is typical for the manufacturer to pick up the cost of veterinary care, as a courtesy. This can save the client thousands of dollars in expensive treatments and can save those animals lives. Not everyone can afford to provide the hospitalized treatments that are required otherwise. We have several of these cases every year and our clients are spared the considerable treatment expense that can arise.

The expansion of the online pharmacy and big-box retailers has brought limited price reductions for consumers. I believe the price points work in the market now because of the value of the products is boosted by the client-patient-veterinarian relationship that is required. Forcing pharmacies into the equation would be highly disruptive to an industry already under considerable financial strain and would only serve to damage that important relationship without any added benefit to consumers.

Sincerely,

Carol B. Schumacher, RVT

cc Congresswoman Anna Eshoo