

January 31, 2007
PhRMA Office of Accountability
950 F Street, NW, Suite 300
Washington, DC 20004

To whom it may concern:

It has come to my attention that Takeda Pharmaceuticals North America, Inc. is running “reminder” ROZEREM ads on prime-time network TV, despite apparently being a signatory to PhRMA’s DTC Guiding Principles.

As you know, principle #10 states:

"DTC television advertising that identifies a product by name should clearly state the health conditions for which the medicine is approved and the major risks associated with the medicine being advertised."

The “reminder” ads that Takeda is currently running do NOT mention the medical condition ROZEREM is approved to treat and therefore are in violation of principle #10.

Takeda has taken the dangerous precedent of redefining what a reminder is in order to circumvent adherence to the above principle: “We don’t believe that they are reminder ads,” said Matt Kuhn, spokesman for Takeda Pharmaceuticals North America. “Rather, they are bookends to the full ad which...opens the commercial break.”

I do not believe this argument has merit. In fact, it makes a mockery of the PhRMA guidelines and worsens the industry’s reputation as evidenced by several news stories and blog posts devoted to this incident.

The following is the date, approximate time, and TV network where I have personally seen the ROZEREM reminder ad noted in the attached PhRMA Office of Accountability submission form:

- Sunday, January 28, 2007; approx. 7:20 PM Eastern Time; CBS; show: 60 Minutes (Channel 2 in Philadelphia)

The PhRMA web site states: "If your comment relates to an aspect of a signatory company’s advertising that is covered by the Principles, the Office of Accountability will forward your comment to the relevant company for consideration."

I hope, however, that PhRMA will consider a more proactive approach considering that many critics have complained that the DTC Guiding Principles have “no teeth.” Allowing Takeda to continue to run these reminder ads and/or redefine what a reminder ad is just adds credence to that claim.

As the publisher and editor of *Pharma marketing News* and contributor to Pharma Marketing Blog (www.pharmamarketingblog.com), which was cited by the Wall Street Journal as a Health Care Blog “Insiders Read to Stay Current,” I eagerly look forward to PhRMA’s response to this matter.

Sincerely,

John Mack
Publisher, Pharma Marketing News

Cc: Mark Booth, Takeda Pharmaceuticals North America, Inc.; Matt Kuhn, Takeda Pharmaceuticals North America, Inc.



Form for Submission of a Comment to the PhRMA Office of Accountability

Please provide your name:

John Mack, publisher, Pharma Marketing News

Please provide your address:

PO Box 760
Newtown, PA 18940

Please provide information in at least one of these categories to identify the advertisement on which you are commenting:

• Name of medicine advertised:

Rozerem

• Name of company that makes the medicine:

Takeda Pharmaceuticals

• Brief description of advertisement: "Abe Lincoln" plays tabletop field goal with a beaver. Reminder ad.

Please provide your comments about the advertisement (including, if possible, the Principle(s) at issue): see www.pharmamarketingblog.com/blogpost312.htm

Ad mentions Rozerem without mentioning indication -- in violation of PhRMA DTC principle #10

Mail your comment to:
PhRMA Office of Accountability
950 F Street, NW, Suite 300
Washington, DC 20004

or

Fax your comment to:
202-775-0258