

**Federal Healthcare Partnership Comments:  
PMPRB Notice and Comment;  
Draft Revised Excessive Prices Guidelines  
(March 2009 Version)**

**Background:**

The Patented Medicine Prices Review Board (PMPRB) has been undertaking consultations on possible changes to their excessive price guidelines beginning in 2005.

**Comments Provided:**

In general, FHP is appreciative of the PMPRB's diligent work to consider the views of stakeholders and to integrate them into the most recent version of the "Excessive Price Guidelines" (March 2008).

Specifically, upon review, it is clear that the PMPRB has carefully considered the views of all stakeholders. It is recognized that a number of items that FHP has previously commented on have been considered in the latest edition of the guidelines and have realized viable resolutions. For example, we support the incorporation of the "any market" price review process and the specific language designed to clarify this process. Likewise, similar measures, which may enhance the transparency of pharmaceutical pricing data are welcomed.

We encourage the PMPRB to continue their efforts to consider the views of stakeholders. The FHP will continue to monitor the Guideline review process to ensure that views of the FHP and its member organizations are reflected in the final product.

*April 22, 2009*