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Wayne J. Quigley
Président

October 6, 2008

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Dr. Brien G. Benoit
Chairperson
Patented Medicine Price Review Board
Box L40
Standard life Centre
333 Laurier Avenue West, Suite 1400
Ottawa, ON K1P 1C1

Doc. 004722

Dr. Benoit:

The purpose of this letter is to respond to your invitation to submit our input regarding the PMPRB's Notice and Comment package on the Draft Revised Excessive Price Guidelines released on August 20, 2008.

I would like to start by stating that despite significant feedback submitted on pricing regulations and proposals from the PMPRB via its association, very little if any seemed to have been considered. We believe having made through our association positive comments and suggestions to improve the price assessment of patented drugs in Canada without compromising the principles of excessive pricing.

Actually, with a high rate of compliance from the part of our industry, we do not understand the motivation of the PMPRB wanting to expand its mandate. The current proposals are likely to impact negatively on market dynamics, while unduly increasing, in our opinion, the burden level resulting from additional complicated and sometime vague regulations that might leave room to interpretation.

You will understand that maintaining and growing business in such an unpredictable environment is not conducive of increasing investment levels over time.

I do not want to dwell upon the problems of each and every one component of the proposals. I think that your organization has been made aware of these along the consultation process. I ask the Board of the PMPRB to differ implementing the proposals until the final outcome of the judicial review, and from adopting changes to the guidelines since further review and analysis are required.

Sincerely,

Wayne Quigley