

Responses to the Questions for the Record letter by Mr. Tim Davis

**The Honorable John D. Dingell**

1. Do you agree that a traceability system would help to better secure our drug supply chain from counterfeits, theft, and intentional adulteration? If no, please explain why.

**Yes.**

2. Do you agree that a traceability system would help to identify and detect illegitimate pharmaceuticals? If no, please explain why.

**Yes.**

3. Do you agree that a traceability system would help to ensure the safety of pharmaceuticals for patients and consumers? If no, please explain why.

**Yes.**

4. Do you agree that a traceability system would improve the efficiency and effectiveness of recalls or returns? If no, please explain why.

**Yes**

5. Do you agree that a federal traceability system should be based on uniform, national standards? If no, please explain why.

**Yes.**

6. Do you agree that a federal traceability system should include participation from everyone in the supply chain? Please explain why.

**Yes.**

7. Do you agree that a federal traceability system should take a phased-in approach? If no, please explain why.

**Yes, I very strongly agree that a federal traceability system should take a phased-in approach.**

8. Do you agree that a federal traceability system with a phased-in approach should include clear requirements and a clear timeframe for a second phase? If no, please explain why.

**Yes.**

9. Do you believe that a unit level traceability system is feasible at this time for all members of your industry? Please explain why.

**No, I do not believe that a unit level traceability system is feasible at this time for most of our members. While the overall hardware and software components exist in**

**distinctly separate resources, there has not been an aggregated solution specific to the practice of pharmacy comprised of these distinct components found in the marketplace today. To compile the required resources, adjust workflow, integrate solutions, and account for all pharmacy level exceptions to optimal processing scenarios will take time and experience. A requirement of unit level traceability at this point in time will compromise patient care and safety by creating turmoil and confusion through the use on an incomplete solution. Finally, while we hope that the technology develops quickly enough so it can exist in the market long enough to be inexpensive for our small business owners – it is not there yet so that remains an unknown.**

10. Do you agree that the goal of any federal traceability system should be unit level tracing?  
If no, please explain why.

**Yes, I agree that the ultimate goal of any federal traceability system should be unit level tracing.**

11. Do you believe that it is imperative that traceability legislation be passed this year? If no, please explain why.

**Yes.**