

PRESIDENT J.B. Van Hollen Wisconsin Attorney General

PRESIDENT-ELECT Jim Hood Mississippi Attorney General

VICE PRESIDENT Marty Jackley South Dakota Attorney General

> IMMEDIATE PAST PRESIDENT Douglas Gansler Maryland Attorney General

> > EXECUTIVE DIRECTOR

December 16, 2013

Margaret A. Hamburg, M.D. Commissioner U.S. Food and Drug Administration 10903 New Hampshire Avenue Silver Spring, MD 20993-0002

Dear Dr. Hamburg:

State Attorneys General have pursued a holistic approach to end our nation's prescription-drug abuse epidemic. This approach includes evidence-based prevention, robust law-enforcement operations targeting diverted pharmaceuticals, and the implementation of state-operated prescription-drug monitoring programs. This balanced attack, combined with the efforts of the Drug Enforcement Administration, has undoubtedly saved many lives by preventing prescription-drug overdoses.

The State Attorneys General want to thank you for your recent efforts to ensure branded opioid drugs have abuse-deterrent formulations. But we must go further. Ensuring that generic opioids, like their branded counterparts, have abuse-deterrent properties is a commonsense improvement that provides yet another important tool in the fight against our nation's prescription drug epidemic.

Accordingly, the undersigned State Attorneys General respectfully request that the FDA provide clear and fair regulatory standards for the incorporation of abuse-deterrent technologies into generic opioids. The FDA has been an excellent partner in fighting prescription drug abuse, and we look forward to continuing to work with you in ending this epidemic.

Sincerely,

Pamela Jo Bondi Florida Attorney General

Jack Conway Kentucky Attorney General

5. Olma

Samuel S. Olens Georgia Attorney General

Janet Mills Maine Attorney General

2030 M Street, NW Eighth Floor Washington, DC 20036 Phone: (202) 326-6000 http://www.naag.org/

Chi Llo

Chris Koster Missouri Attorney General

 $\bigcirc$ 

Tom Horne Arizona Attorney General

W. Juthers

John Suthers Colorado Attorney General

Lenny Rapadas Guam Attorney General

Lawrence Wasden Idaho Attorney General

77. loe Greg Zoeller

Greg Zoeller Indiana Attorney General

James "Buddy" Caldwell Louisiana Attorney General

Marton Coahley

Martha Coakley I Massachusetts Attorney General

asch

Lori Swanson Minnesota Attorney General

wher Stran

Luther Strange Alabama Attorney General

Dustin McDaniel Arkansas Attorney General

T

Joseph R. "Beau" Biden III Delaware Attorney General

David Louie Hawaii Attorney General

Lisa Madigan Illinois Attorney General

Sm

Tom Miller Iowa Attorney General

Aus -

Douglas F. Gansler Maryland Attorney General

Bill Schuette Michigan Attorney General

Im that

Jim/Hood Mississippi Attorney General

Tim Fox Montana Attorney General

atterine / Toty

Catherine Cortez Masto Nevada Attorney General

John Hoffman Acting New Jersey Attorney General

Roy Cooper North Carolina Attorney General

muchael De

Mike DeWine Ohio Attorney General

and Allen

Kathleen Kane Pennsylvania Attorney General

lan Wilson

Alan Wilson South Carolina

eg blacker Greg Abbott

Texas Attorney General

William H. Sorrell Vermont Attorney General

(runin on, /Jon Bruning

Nebraska Attorney General

Joseph Foster New Hampshire Attorney General

Gary King

New Mexico Attorney General

Wayne Stenehjem North Dakota Attorney General

Eller 7. Kounte

Ellen Rosenblum Oregon Attorney General

clut. Nilmar

Peter Kilmartin Rhode Island Attorney General

veller

Marty J. Jackley South Dakota Attorney General

Már

Brian Tarbet Acting Utah Attorney General

W. +-

Robert W. Ferguson V Washington Attorney General

PATRICK Momsey

Patrick Morrisey West Virginia Attorney General

Sto, Van Hollon

J.B. Van Hollen Wisconsin Attorney General