

December 7, 2000



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U.S. Department of Transportation Dockets
Docket No. FAA-2000-7119 - 394
400 Seventh Street, SW.
Room Plaza 401
Washington, DC 20590

Dear Sir or Madam:

On September 18, 2000, The Food Allergy Network (FAN) submitted comments to the Federal Aviation Administration (FAA) of the U.S. Department of Transportation regarding FAA Docket 2000-7119 Federal Register [Volume 65, Number 101] dealing with Emergency Medical Equipment.

These comments were in response to a notice of proposed rulemaking (NPRM) issued by the FAA on May 24, 2000 proposing, "that air carrier operators carry automated external defibrillators on large, passenger-carrying aircraft and also augment currently required emergency medical kits." Unfortunately the NPRM for the enhanced medical kit did not recommend the inclusion of an epinephrine autoinjector. Therefore, FAN submitted comments requesting that the new enhanced medical kit include epinephrine in an autoinjector form.

FAN would like to bring to your attention recent developments that make it even more important that an epinephrine autoinjector be required as part of the enhanced airline medical kit.

Approximately 90% of food allergic patients are given prescriptions for epinephrine in an autoinjector form called EpiPen[®]. Less than 10% of patients are given prescriptions for ampule and syringe devices, with most of those sales going to AnaKit[®] and AnaGuard[®] products.

Due to a decision to discontinue production of the critical component by a key supplier (Wyeth-Ayerst Laboratories manufacturers of Tubex[™] epinephrine), AnaKit[®] and AnaGuard[®] products will soon be withdrawn from the market by their distributor, Hollister-Stear Laboratories. That means that virtually all personal prescriptions of epinephrine will soon be for EpiPen[®].

In the event of a severe allergic reaction on an airplane requiring self-administration of epinephrine, only a very small percentage of patients will know how to use the ampule and syringe currently included in the emergency kit. Therefore we recommend that the FAA include an epinephrine autoinjector in the enhanced medical kit.

Please to not hesitate to contact me if you have questions or need more information.

Sincerely,

Anne Muñoz Furlong
President and Founder