

PhRMA Guiding Principles

Practical Implications for DTC



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Advertising and Communications Industry Supports Guidelines

- Have seen benefits of DTC, to marketer *and* patient – consumer
- Understand MD/patient dialogue
- Comfortable with explicit regulation
- Believe in consumer empowerment

Guidelines Build on Current Behavior

- Most TV is sent to FDA for comment prior to production
- Fair balance has evolved to be more balanced
- MD communications preceding patient/consumer

Impact on Timing

- Submission *pre-at-time-of-usage* can add 1-2 months to the process
- DDMAC does not currently claim need to review un-branded TV
- May increase trend of launching with disease awareness, following with brand
- Advertisers may push DDMAC submission earlier in process

Impact on Creative

- Some executional change prior to guidelines release (Ortho, AZ)
- Potential for over reaction
- Still “Know it when I see it” POV from DDMAC
- Marketers are guessing at appropriate adherence
- No more reminder advertising

The Path Forward

- DTC will stay under microscope
- Industry needs to look at the complete communications continuum
- The Empowered Consumer is here to stay
- Responsibility must be our mantra