



2227 Idlewood Road, Suite 6, Tucker, GA 30084
Phone: 800-504-3189 or 770-934-2910 Fax: 770-934-2911
Email: ngf@gaucherdisease.org
www.gaucherdisease.org

January 9, 2012

Chairman Jon Leibowitz
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

Dear Chairman Leibowitz:

The National Gaucher Foundation (NGF) writes you today to express our concerns with the proposed merger of Express Scripts, Inc. and Medco Health Solutions. We are very supportive of the Commission's decision to review the proposed merger and we ask that the Commission carefully examine the implications of the merger on access to prescription drugs in the specialty pharmacy market.

The NGF is a non-profit organization dedicated to funding research into the cause of Gaucher Disease, as well as treatments and an eventual cure. Additionally, the NGF grants financial assistance, promotes education and awareness, supports legislation and provides vital programs to people with Gaucher Disease as well as their families and caregivers.

The proposed merger would combine two of three largest pharmacy benefit managers and the two largest specialty pharmacies – Express Scripts' CuraScript Pharmacy and Medco's Accredo. NGF is concerned that should ExpressScripts and Medco merge, the new combined firm will have increased incentive and ability to restrict patient access to the specialty pharmacy care that many patients of Gaucher Disease depend on. Additionally, we are concerned the merger will increase the ability of the joint firm to enter into exclusive distribution agreements with pharmacy manufacturers, which have previously raised the cost of drugs and further restricted consumer access to life-saving drugs.

A leading treatment for Gaucher patients is intravenous Enzyme Replacement Therapy (ERT). Due to the complex and time-sensitive nature of this therapy, for many patients the most effective treatment is administered by infusion center staff educated to ensure these specific treatments are given correctly. It is of utmost importance, therefore, that these patients maintain the ability to receive these treatments at a qualified infusion center of their choosing. NGF asks the Commission, therefore, to critically examine the proposed deal's impact on patient choice for treatment options.

Gaucher Disease is an autosomal recessive disease in which both parents must carry the mutation in order to pass the disease on to their children. About 1 in 20,000 people in the US are born with Gaucher Disease and 1 in 200 people are carriers. Due to the small number of persons with Gaucher Disease in the US, it is easy to ignore the impact this merger will have on our patients. It is important, therefore,

Dr. Robin A. Ely
Medical Director
robinbmd@aol.com
Ph: 770-934-2910
Fax: 770-934-2911

Brian E. Berman
President
ngf@gaucherdisease.org
Ph: 770-934-2910
Fax: 770-934-2911

Rhonda P. Buyers
CEO/Executive Director
rhonda@gaucherdisease.org
Ph: 770-934-2910
Fax: 770-934-2911

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that the Federal Trade Commission speaks for our patients. With the proper treatment, it is possible that many persons with Gaucher Disease can live full lives. It is vital, however, that these patients receive treatments properly and on time.

NGF wants to ensure that patients have continued choice as to which medications they utilize and where they receive their treatment. We ask that the Commission carefully review these concerns with respect to the proposed merger of Express Scripts and Medco.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rhonda P. Buyers". The signature is fluid and cursive, with a prominent initial "R".

Rhonda P. Buyers, CEO
Executive Director