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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,

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