



*Advancing Quality Healthcare
Through Over-the-Counter Medicines
and Nutritional Supplements*

CONSUMER HEALTHCARE PRODUCTS ASSOCIATION

June 23, 2004

U.S. Department of Transportation
Dockets Management Facility
Room PL-401
400 Seventh Street, SW
Washington, DC 20590

Re: Docket No. FHWA-2004-17321, Specific Service and General Service Signing
for 24-Hour Pharmacies

Dear Sir/Madam:

The Consumer Healthcare Products Association (CHPA) supports the Federal Highway Administration's interim final rule allowing pharmacy signs on federal-aid highways.

CHPA, founded in 1881, represents manufacturers and distributors of nonprescription, or over-the-counter medicines and dietary supplements. The association works to promote the increasingly vital role of OTC medicines and dietary supplements in America's healthcare system through science, education, and advocacy.

We believe this pharmacy sign initiative positively responds to important demographic trends in the country in a manner that will make highway travel safer for the traveling public. The FHWA is to be commended for carrying out this rulemaking consistent with the law and with the existing regulations that properly govern highway signage. The criteria established for eligible pharmacies -- that they be open 24-hours-a-day, have a licensed pharmacist on duty, and be located relatively near to an interchange -- are appropriate and serve the best interests of those travelers who are in need of pharmacy services while on the road.

With more and more highway travel, we see no reason to expect this trend to do anything but continue. At the same time, the population of travelers, like the population as a whole, is growing older. This, coupled with an on-going need for prompt access to prescription drugs, over-the-counter medications and pharmacy services of all kinds, argues strongly in favor of enhancing access to pharmacies for those who travel the nation's highways.

Our experience is that healthcare products sold by pharmacies enhance the everyday lives of millions of Americans and that there is an increasing expectation that such products will be readily available for purchase at all hours of the day and in all regions of the country, to satisfy

consumers' demands both near home and away from home. Having pharmacy signs on highways serves to meet these demands.

Further, in times of potential public health emergencies that may require sudden evacuations or some degree of public health anxiety, it will be an added benefit that travelers have proper notice and direction to nearby pharmacies where health-related products will be available.

For all of these reasons, we commend the FHWA for taking this action, and we would join in encouraging all states to take advantage of this new guidance to help create a nationwide uniformity of such signs for the benefit of the traveling public.

Sincerely,

/s/

David C. Spangler
Vice President – International &
Assistant General Counsel