

September 21, 2011

First DataBank Pricing Confirmation Process

We believe that it is our responsibility as a publisher of pharmaceutical data to verify the drug pricing information reported to us and ensure its currency. To fulfill that commitment, we have implemented a process of soliciting biannual pricing confirmations from the labelers whose drugs are active products on our database. This process is a supplement to – and subset of – our broader, ongoing drug product pricing data collection and maintenance.

In accordance with this policy, First DataBank notifies all drug companies that twice a year we will forward them a Pricing Update Document that requires their review, completion and signature. We follow this notification with subsequent communications to ensure that labelers understand our need for pricing corroboration and the requirement that they provide it.

In the event that we receive no response to our Pricing Update Document, we make repeated efforts by telephone and email to notify the labeler representatives who have been identified to First DataBank as authorized contacts. If this also proves unsuccessful, we will make a final effort by a certified letter to the Chief Executive Office of the nonresponding labeler that a continued failure to provide the pricing confirmation will result in our identifying the company's products as obsolete on the database. If there is still no response by the labeler, that identification will occur.

We trust that manufacturers will understand the importance of current data to our customers and the corresponding consequences of a failure to provide the requested pricing verifications.