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June 21st, 2021

Rebecca Kelly Slaughter, Acting Chair
Multilateral Pharmaceutical Merger Task Force
Federal Trade Commission
Office of the Secretary, Room H-113 (Annex X)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: *Pharmaceutical Task Force, Project No. P212900 Comments*

[Comments submitted electronically at www.regulations.gov]

Dear Acting Chairwoman Slaughter,

Thank you for the opportunity to submit comments to the Federal Trade Commission (FTC) to inform the Multilateral Pharmaceutical Merger Task Force's review of how to approach and analyze the effects of pharmaceutical mergers.

The Global Healthy Living Foundation (GHLF) is a 20-year-old 501(c)(3) non-profit patient-centered organization representing people with chronic diseases. We work to improve the quality of life for people living with chronic disease through research, education, support, and advocating for improved access to care. We thank the FTC for your commitment to improving our healthcare delivery system to ensure that patients can benefit from a fair and competitive pharmaceutical and medical device market.

To improve pharmaceutical M&A reviews, patient impact should be prioritized. How mergers impact patients' ability to access the treatment deemed best for them in consultation with their healthcare provider, and the reduction of financial burden in accessing that treatment needs to be a paramount concern moving forward. Ultimately it is patients who are paying for and using these products; it is patients who are benefitting from these products.

It is critical that when thinking about mergers in this space the FTC address the basic question: will this merger make access to medications easier or harder for patients? That is the how to measure the ultimate impact on our society. With proper medications, many chronically ill patients can live healthy lives and be productive members of society. Mergers have the potential to combine scientific thinking to find new breakthroughs, but also the potential to increase the costs of medications and to make them inaccessible.

Too often, patients are left out of the conversations that most impact their healthcare choices and access to treatment. Having patients as a part of these conversations impacts both cost and access that future M&As may have.

We appreciate that the FTC must balance creating conversations will provide the lived experience necessary to evaluate the potential market conditions that encourage innovation and reward success, while also maintaining a competitive market and protecting consumers from monopolistic drug pricing.

We appreciate the opportunity to give input into this important review.

Sincerely,

A handwritten signature in black ink that reads "Steven Newmark". The signature is fluid and cursive, with the first name "Steven" and last name "Newmark" clearly legible.

Steven Newmark
Director of Policy and General Counsel
Global Healthy Living Foundation

