

Meredyth Andrus
Health Care Division, Bureau of Competition
Federal Trade Commission
Washington, DC 20580

Re: Responding to FTC/DOJ Drug Pricing Listening Sessions

The [PBM Accountability Project](#) brings together stakeholders across healthcare, labor, business, pharmacy and consumer patient advocacy to help ensure that patients and employers are not overpaying for essential medications. We appreciate the opportunity to submit comments following the joint FTC/DOJ listening sessions, *Lowering Americans' Drug Prices Through Competition*.

We applaud the FTC's ongoing efforts to address the ways in which pharmacy benefit managers (PBMs) have used their market domination and unchecked power over drug pricing and access to drive up costs for consumers, employers and taxpayers. The recent FTC lawsuit against the three largest PBMs for using their market power unfairly to manipulate and ultimately inflate insulin prices is a significant step. As your interim reports have shown, the six largest PBMs now control nearly [95%](#) of all U.S. prescriptions filled in the United States, making it possible for PBMs to charge significant markups of [up to 1000%](#) for cancer, HIV and other critical specialty generic drugs. What's more, vertically integrated PBMs routinely use their market control to steer patients toward [higher-cost drugs](#) while blocking access to lower-cost alternatives with prior authorization and "fail-first" requirements.

Through all of these machinations, PBMs are padding their own profit margins at the expense of patients.

To meaningfully lower out-of-pocket drug costs, PBM reform must be a top priority. Federal policymakers can take concrete action by:

- Requiring PBM transparency
- Eliminating PBMs' perverse incentives that reward inflated drug costs.
- Separating PBM revenues from drug prices and, instead, have PBMs paid a fair, market-based flat fee for the services they provide.

We are sharing a new fact sheet, [PBMs: Profiting at the Expense of Patients, Pharmacies & Taxpayers](#), which details how these drug insurance middlemen manipulate the system to boost their own profits – hurting patients, small businesses and taxpayers alike.

The FTC's investigations have already exposed PBM misconduct. Now is the time to act. We urge you to work prudently and urgently with Congress and the Administration to implement meaningful PBM reform and deliver real relief to Americans.

We are happy to answer any questions and look forward to continued engagement on this critical issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark", written in a cursive style.

Mark Blum
Managing Director, PBM Accountability Project