



April 12, 2007

Dear Dr. Koller, Dr. Feinglass and Ms. Ciccanti:

The Medical Oncology Association of Southern California represents more than 350 oncologists in California. Since 1990 the mission of the Medical Oncology Association of Southern California, Inc. (MOASC) is to advance and protect the ability of cancer patients to obtain, and the ability of the oncologist to provide optimal cancer care.

Thank you for affording MOASC the opportunity to review and comment on the NCA on administration of Erythropoiesis Stimulating Agents for non-renal disease indications (CAG-00383N).

In general, the Association has responded in a positive fashion to the recommendations presented. The strongest concern is with regard to patients with myeloma and anemia of cancer. MOASC's recommendations are:

- 1) Allow the use in myeloma patients if they are anemic while on chemotherapy or after radiation, with target levels 12.
- 2) Allow the use in myeloma patients if patient is on treatment with drugs that are known causes of cytopenia, such as Revlimid.
- 3) ESA's are appropriate for the use in patients with anemia of chronic disease and should be expanded to include all acute and chronic infections, as well as, all inflammatory conditions.  
(reference: Cash, J.M.; Sears, D.A.; The American Journal of Medicine 1989: volume 87, pages 638-644. *Anemia of Chronic Disease: Spectrum of Associated Disease in a Series of Unselected Hospitalized Patients*).

Your consideration of these comments is greatly appreciated.

If you have any questions, please do not hesitate to contact the MOASC office at (909) 985-9061.

Sincerely,

*Robert A. Moss*

Robert A. Moss, M.D.  
President

Sincerely,

*Cary A. Present, M.D.*

Cary A. Present, M.D.  
Chairman of the Board