

## FDA Warning Letters Caused Dramatic Decline in Sponsored Link Exposures, According to comScore

## Pharmaceutical Manufacturers Reevaluate How to Reach Consumers during the Search Process

RESTON, Va., Oct 01, 2009 /PRNewswire-FirstCall via COMTEX News Network/ -- comScore, Inc. (Nasdaq: SCOR), a leader in measuring the digital world, today released the results of a study of changes in search engine marketing in the pharmaceutical industry as a result of the FDA warning letters distributed in March 2009. Using comScore data, the study found that sponsored link exposures to U.S. Internet users declined more than 50 percent immediately after the FDA warning letters were issued to pharmaceutical manufacturers concerning the exclusion of fair balance language in sponsored link advertising.

(Logo: http://www.newscom.com/cgi-bin/prnh/20080115/COMSCORELOGO)

On March 26, 2009, the Division of Drug Marketing, Advertising, and Communications (DDMAC) of the U.S. Food and Drug Administration (FDA) sent warning letters to 14 major pharmaceutical manufacturers identifying specific brands as being in violation of FDA fair balance guidelines. The letters stated that sponsored link advertisements for specific drugs were misleading due to the exclusion of risk information associated with the use of the drug.

At the urging of the warning letters, many pharmaceutical companies temporarily removed their sponsored link ads for these identified brands as well as many other brands not specifically mentioned in the letters. As a result, sponsored link exposures for pharmaceutical brands experienced a dramatic decline as manufacturers redesigned their strategies to ensure compliance with the letters.

## FDA Letters Cause an Immediate 59 Percent Drop in Sponsored Link Exposures

An analysis of exposure to branded URLs within comScore's data revealed that substantial declines occurred immediately following the letters being sent on March 26. Sponsored link exposures dropped 59 percent from 10.5 million during the week ending March 29 to 4.3 million during the week ending April 5. Declines in sponsored link exposures not only occurred in the weeks immediately following the letters, but continued over the next several months, plummeting 84 percent overall from March to June.

Total Sponsored Link Exposure for Major Pharmaceutical Manufacturers Average Link Exposures per Month Total U.S. Home/Work/University Location Source: comScore, Inc.

|                      | Ave    | erage Total 1 | Exposures | (000)  |
|----------------------|--------|---------------|-----------|--------|
|                      | Mar-09 | Apr-09        | May-09    | Jun-09 |
| Sponsored Link       |        |               |           |        |
| Exposure             | 11,861 | 3,244         | 2,895     | 1,924  |
|                      |        |               |           |        |
| Unbranded Link       |        |               |           |        |
| Exposure             | 1,582  | 1,419         | 1,337     | 1,028  |
|                      |        |               |           |        |
| Vanity Link Exposure | 3,545  | 3,038         | 3,568     | 3,170  |
|                      |        |               |           |        |

Vanity and unbranded link exposures also experienced a decline, on average, across brands during the same period, although these methods were not under scrutiny in the FDA letters. Unbranded sites, which give additional information on the condition and treatment but do not directly promote the brand drug, declined 35-percent March to June to slightly more than one million exposures. Vanity URLs, which make no mention of a specific brand while generically describing a health condition but then redirect to the brand or drug's website, declined 11 percent in June to 3.2 million average exposures versus March.

Although the use of vanity and unbranded URLs saw growth for certain individual brands after the letters, the overall decline in vanity and unbranded URL exposures demonstrates that searchers for information on a specific treatment or drug brand may

not find the health-related information they are searching for as readily as they did prior to the guidance.

"The FDA letters changed not only how pharmaceutical manufacturers are marketing online, but what consumers are being exposed to when they search for health information," said John Mangano, vice president of marketing solutions for comScore. "Independent of what is happening on the regulatory front, we see continued increases in consumers turning to the Internet to research health conditions, treatments and drugs. It is important that marketers and the FDA find a middle ground that meets the spirit of the FDA guidelines and is supportable in the various emerging online media."

## About comScore

comScore, Inc. (NASDAQ: SCOR) is a global leader in measuring the digital world and preferred source of digital marketing intelligence. For more information, please visit <u>www.comscore.com/companyinfo</u>.

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