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August 10, 2026

Karen Winkel, Rules Coordinator
Oregon Department of Consumer and Business Services
Division of Financial Regulation
350 Winter Street NE
Salem, OR 97309-0405
dfr.rules@dcbs.oregon.gov

Re: Prescription Drug Price Transparency Program Updates

Dear Ms. Winkel:

The Pharmaceutical Research and Manufacturers of America ("PhRMA") appreciates the opportunity to review and comment on the Oregon Department of Consumer and Business Services' ("Department's") Notice of Proposed Rulemaking regarding Prescription Drug Price Transparency ("DPT") program updates ("Proposed Rulemaking"), which were previously discussed at the Department's Rules Advisory Committee ("RAC") meetings on June 2, 2026 and June 25, 2026.[1] PhRMA represents the country's leading innovative biopharmaceutical research companies, which are focused on developing innovative medicines that transform lives and create a healthier world. Together, we are fighting for solutions to ensure patients can access and afford medicines that prevent, treat, and cure disease. PhRMA member companies have invested more than $850 billion in the search for new treatments and cures over the last decade, supporting nearly five million jobs in the United States.

PhRMA continues to have significant concerns regarding the rule changes contemplated in the Proposed Rulemaking.[2] PhRMA reiterates, and encourages the Department to consider, the comments and concerns raised in our June 12, 2026, and July 8, 2026, letters to the RAC.[3]

* * *

On behalf of PhRMA and our member companies, thank you for consideration of our comments. Please contact dmcgrew@phrma.org with any questions.

Sincerely,

Dharia McGrew, PhD
Senior Director, State Policy
Sacramento, CA

Alexandra Hussey
Senior Director, Law
Washington, DC

[1] Notice of Proposed Rulemaking (filed July 29, 2026), *available at* https://dfr.oregon.gov/help/committees-workgroups/Documents/RAC/dpt-price-increase-reports/20260625-dpt-rac-draft-rules.pdf.

[2] In filing this comment letter, PhRMA reserves all rights to legal arguments with respect to 2018 Or. Laws ch. 7 (H.B. 4005) (codified as amended at Or. Rev. Stat. § 646A.689) (the "DPT Statute") and the Department's implementation of the DPT Statute. PhRMA incorporates by reference all comments, concerns, and objections that it has previously raised, including with regard to proposed rules and draft versions of proposed rules, to the extent applicable. *See, e.g.*, Letter from PhRMA to Department (July 8, 2026); Letter from PhRMA to Department (June 12, 2026); Letter from PhRMA to Department (Feb. 21, 2025); Letter from PhRMA to Department (Dec. 11, 2024); Letter from PhRMA to Department (Nov. 6, 2024); Letter from PhRMA to Department (Oct. 3, 2024); Letter from PhRMA to Department (Sept. 9, 2024); Letter from PhRMA to the Department (Feb. 1, 2019); Letter from PhRMA to the (Nov. 29, 2018); Letter from PhRMA to the (Nov. 1, 2018); Letter from PhRMA to the Department (Oct. 15, 2018); Letter from PhRMA to the Department (Sept. 24, 2018); Letter from PhRMA to the Department (Aug. 27, 2018); Letter from PhRMA to the Department (Aug. 17, 2018).

[3] Letter from PhRMA to Department (July 8, 2026), *available at* https://dfr.oregon.gov/help/committees-workgroups/Documents/RAC/dpt-price-increase-reports/20260708-dharia-m-phrma-comment.pdf; Letter from PhRMA to Department (June 12, 2026), *available at* https://dfr.oregon.gov/help/committees-workgroups/Documents/RAC/dpt-price-increase-reports/20251225-dharia-m-comment.pdf.