

relationships between PBMs and pharmacies and also PBMs and pharmaceutical manufacturers, a matter of much public interest” in light of the fact that markets have changed since 2005.⁶

The Commission’s investigative and report-writing power pursuant to Section 6 of the Federal Trade Commission Act⁷ is a valuable tool in the agency’s policymaking toolbox. Section 6(b) studies and reports contribute greatly to the Commission’s successes in serving the public interest. Over the years, 6(b) studies have revealed the inner workings of complex markets or

months ago.¹⁸ Yet, to date, the Commission has taken no steps to enforce the PBM Orders. If the PBM Order recipients are engaging in dilatory tactics and are not complying, the Commission should turn to the courts and move to enforce the PBM Orders immediately. The role of PBMs in our healthcare markets is of immense public concern, and we should deploy resources to bring this 6(b) study to a conclusion.

I am disappoin