



April 25, 2008

Minnesota Board of Pharmacy
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RE: Reporting of Payments to Practitioners - AstraZeneca LP: January 1, 2007 through December 31, 2007

To Whom It May Concern:

Enclosed is a report of payments made for events, engagements and services provided in calendar year 2007 by AstraZeneca to practitioners in the state of Minnesota. AstraZeneca is providing information in the annual report based on its good faith efforts and interpretation of, and compliance with, the Minnesota statutes, sections 151.461 and 151.47(f). Although the Minnesota law states that the reports are "public data," please be advised that AstraZeneca considers the information in this report to be confidential commercial information. AstraZeneca does not publicly release this information or the documents that were used to generate this report. Further, public release of the information in this report, either individually or in aggregate, may harm AstraZeneca, giving AstraZeneca's competitors information that may give them a competitive advantage and undermining the company's relationship with contractors and consultants.

AstraZeneca occasionally makes payments to institutions and business entities, which, in turn, may make payments to Minnesota practitioners. For example, AstraZeneca has arrangements with universities and other business entities to conduct research or provide services under which payments may be made by the entity to Minnesota practitioners. The report shows only direct payments by AstraZeneca to practitioners. The company also makes grants to sponsors of independent education activities. In these cases, the independent education provider may make payment to a practitioner who serves in a faculty capacity. As the independent education providers act outside the control or influence of AstraZeneca, any payments by these providers to practitioners are not listed in this report.

AstraZeneca understands that section 151.47(f) of the Minnesota statutes requires pharmaceutical manufacturers to report payments to sponsors of education programs, compensation and reimbursement to healthcare practitioners who serve as faculty at educational or professional conferences, and compensation for professional or consulting services. Section 151.47(f) does not require the reporting of "gifts" to Minnesota practitioners as that term is defined in the related Minnesota statute section 151.461. As noted in the Board of Pharmacy's Frequently Asked Questions (dated February 2006), "[a] meal is not considered a gift if the practitioner is serving on the faculty at a professional educational conference or meeting or if the practitioner is providing to the manufacturer 'substantial professional or consulting services' as part of a genuine research project." AstraZeneca has therefore included reimbursed meal expenses for educators and consultants in the enclosed annual report.

Section 151.47 (f), requests that AstraZeneca lists payments corresponding to clauses (3) through (5) of section 151.461 paid to practitioners in Minnesota during the preceding calendar year. Section 151.46 (5) requests specific payments listed as "compensation for the substantial professional or consulting services of a practitioner in connection with a genuine research project". There are no payments reportable for section 151.461 (5).

Finally, it is important to note that the entire report has been assembled through a manual process of extracting and analyzing available data from multiple systems, and it is thus subject to the unavoidable imperfections arising from any manual process, as well as the limitations of AstraZeneca's existing data sets, including the potential that some of the data reported may reflect events or services scheduled in late 2007 but that may not have actually been paid yet due to internal delays in processing. Conversely, for similar internal processing reasons, compensation actually paid in 2007 for services rendered prior to 2007 may have been included in an earlier year's report instead of this one. We continue to strive to improve our systems and processes to increase the accuracy of the report.

If you have any questions regarding the information submitted, please contact Leonard Rybaltowski, Director of Marketing & Sales Assurance, at 302-885-3226.

Sincerely,



Mark Mallon
Vice President, Sales and Marketing Operations

Enclosure