



GE Healthcare

3000 N. Grandview Blvd.
Waukesha, WI 53188

June 4, 2010

Louis B Jacques, MD,
Director, Coverage and Analysis Group
Centers for Medicare & Medicaid
7500 Security Blvd, Mail Stop C1-09-06
Baltimore, MD 21244

Re: Public Comment on (CAG 00181R-3) (Proposed Decision Memorandum for Positron Emission Tomography (PET) for Initial Treatment Strategy in Solid Tumors and Myeloma)

Dear Director Jacques:

GE Healthcare (GEHC) appreciates this opportunity to comment on the Proposed Decision Memorandum CAG-00181R3, of the Centers for Medicare & Medicaid Services' (CMS), to eliminate the current absolute limit of permitting only one FDG-PET scan related to the initial treatment strategy for cancer patients based on existing published clinical evidence along with current medical practice.

GEHC, a \$17 billion unit of General Electric Company with headquarters in the United Kingdom, has expertise in medical imaging and information technologies, medical diagnostics, patient monitoring systems, performance improvement, drug discovery, and biopharmaceuticals manufacturing technologies. GEHC's broad range of products and services enables healthcare providers to offer patients' earlier and better diagnosis and treatment of cancer, heart disease, neurological diseases, and other conditions to improve the quality and length of life. Worldwide, GEHC employs more than 46,000 people committed to serving healthcare professionals and their patients in more than 100 countries.

GEHC fully supports the collaborative response submitted jointly by the Academy of Molecular Imaging (AMI), the American College of Radiology (ACR), the American Society for Therapeutic Radiology and Oncology (ASTRO), the American College of Nuclear Medicine, and the Society of Nuclear Medicine (SNM). Collectively, clinicians, academicians, researchers and nuclear medicine providers coordinated their feedback and we would like to acknowledge their efforts to unify responses from the various stakeholders for optimal oncology patient care.

CMS' decision to amend the current PET coverage policy for initial treatment planning is applauded by GEHC. We would, however ask that CMS encourage local contractors to develop policies that support the intent of this proposed decision memorandum to ensure

that beneficiaries with cancer will indeed be able to obtain additional PET scans for radiation treatment planning when clinically appropriate.

We appreciate the opportunity to comment on this proposed decision memorandum, and look forward to providing CMS with any additional information that would be of value in this regard.

Sincerely,

A handwritten signature in black ink that reads "Hugh Zettel". The signature is written in a cursive style with a large initial "H" and "Z".

Hugh Zettel
GE Healthcare, Strategic Reimbursement Executive