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4 1 1

Pls don't
miss place.

SB 911 - Joe Hill - talked
A.G. to lawyer in D.C.

local Medical Assoc. have
challenged

Stopped other Docs from
participating

Borough Health Dept
says need A.G. opinion
or pass bill

MEMORANDUM

LEGISLATIVE AFFAIRS AGENCY
STATE OF ALASKA

POUCH Y—STATE CAPITOL
JUNEAU, ALASKA 99811

TO: Senator Chancy Croft
President of the Senate

DATE: April 1, 1975

FROM: Anne Carpeneti
Legislative Counsel

SUBJECT: PIRG - Physicians
Guide

The issue you requested researched is whether a consumer's guide to the Anchorage area physicians, proposed by the Alaska Public Interest Research Group (hereinafter PIRG), would violate the provisions of the Alaska statutes prohibiting physicians from advertising.

The guide proposed by the Alaska PIRG is a compilation of all physicians in the Anchorage area, their addresses, types of practice (group or sole practitioner), specialties, hospital affiliations, office hours, and the language(s) spoken by each physician. It would also include fees charged by each physician for an initial visit, a routine office visit, a routine hospital visit, and for various tests including a chest X-ray, throat culture, and a complete blood count. The guide will not contain evaluations of a physician's ability or reputation and will not include self-aggrandizing statements by physicians. All information reported will be factual and set out in a uniform, nondiscriminatory manner. The data for the guide will be collected by telephone interviews with physicians or persons on their staffs. A copy of the data taken over the phone will be sent to each physician so that he/she may correct errors or misstatements. The guide will be sold to consumers at a nominal cost.

AS 08.64.330(b) provides that a license to practice medicine or osteopathy may be revoked for unprofessional or dishonorable conduct as defined by AS 08.640.380(3), or for professional incompetence. AS 08.64.380(3) contains in its definition of unprofessional or dishonorable conduct subparagraph D, providing that advertising professional services to the public except for notice of opening, closing, or removing practice is unprofessional conduct. There is no legislative history to aid in the interpretation of AS 08.640.-380(D); on its face however, the prohibition of advertising by physicians in Alaska is very broad. Comparable provisions in other states are generally narrower than the Alaska provision. For

MEMORANDUM

Senator Chancy Croft
April 1, 1975
Page Two

example, California prohibits physicians from deceitful advertising, advertising without using the advertiser's name, advertising claiming treatment for regulation or reestablishment of the menses, and advertising treatment of venereal disease, impotence, and other sexual disorders. Deering's Business and Professions Code Annotated, sections 2380, 2380.5, 2381, 2382. Presumably, advertising that does not fall into the above categories is not prohibited in California. In Alaska, however, the statute bars all advertising except notice of opening, closing, or removing practice.

It is not clear whether supplying information in response to a questionnaire by a nonprofit public interest group which plans to publish a consumer's guide falls within the meaning of advertising envisioned by the drafters of the statute. In Missouri Dental Board v. Eastern Dental Co., 256 S.W. 2d 832 (Mo. App. 1953), the court held that the word advertise, in a statute prohibiting dentists from advertising, means to give public notice by emphasizing desirable qualities in order to arouse a desire to purchase. In State v. Guardian Foundation of Texas, 128 S.W. 2d 880 (Tex. App. 1939), the court defined advertising as meaning more than merely announcing or making something known to the public, advertising according to the court meant making information known to the public for the purpose of selling a product or service. Under the definitions in Eastern Dental Co. and Guardian Foundation of Texas it does not seem that the proposed guide to physicians would be considered advertising. The purpose of the guide is to provide information to consumers in the Anchorage area so that they may make a more informed choice when selecting a physician, and not to sell the services of a particular physician or the medical community in general.

The proposed guide does not seem to create the risk of the evils that AS 08.64.380(3)(D) presumably was enacted to avoid. Such statutes are usually enacted for the purpose of maintaining a high standard of competency among medical professionals, to protect the medical profession against commercialized exploitation, and to protect the public from deception, particularly members of the public susceptible to "bait" advertising or promises of quick physical relief. Semler v. Oregon State Board of Dental Examiners, 294 U.S. 608, 79 L.Ed. 1086 (1934). A consumer's guide to physicians in a format intended to inform the public without stressing the comparative differences among the physicians listed could only serve to strengthen the standards of professionalism and the avoidance of situations where the public is misled or duped by unscrupulous practitioners.

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Senator Chancy Croft
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There is little help from other jurisdictions in deciding the issue. Cities in Illinois and New York have consumer's guides to physicians; however, the prohibitions against advertising by physicians in Illinois and New York are significantly narrower than the Alaska prohibition.^{/1} Thus the fact that the Illinois and New York provisions have not prevented the publication of consumer's guides does not provide definitive guidance to an interpretation of Alaska's statute. There is litigation in the United States District Court of Maryland involving

/1 The Illinois Medical Practice Act provides

Section 16m. MISLEADING ADVERTISING - PENALTY. Any person, not being licensed in this State to practice medicine in all of its branches, who shall hold himself out by any sign or advertisement, or by a writing of any kind, to treat human ailments without therein attaching to his name a word or words indicating the system, method or kind of practice which he is lawfully licensed to pursue in this State, shall be deemed guilty of a misdemeanor, and upon conviction thereof shall be punished by a fine of not less than one hundred dollars nor more than five hundred dollars, or by confinement in the county jail not more than one year, or by both such fine and imprisonment, in the discretion of the court.
Illinois Annotated Statutes, Chapter 91.

The New York Statute provides for revocation, suspension, or annulment of a license to practice medicine, osteopathy, or physiotherapy if it is found

(d) That a physicial, osteopath or physiotherapist offered, undertook or agreed to cure or treat disease by a secret method, procedure, treatment or medicine or that he can treat, operate and prescribe for any human condition by a method, means or procedure which he refuses to divulge upon demand to the committee on grievances; or that he has solicited or advertised for patronage by means of handbills, posters, circulars, letters, stereoptical slides, motion pictures, radio, television, magazines, telephone directories, classified telephone directories, or other directories; except, however, the publication, distribution and circulation by any group duly organized and existing as a non-profit insurance plan, pursuant to article nine-c of the state insurance law, or classified professional directories among its subscribers and members, stating group and participating physicians, osteopaths and physiotherapists, their addresses, telephone numbers and special branch of profession practiced, shall in no wise be deemed violative of the provisions of this subdivision; or by means of flamboyant or glaring or flickering signs; or
New York Education Code, Section 5314 (2)(d).

MEMORANDUM

Senator Chancy Croft
April 1, 1975
Page Four

Maryland's prohibition against advertising by physicians, which is almost as broad as Alaska's provision.^{/2} The plaintiffs, various public interest groups in Prince George County, Maryland, are seeking to have the Maryland prohibition declared unconstitutional on First Amendment grounds. However, there has been no decision handed down in the case.

If the provisions of AS 08.64.330(b) and 380(3)(D) are interpreted to prohibit publication of the consumer's guide to physicians, there is a serious question as to whether the provisions would withstand a constitutional challenge on the grounds that they violate the free speech provisions of the United States and Alaska Constitutions, as found in the First Amendment to the Constitution of the United States and Article 1, Section 5, of the Alaska Constitution.

The First Amendment prohibits Congress from making laws abridging freedom of speech, press and the right of people to assemble peaceably. Its prohibitions are applicable to the states through the due process clause of the Fourteenth Amendment. Gitlow v. New York, 268 U.S. 652, 69 L.Ed. 1138 (1924). The Supreme Court has found that a necessary incident of First Amendment freedoms is the right to receive and possess information and ideas. Stanley v. Georgia, 394 U.S. 557, 22 L.Ed.2d 542 (1969). It is not entirely clear, however, whether actions to acquire information to be used in connection with First Amendment freedoms fall within the protection of the First Amendment. In Zemel v. Rusk, 381 U.S. 1, 14 L.Ed.2d 1179 (1965), the court held that the First Amendment does not carry with it the unrestrained right to gather information. In Branzburg v. Hayes, 408 U.S. 665, 33 L.Ed.2d 626 (1972), the court gave limited recognition to the right of news gathering, although it found that a newsman is not privileged to refuse to reveal his sources in response to a proper grand jury investigation. A three judge District Court in Alabama recently held that the First Amendment right to publish must logically include reasonable access to information and the right to gather information, particularly where the information is available to the general public. Lewis v. Baxley, 368 F. Supp. 766 (M.D. Ala., M.D. 1973). In Houston Chronicle Publishing Co. v. Kleindienst, 364 F. Supp. 719 (S.D. Tex. 1973), the court, in invalidating a rule giving the United States attorney's office unlimited discretion in denying newsmen interviews with federal prisoners, held that a newspaper publisher's right to seek out news is an integral part of its First Amendment right to publish news.

^{/2} Article 43, Section 129 of the Annotated Code of Maryland (1971 Replacement Volume) and Regulation F promulgated pursuant thereto permit only the use of business cards, change of address notices, and small signs outside and on the door of the physician's office.

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Senator Chancy Croft
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The trend of decisions in the courts indicates that the right to gather information probably inheres in the right to receive and publish information, and is protected by the First Amendment. Thus it appears that the Alaska PIRG has the right under the First Amendment to gather and publish a consumer's guide to physicians in the Anchorage area.

First Amendment rights enjoy special protection as compared with other constitutional rights. They are not, however, absolute. Obscenity and "fighting words", for example, are not protected by the First Amendment. Purely commercial advertising may also be prohibited without running afoul of the First Amendment. Valentine v. Chrestensen, 316 U.S. 52, 86 L.Ed. 1262 (1942), Pittsburgh Press Co. v. Pittsburgh Human Relations Commr., 413 U.S. 376, 37 L.Ed.2d 669 (1973). The courts have made a distinction between purely commercial and noncommercial advertising. New York Times v. Sullivan, 376 U.S. 254 (1964), and Pittsburgh Press, supra, both recognized that Chrestensen applies only to purely commercial advertising.

Even if the publication planned by the Alaska PIRG ^{is} found to be advertising under AS 08.64.380(3)(D), it is not purely commercial advertising. It is not intended to financially benefit physicians listed in the guide or the publishers of the guide. It is intended to give consumers a factual guide to all physicians in the Anchorage area so that they may make an informed choice in the vital area of health care.

The validity of restrictions on the exercise of First Amendment rights depends on the weighing of two factors: (1) the type and strength of the government interest in imposing the restriction, and (2) the type of disability imposed on the individual and the scope of the restriction imposed. The state's interest in the present case is maintaining a high standard of competency among medical professionals and protecting the public against misleading and deceptive advertising. Semler, supra.

The state's interest in maintaining high professional standards and protecting the public is a valid interest. If the Alaska prohibition is found to proscribe the guide, by barring all advertising by physicians, AS 08.64.380(3)(D) excludes advertising which does not demean the professionalism of physicians and which does not deceive the public. Indeed, a consumers' guide such as that proposed by the Alaska PIRG, by providing a nondiscriminatory factual compilation of physicians, their education, specialties, etc., supports the goals that are the basis of the statute. There seems to be little rational relationship between the broad prohibition of AS 08.64.380(3)(D) and the state's interest in enacting it. Thus it appears that the statute probably would fall against a constitutional challenge on the grounds that the state's interest is outweighed by the scope of the restriction.

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Senator Chancy Croft
April 1, 1975
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Assuming that the guide is found to be advertising under AS 08.64.-380(3)(D), the statute is probably also invalid due to overbreadth. An overbroad statute regulates rights which are protected by the First Amendment as well as those rights which are not constitutionally protected. By prohibiting all advertising, whether purely commercial or not, or whether rationally related to the state's interest or not, the statute has a chilling effect on the exercise of First Amendment rights. Broadrick v. Oklahoma, 413 U.S. 601, 37 L.Ed.2d 830 (1973). Overbroad statutes relating to First Amendment rights are void on their face, and cannot be used to regulate even that kind of speech or expression that is not constitutionally protected. Thus, until AS 08.64.380(3)(D) is amended by the legislature or judicially construed to cure its overbreadth, it probably is not valid to prohibit any advertising by physicians in Alaska.

In conclusion, it appears that AS 08.64.380(3)(D) should not be read to prohibit a consumer's guide to physicians as proposed by the Alaska PIRG. If, however, the statute is interpreted to bar such a guide, the application of the statute would probably violate the First Amendment to the Constitution of the United States.

POSITION PAPER
ON
SENATE BILL 411

An Act entitled: "An Act relating to advertising of professional services by physicians; and providing an effective date."

To change the intent of paragraph 3 (D) from prohibiting advertising except for "professional services to the public except for notice of opening, closing, or removing practice", to "untruthful or misleading advertising of professional services".

Position: This Division believes this amendment is inappropriate and inadvisable. Advertising by the medical profession would lead to increased costs of medical care and is considered to be unethical by the American Medical Association. The Division does not support passage of this amendment.

Recommend By:

James L. Shuster MD
(Division Director)

5-8-75
(Date)

Approved By:

(Commissioner)

(Date)

Comments by Governor's Office:

By:

(Date)

*Withdrawn in
favor of
May 8, 1975*

POSITION PAPER
ON
SENATE BILL NO. 411

An Act relating to advertising of professional services.

This measure repeals that definition of unprofessional or dishonorable conduct which states "advertising professional services to the public except for notice of opening, closing, or removing practice" and substitutes as the definition, "untruthful or misleading advertising of professional services."

This measure appears to substitute a more comprehensive and satisfactory definition.

The Department favors passage of this measure.

Recommended By: *Donald K. Friedman* *5/9/75*
Division Director Date

Approved By: *Francis S. Williamson* *5/9/75*
Commissioner Date

Comments by Governor's Office:

By: _____ Date _____

10
SB-411

ALASKA PUBLIC INTEREST RESEARCH GROUP

P. O. BOX 1093
ANCHORAGE, ALASKA 99510

PHONE 274-6765

May 6, 1975

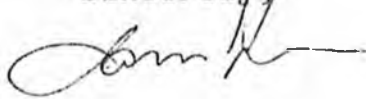
Senator George Hohman
Chairman, Senate HESS
Pouch V
Juneau, Alaska 99811

Dear Senator Hohman:

This letter is a request for your support on the passage of SS SB 411, an act which would amend the state's laws pertaining to advertising by physicians. My interest in the legislation is as follows: Earlier this year our organization was planning to publish a consumers guide to doctors in the Anchorage area. We were advised that it may not be legal for a doctor to cooperate in publishing of such a guide due to AS 08.64.330-380 (3)(d) which limits advertising by doctors to the opening, closing, and reopening of practice.

This bill is, as I understand it, an attempt to exempt the publishing of a doctors guide, which is comprehensive, non-discriminatory, and which does not make qualitative statements about doctors' abilities, from normal restrictions regarding advertising. I am enclosing other correspondence on this matter, along with publications which describe the guide we are hoping to publish. I would appreciate your consideration of this request as early as possible, since we had planned on publishing the guide this summer. Thank you.

Sincerely,



James Love
Director, Alaska Public Interest
Research Group, Inc.

ALASKA PUBLIC INTEREST RESEARCH GROUP

P. O. BOX 1093
ANCHORAGE, ALASKA 99510

PHONE 274-8755

April 22, 1975

Representative Terry Gardner
Chairman, House Judiciary Committee
House of Representatives
Juneau, Alaska 99801 .

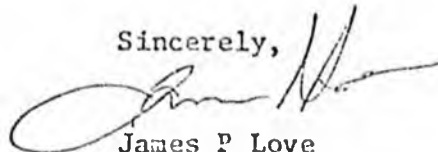
Dear Terry,

Enclosed is a packet of back up information regarding the problems we are having getting a go ahead on publishing a consumer guide to Anchorage area Doctors. Present state statutes are vague, but restrictive, insofar as advertising of physicians services is concerned. AkPIRG is interested in publishing a guide to doctors services similar to guides originally published by the Nader Health Research Group (Nader Health Group publication enclosed), and outlined in a recent issue of Consumer Reports (enclosed).

I wrote Chancy Croft in March hoping to get a clarification of the legal problems, and asked that he get an AG opinion, and introduce legislation to clear up ambiguities in the existing statute. Chancy requested an AG opinion, and an opinion from Legislative Affairs. (Chancy's letter to Gross, and LA opinion by Carpeneti, are enclosed). Carpeneti wrote an opinion which supported our position that the consumers guide does not constitute advertising. The AG has been sitting on Chancy's request since March 19, and will probably say that the guide is illegal, but that the statute is unconstitutional. All this leaves us in a bad spot. Without enabling legislation, we would have to get a Supreme Court decision to publish the guide (we don't have the bucks for litigation at present), and any legal problems would probably preclude any hopes for a majority of doctors cooperating on the survey.

It would be a great help to us if someone would ask Carpeneti to draft an amendment to the advertising law, (probably would be brief) so that we can have a chance of passage this year. I would appreciate receiving your response to this as soon as possible. Thank You.

Sincerely,



James P Love
Director,
Alaska Public Interest Research Group



Alaska State Legislature

SENATOR CHANCY CROFT
PRESIDENT OF THE SENATE

POUCH V
JUNEAU, ALASKA 99801
PHONE 907-465-3755

425 G STREET
ANCHORAGE, ALASKA 99501

March 19, 1975

Avrum M. Gross, Esq.
Attorney General, State of Alaska
Pouch K
Juneau, Alaska 99811

Dear Av:

I have received a letter from the Alaska Public Interest Research Group outlining their interest in publishing a consumers guide to physicians in the Anchorage area. This publication will be patterned after a guide designed by the Ralph Nader Health Care Research Group. The goal is to publish a comprehensive directory of physicians, with information for the health care consumer regarding the qualifications, services, and costs which a particular physician offers.

They are concerned that the provisions of AS 08.64.330 - 380(3)(d) may make physicians wary of participating in the proposed survey because of the definition of unprofessional or dishonorable conduct defined as "advertising professional services to the public, . . .".

I request that you prepare an opinion regarding the legality of the physicians cooperating in the survey in light of the provisions of the above statute. Legislation could be introduced defining the limits of information permissible in the listing to prevent any misunderstanding on the part of the Alaska Public Interest Research Group, the physicians and the general public. I would appreciate receiving the opinion as soon as possible.

Very truly yours,

Chancy Croft
Chancy Croft

cc: Alaska Public Interest Research Group

hallucinogenic or stimulant drugs, as defined in AS 17.12.130 or addiction to the use of narcotic drugs as defined in AS 17.12.230 (13) ;

(C) conviction of an offense involving moral turpitude;

(D) advertising professional services to the public except by notice of opening, closing, or moving practice;

(E) making untruthful or fraudulent statements in the application for examination, or deceiving or cheating during the application for license, or procuring a license by deceit or fraud;

(F) violating the Controlled Substances Act (P.L. 91-513 Stat. 1242) or any other federal law pertaining to medical practice and drugs;

(4) Repealed by § 1 ch 148 SLA 1970.

(5) "department" means the Department of Commerce. (37-3-3-94, 35-3-38 ACLA 1949; am § 27 ch 77 SLA 1969; am § 3 ch 103 SLA 1970; am § 25-27 ch 148 SLA 1970; am § 9 ch 32 SLA 1971; am § 1 ch 117 SLA 1971; am § 4 ch 85 SLA 1972)

Cross reference.—As to malpractice actions, see AS 09.55.530—09.55.550.

Effect of amendment.—The 1972 amendment, in paragraph (3)(F), substituted "Controlled Substances Act, P.L. 91-513, or any other federal law pertaining to medical practice and drugs" for "Harrison Anti-Narcotic Act."

Legislative committee report.—For report on ch. 32, SLA 1971 (HB 111 am), see 1971 House Journal, p. 138.

The statutory definition of practicing medicine or surgery is very broad and within the literal meaning of the words would include the practice of

dentistry, optometry, podiatry, practice, etc. By its very breadth this definition precludes a literal interpretation inasmuch as dentists, for example, have had a separate licensing procedure as long as have those who practice medicine or surgery. 1961 Op. Att'y Gen., No. 17.

Prescription of drugs or medicine by chiropractor.—It is illegal for a chiropractor, without additional qualifications, to prescribe drugs or medicine to sick or injured persons. 1961 Op. Att'y Gen., No. 21.

Cited in *Leege v. Martin*, Sup. Ct. Op. No. 131 (File No. 256), 379 P.2d 447 (1963).

Chapter 66. Motor Vehicle Dealers.

- Section
- 10. Dealers to register
- 20. Application, bond, and fee
- 30. Form of application
- 40. Filing application for registration

- Section
- 50. Renewal of registration
- 60. Bond
- 70. Action on bond
- 80. Penalties
- 90. Dealer defined

Sec. 08.66.010. Dealers to register. Every dealer in motor vehicles, trailers or semi-trailers shall, as a condition to engaging in business in this state, register annually with the Department of Revenue. (§ 1 ch 135 SLA 1959)

Sec. 08.66.020. Application, bond, and fee. Application for dealer registration shall be accompanied by an annual registration fee of

November 18, 1974

MEDICINE

The Doctors Guide

When choosing a doctor, Americans usually have less information to go on than they do when shopping for a toaster, color TV or new car. They don't know how to determine a physician's qualifications and are reluctant to ask about such delicate matters as how much he charges for his services. For their part, doctors have been discouraged from publishing details about their training or practice for fear of violating state laws against professional advertising. But during the past year, consumer groups have begun to tear away at the mystique that has traditionally surrounded the medical profession by issuing directories designed to help the layman make an informed choice of a doctor.

Volunteers: The first was a guide to doctors in Prince Georges County, Md., published last winter by Ralph Nader's Health Research Group. More recently, Nader-inspired consumer task forces have issued similar directories for Queens County, N.Y., Sangamon County (Springfield), Ill., and Hawaii; others are scheduled to come out soon for communities in Massachusetts, Colorado and Washington. In most instances, the directories have been put together by student and faculty volunteers at local colleges by telephone interviews and follow-up questionnaires.

The directories are a revolutionary departure from the published information now available on physicians. The Yellow Pages list only a doctor's address, phone number and, possibly, his specialty. Professional directories put out by the American Medical Association or local medical societies may include the physician's age, medical school and type of practice. Most telephone referral services run by medical societies provide only the names of two or three doctors from which the caller can make a choice. But typically, the consumer guides list the doctor's training, hospital affiliation and specialty, together with such items as the fees he charges for office visits, whether he makes house calls, treats emergencies, accepts medicare and Medicaid patients, plus what tests he can give in his office and their cost. In some cases, doctors who refuse to provide information are listed as "uncooperative."

List: The compilation of the guides has raised the hackles of the profession. According to Robert McGarrah, attorney for the Health Research Group, the Prince Georges Medical Society told its members that any doctor who provided information for the Prince Georges directory might be violating state laws against advertising. As a result, only 115 of the 461 doctors practicing in the county cooperated. The New York Public Interest Research Group had better luck putting together the Queens guide. The local

medical society refused to supply a list of physicians for the survey, but did not actively try to put a stop to it. Of the 589 doctors queried, an NYPIRG spokesman said, more than half responded to questions and most listed their fees. However, about 38 per cent of the county's physicians could not be reached because the state medical directory used by the surveyors was out of date.

Even when they agree in principle with the idea of the directories, some doctors complain about the abrasive manner displayed by the consumer advocates as they go about their task. "They came on like a blitz and declined meaningful communications," says one Prince Georges Medical Society member. Even some doctors listed in the Queens guide as cooperative voice a range of reservations. A few claimed that they didn't know how the information had been obtained and said they did not want to be listed. One complained that the information had been supplied by her son and that much of what appeared in the directory was wrong. Others warned, quite sensibly, that such a guide would not assure a person of choosing a good doctor. "It's not a good idea for patients to shop around," says Dr. Cecil Reid, a Queens GP. "You can't equate care with fees." A better way of selecting a doctor, several pointed out, is asking a neighbor, a hospital, the medical society or another doctor.

While most states have laws that prohibit doctors from advertising, it remains unclear how these restrictions relate to consumer directories. Legal counsel for the Prince Georges Medical Society interprets the listing of information that might give a doctor an apparent competitive advantage, such as his fees, as "indirect" advertising and a violation of state law. However, the HRC has brought suit to challenge the interpretation. Meanwhile, the American Medical Association's Judicial Council has ruled that a doctor is not violating medical ethics by listing his name in a consumer directory so long as it is open to all the physicians in the community and does not include "any self-aggrandizing statement or qualitative judgment" regarding his competence as a medical practitioner. The ruling leaves open the question of listing fees. But if adopted by the AMA House of Delegates next month, the ruling could do much to remove the present legal obstacles faced by the consumer advocates.

Newsweek, November 18, 1974

REPORT OF THE JUDICIAL COUNCIL

Report: C
(C-74)

Subject: Community Medical Directories

Presented By: George W. Petznick, M.D., Chairman

Referred To: Reference Committee D
(William A. Sodeman, M. D., Chairman)

COMMUNITY PROFESSIONAL DIRECTORIES

It is not unethical for a physician to authorize the listing of his name and practice in a directory for professional or lay use which is intended to list all physicians in the community on a uniform and non-discriminatory basis. The listing shall not include any self-aggrandizing statement or qualitative judgment regarding the physician's skills or competence. The American Medical Directory provides an example of the kind of information that may be properly listed in national as well as community directories for health service personnel. Likewise, specialties or specialty practices used in the American Medical Directory should set the pattern for specialty designations.

ADOPTED BY THE HOUSE OF DELEGATES DECEMBER, 1974.

de guide
SB911

ALASKA PUBLIC INTEREST RESEARCH GROUP

P. O. BOX 1093
ANCHORAGE, ALASKA 99510

PHONE 274-6765

April 22, 1975

Representative Terry Gardner
Chairman, House Judiciary Committee
House of Representatives
Juneau, Alaska 99801

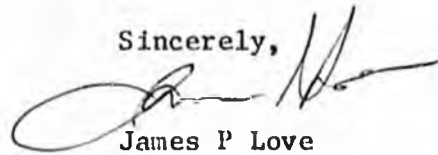
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James P Love
Director,
Alaska Public Interest Research Group