

Psychiatrische

Universität Zürich ()

Ambulante, teilstationäre und stationäre Dienste

DR. F.X. VOLLENWEIDER, MD

Prof.Dr.med. Daniel Hell

Klinischer Direktor

Sektor Ost und zentrale Spezialangebote

Lenggstrasse 31

Postfach 68

8029 Zürich 8

Tel. 01-384 21 11

Fax 01-383 44 56

Dr. Russell Katz

Food and Drug Administration

Director, Neuropharmacological

Drug Products

5600 Fishers Lane

Rockville, MD

USA

September 14, 2001

Re: Human Phase II study – Safety and efficacy of MDMA-assisted psychotherapy in the treatment of chronic PTSD

Dear Doctor Katz,

I am the head of a 14-person psychiatric research team at the University of Zurich with extensive experience administering MDMA to MDMA-naïve experimental subjects. With the support from the Swiss Science Foundation and the Swiss Federal Office of Health, we have conducted over the last five years a series of placebo-controlled, double blind studies into the psychological and neurobiological effects of MDMA (1.5-1.7mg/kg) in more than 80 healthy human volunteers using positron emission tomography (PET), 3D-EEG, measures of sensorimotor gating, and neuropsychological measures. A list of our publications on our MDMA research is attached.

This letter is to offer my strong support for the proposed “Human Phase II study – Safety and efficacy of MDMA-assisted psychotherapy in the treatment of chronic PTSD” to be conducted by Dr. Michael Mithoefer and sponsored by MAPS. I have met with Dr. Doblin in Zurich and have carefully reviewed Dr. Mithoefer’s protocol for this study. In sum, this is a careful and well designed study using state of the art methodology to evaluate the potential use of MDMA in treatment-resistant chronic PTSD patients who have failed to obtain relief from at least one full trial of an SSRI. The two doses of MDMA, each 125 mg., have been carefully chosen and should be of minimal risk when administered in a controlled clinical setting.

In our studies, we found no evidence that one or two doses of pure MDMA (e.g. 120-140 mg.) produce long-lasting neurological sequelae in humans. Moreover, a detailed retrospective analysis of our data obtained in MDMA subjects shows that one or two doses of MDMA produce no long-lasting effects on psychological and neuropsychological

measures, cerebral blood flow ($H_2^{15}O$ -PET), and electrophysiological indices of information processing such as prepulse inhibition of the startle reflex (PPI) and brain wave activity (EEG/ERP).

Most importantly, preliminary analysis using PET and the radioligand McN-5256 revealed no significant changes in 5-HT transporter binding after a single dose of MDMA (1.5-1.7 mg/kg) was administered to 5 MDMA-naïve volunteers, evaluated with PET before their first MDMA session and again after 4 weeks (Vollenweider et al. 2000). We have a new PET paper in preparation based on research with several additional MDMA subjects (N=8) and a separate control group (N=6) receiving 3 PET scans after a placebo in order to more fully account for variations in the PET data. This expanded study confirmed our pilot study data showing no significant changes in 5-HT transporter binding after a single dose of MDMA (1.5-1.7 mg/kg). These findings support our initial assumption, based on a review of the existing literature, that such doses would not produce measurable neurotoxic effects.

The lack of measurable reductions in 5-HT transporter binding from doses of MDMA in the range of those to be administered in the protocol, combined with the absence of significant neuropsychological and other alterations, suggest that a rational risk-benefit analysis generates the conclusion that it is ethical to conduct the protocol as designed. As a result, I strongly recommend that this protocol be approved. If you have any questions about any of our studies, please feel free to contact me.

A handwritten signature in black ink, appearing to read 'Franz Vollenweider', with a stylized, cursive script.

Dr. Franz X. Vollenweider, PD, M.D.
Head Behavioral Pharmacology and
PET program PUK Zurich

Reference List

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