

TO: U.S Sentencing Commission

FROM: Rick Doblin, Ph.D.

President, Multidisciplinary Association for Psychedelic Studies (MAPS)
3 Francis Street
Belmont, MA 02478
617 484-8711

RE: Proposed Increase of MDMA Penalties

Sent via facsimile

(202) 502-4699

ATTN: Michael Courlander

To whom it may concern:

I am writing for two primary reasons to oppose any increases in the penalties for MDMA. The first reason is that enhanced penalties will increase the difficulties in obtaining FDA and DEA permission to conduct legitimate scientific research into the risks and benefits of the therapeutic use of MDMA as an adjunct to psychotherapy. The second reason is that while MDMA does have its risks, as does any other drug or even any non-drug recreational activity, these risks have greatly exaggerated, particularly the risk of serious functional or behavioral consequences from MDMA neurotoxicity.

I've recently completed a dissertation on the regulation of the medical uses of Schedule 1 drugs, primarily MDMA and marijuana, for a Ph.D. in Public Policy from the Kennedy School of Government, Harvard University. I am also the founder and current president of the Multidisciplinary Association for Psychedelic Studies (MAPS), a 501 (c) (3) membership-based research and educational organization that was founded in 1986. MAPS has about 1900 members, mostly from the United States. MAPS assists scientists to design, obtain approval for, fund, conduct and report on FDA-approved research with psychedelic drugs and marijuana. MAPS' top priority is to develop MDMA (Ecstasy) into a prescription medicine as an adjunct to psychotherapy for a variety of clinical indications.

MAPS opened an FDA Drug Master File (DMF) for MDMA in 1986, with data from FDA-required 28-day MDMA toxicity studies in the dog and the rat. MAPS has been working ever since to sponsor research into the risks and benefits of MDMA-assisted psychotherapy. MAPS donated funds to support the first MDMA neurotoxicity primate study ever conducted, under the direction of Dr. George Ricaurte. MAPS also recruited the first subjects for Dr. Ricaurte's human spinal tap studies of MDMA neurotoxicity, with myself as the first subject.

Scientists associated with MAPS will submit a protocol to FDA in April, 2001

seeking permission to study the use of MDMA-assisted psychotherapy in the treatment of patients suffering from Post-traumatic Stress Disorder (PTSD). This protocol, if approved, will be the first opportunity that scientists have had to study the therapeutic use of MDMA since DEA placed MDMA in Schedule 1 in 1985.

Historically, as the penalties for the non-medical uses of a drug are increased, political pressure develops to suppress or restrict research into the beneficial uses of that drug. This has been the case with heroin, marijuana and the psychedelics.

There is also a tendency for government agencies and anti-drug groups to overestimate the risks of drugs that have been criminalized. Examples include the LSD chromosome damage scare, which was supposedly going to result in a generation of children born with birth defects to users of LSD, and the crack baby phenomenon, which was shown in later research to be vastly overstated. Similarly, the likely risks of MDMA neurotoxicity have also been dramatically exaggerated. I'll leave this to the medical researchers to document.

Sincerely yours,

Rick Doblin, Ph.D.