



August 1, 2006

Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-0018-IFC  
P.O. Box 8015  
Baltimore, MD 21244-8015

Re: Version 8.1 of the NCPDP Script Standard. (File Code CMS-0018-IFC)

Dear Centers for Medicare and Medicaid Services:

We appreciate the opportunity to comment on the proposed rule<sup>1</sup> (“Proposed Rule”) relating to Version 8.1 of the NCPDP Script Standard.

### **INTRODUCTION**

Zix Corporation is the parent company of PocketScript, Inc. (“PocketScript”), the leading vendor for e-prescribing and prescription management services.

We have been in the electronic prescribing business since July 2003. Since that time we have processed well over 6 million prescriptions and are currently transporting electronic prescriptions at a rate exceeding 100,000 per week. We are certified with RxHub, Express Scripts, Medco Health Solutions, and Caremark/Advance PCS for the purposes of accessing eligibility, formulary, and dispensed drug history information, and we are certified with SureScripts to send prescriptions via electronic data interchange. Our PocketScript e-prescribing service is the e-prescribing vendor for the country’s largest e-prescribing initiative – the eRX Collaborative in Massachusetts. And, we currently have or will have in the near future a meaningful number of prescribers using our system to write electronic prescriptions in California, Louisiana, New Jersey, New York, North Carolina, and Pennsylvania, in addition to prescribers in other states across the country. Our PocketScript system processed more than 1.3 million electronic prescriptions in the April through June 2006 period.

### **COMMENT ON “PROVISIONS”**

We agree with permitting the voluntary use of the backward compatible Version

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<sup>1</sup> Centers for Medicare and Medicaid Services, Medicare Program; Identification of Backward Compatible Version of Adopted Standard for E-Prescribing and the Medicare Prescription Drug Program (Version 8.1); Proposed Rule, 71 Fed. Reg. 36020 (June 23, 2006).

8.1 of the NCPDP SCRIPT Standard as satisfying the requirements of the adopted standard Version 5.0, and we are already implementing the use of Version 8.1.

Relative to the question posed by CMS as to whether and when to retire Version 5.0, we recommend that Version 8.1 be expeditiously adopted as the baseline standard and that Version 5.0 be retired as soon as reasonably practicable. Furthermore, CMS should consider retiring Version 5.0 without any requirement for backward compatibility in order to avoid unnecessary implementation complexity for future versions. It has been our experience that few, if any, of our industry trading partners have put Version 5.0 systems into full production use. Expeditiously retiring Version 5.0 would minimize the costs associated with maintaining backward compatibility, as and when future versions (beyond Version 8.1) of the NCPDP SCRIPT Standard are released and codified as the defining standard.

### **CONCLUSION**

We hope CMS finds this information useful. For further information or if we may offer additional assistance, please contact Ronald A. Woessner, Esq., Senior Vice President, Zix Corporation at 214.370.2219.

Respectfully submitted,

ZIX CORPORATION

/s/ Ronald A. Woessner

Ronald A. Woessner

Senior Vice President and General Counsel

/s/ David J. Robertson

David J. Robertson

Vice President, Engineering