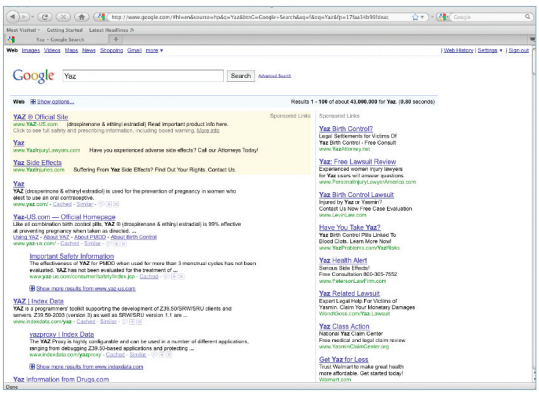
Vanity URLs are fast replacing branded links in paid search, with the wake of FDA action, reports **Matthew Arnold**

One Click Rule, RIP

The use of paid search by pharmas crashed in the aftermath of DDMAC's issuance of 14 enforcement letters for sponsored links a year ago. Exposures plummeted by 59% within a week of March 26, 2009, when the letters were sent out, and were down 84% by the end of June, but have since crept back, according to comScore data. However, with the agency's elimination of the "one click rule" —an unwritten assumption that so long as full-risk information was a click away, marketers were OK —has wrought changes in how pharmas do search.



FDA issued 14 letters regarding sponsored links, thus eliminating the "one click rule" and changing search

First of all, sponsored links sending viewers to so-called vanity URLs, bearing the name of a campaign rather than a product, have largely replaced brand.com links, even if that's where you end up.

"It's the accepted method that everyone's gone to," says John Mangano, VP at comScore.

The agency's beef, basically, was with sponsored links being treated differently than any other form of advertisement discussing both a brand and the condition it treats, in which full-risk information must be disclosed front and center.

"Prior to the letters, many advertisers were running search ads both with brand," says Google head of industry for health Amy Cowan, "and now all have moved to running only branded or only unbranded."

The shift is important because it means the uncoupling of brand and condition in searches, says comScore's Mangano. Now, if you can't remember the name of the brand in the ad you saw and you instead search on a condition for which there are multiple therapies, you're likely to get a stack of vanity URLs and land on a brand.com site for a rival product.

At DDMAC's hearings on online promotion of pharmaceuticals back in November, Google unveiled proposed formats for sponsored links. The formats—one for links making product claims and the other for those carrying a black-box warning—weren't cleared with FDA in advance, since only drug companies can submit materials to the agency for preapproval. But the black-box format has since been green-lighted by the agency and is now in use by Bayer for Yaz, Lilly for Symbyax and Strattera, and Amgen for Enbrel.

The format is that of a branded link, sans product claim, but with a fixed line below advising: "Click to see full safety and prescribing information, including boxed warning," and an additional "More info" link.

Google's Cowan says that advertisers are getting comfortable with sponsored links again after a nasty shock. "In terms of sentiment, we have seen that people are enthusiastic about digital for 2010 and having paid search as a central part of their strategy," said Cowan. ■

Bad links elicit letters

On March 26, 2009, the FDA's Division of Drug Marketing, Advertising and Communications issued a flurry of 14 untitled letters regarding sponsored links the agency found violative due to lack of risk information. The letters shocked pharmas, which had thought themselves safe under an unwritten "one click rule." Not so, said FDA, and industry use of paid search nearly flatlined. Letters were issued to:

- Lilly, for Cymbalta, Gemzar and Evista
- Hoffman-LaRoche, for Boniva, Pegasys and Xeloda
- Merck, for Januvia, Singulair and Emend
- Boehringer Ingelheim, for Spiriva HandiHaler, Flomax and Mirapex
- Genentech, for Avastin, Herceptin, Lucentis, Pulmozyme, Xolair and Rituxan
- Novartis, for Femara, Diovan, Exforge, Exjade and Gleevec
- Pfizer, for Aromasin, Caduet, Chantix, Lyrica and Celebrex
- Johnson & Johnson, for Prezista
- Cephalon, for Fentora and Treanda
- Forest Laboratories, for Bystolic, Campral, Lexapro and Namenda
- GlaxoSmithKline, for Avandia, Avandamet, Avandaryl, Avodart, Coreg CR and Tykerb
- Bayer, for Levitra and Mirena
- Biogen, for Tysabri
- Sanofi-Aventis, for Plavix