



DIVISION OF
CORPORATION FINANCE

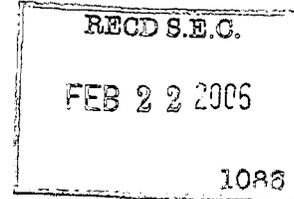
UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-3010

DC
No Act



06025709

February 9, 2006



Margaret M. Foran
Senior Vice President-Corporate Governance,
Associate General Counsel & Corporate Secretary
Pfizer Inc.
235 East 42nd Street
New York, NY 10017-5755

Act: 1934
Section: _____
Rule: 14A-8
Public
Availability: 2/9/2006

Re: Pfizer Inc.
Incoming letter dated December 16, 2005

Dear Ms. Foran:

This is in response to your letter dated December 16, 2005 concerning the shareholder proposal submitted to Pfizer by Frank Randall and Joann Randall. We also have received letters from the proponent dated December 30, 2005 and January 26, 2006. Our response is attached to the enclosed photocopy of your correspondence. By doing this, we avoid having to recite or summarize the facts set forth in the correspondence. Copies of all of the correspondence also will be provided to the proponent.

In connection with this matter, your attention is directed to the enclosure, which sets forth a brief discussion of the Division's informal procedures regarding shareholder proposals.

PROCESSED

MAR 15 2006

THOMSON
FINANCIAL

Sincerely,

Eric Finseth
Attorney-Adviser

Enclosures

cc: Leana Stormont
People for the Ethical Treatment of Animals
501 Front St.
Norfolk, VA 23510

78003

Legal Division
Pfizer Inc
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New York, NY 10017-5755
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OFFICE OF CHIEF COUNSEL
CORPORATION FINANCE

Margaret M. Foran
Senior Vice President-Corporate Governance,
Associate General Counsel & Corporate Secretary

December 16, 2005

VIA HAND DELIVERY

Office of Chief Counsel
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: *Shareholder Proposal of Frank and Joann Randall*
Securities Exchange Act of 1934 – Rule 14a-8

Dear Ladies and Gentlemen:

This letter is to inform you that Pfizer Inc. (“Pfizer”) intends to omit from its proxy statement and form of proxy for its 2006 Annual Meeting of Shareholders (collectively, the “2006 Proxy Materials”) a shareholder proposal (the “Proposal”) and a statement in support thereof received from Frank and Joann Randall (the “Proponent”).

Pursuant to Rule 14a-8(j), enclosed herewith are six (6) copies of this letter and its attachments. Also, in accordance with Rule 14a-8(j), a copy of this letter and its attachments is being mailed on this date to the Proponent, informing them of Pfizer’s intention to omit the Proposal from the 2006 Proxy Materials. Pursuant to Rule 14a-8(j), this letter is being filed with the Securities and Exchange Commission (the “Commission”) no later than eighty (80) calendar days before Pfizer files its definitive 2006 Proxy Materials with the Commission. Pfizer hereby agrees to promptly forward to the Proponent any response from the staff of the Division of Corporation Finance (the “Staff”) to this no-action request that the Staff transmits by facsimile to Pfizer only.

A copy of the Proposal and supporting statement, as well as related correspondence from the Proponent, is attached to this letter as Exhibit A. Pfizer hereby respectfully requests that the Staff concur in our view that the Proposal may be excluded from the 2006 Proxy Materials pursuant to Rule 14a-8(i)(3) and Rule 14a-8(i)(6), because the Proposal is vague and indefinite, and Rule 14a-8(i)(6), because the Proposal is beyond Pfizer’s power to implement.

THE PROPOSAL

The Proposal consists of a resolution that reads, "BE IT RESOLVED, that the shareholders request that the Board issue a report to shareholders on the feasibility of amending the Company's Policy to ensure (a) that it extends to all contract laboratories and that it is reviewed with such outside laboratories on a regular basis, and (b) superior standards of care for animals who continue to be used for these purposes, both by the Company itself and by all independently retained laboratories, including provisions to ensure that animals' psychological, social and behavioral needs are met. Further, the shareholders request that the Board issue an annual report to shareholders on the extent to which in-house and contract laboratories are adhering to this policy, including the implementation of psychological enrichment measures." References in the Proposal to the "Policy" concern Pfizer's Laboratory Animal Care and Use policy (the "Policy").

INTRODUCTION

As noted in the Proposal, Pfizer has adopted a Laboratory Animal Care and Use policy. In this regard, Pfizer is committed to the principles embodied by the 3Rs of animal research: seeking alternatives that Reduce, Replace or Refine our work with animals when such alternatives are available and appropriate. Pfizer also has added fourth and fifth "Rs" as fundamental and important principles: Respect for animals and Recognition of the important contributions that animal-based research makes to our goal of improving human and animal health worldwide. To that end, Pfizer believes that it already implements the "superior standards of care" requested by the Proposal in that Pfizer approaches all research involving animals with the highest level of humane concern.

In addition, the Animal Welfare Act, 7 U.S.C. §§ 2131-2159, and animal welfare regulations, 9 C.F.R. §§ 1.1-4.11, mandate that all animals used in research receive humane care and treatment. Among other things, the Animal Welfare Act (the "Act") requires that all facilities engaged in animal research submit an annual report to the USDA's Animal and Plant Health Inspection Service documenting that the facility is adhering to the standards and regulations under the Act. 7 U.S.C. § 2143.

However, the Proposal asks for additional actions with respect to Pfizer's policies that, for the reasons discussed below, we believe render the Proposal vague and indefinite and beyond Pfizer's power to implement. Therefore, on these grounds, we believe the entire Proposal properly may be excluded from the 2006 Proxy Materials.

ANALYSIS

I. The Proposal Is Vague And Indefinite And Thus May Be Excluded Under Rule 14a-8(i)(3) And Rule 14a-8(i)(6).

The Proposal's references to ensuring "superior standards of care" and ensuring "that animals' psychological, social and behavioral needs are met" render the Proposal so vague and indefinite that it may properly be excluded under Rules 14a-8(i)(3) and 14a-8(i)(6). Rule 14a-8(i)(3) allows the exclusion of a proposal if the proposal or supporting statement is contrary to any of the Commission's proxy rules or regulations. The Staff has consistently taken the position that vague and indefinite shareholder proposals are excludable under Rule 14a-8(i)(3) because "neither the stockholders voting on the proposal, nor the company in implementing the proposal (if adopted), would be able to determine with any reasonable certainty exactly what actions or measures the proposal requires." Staff Legal Bulletin No. 14B (Sept. 15, 2004). Moreover, a proposal is sufficiently vague and indefinite so as to justify exclusion where a company and its shareholders might interpret the proposal differently, such that "any action ultimately taken by the [c]ompany upon implementation of the proposal could be significantly different from the actions envisioned by the shareholders voting on the proposal." *Fuqua Industries, Inc.* (avail. Mar. 12, 1991). In addition, Rule 14a-8(i)(6) permits a company to exclude a shareholder proposal if it is beyond the company's power to implement. A company lacks the power or authority to implement a proposal and may properly exclude it pursuant to Rule 14a-8(i)(6) when the proposal in question "is so vague and indefinite that [the company] would be unable to determine what action should be taken." *Int'l Business Machines Corporation* (avail. Jan. 14, 1992).

On a number of occasions, the Staff has concurred that proposals requesting reports were vague and indefinite (and thus, excludable) when the proposals contained only general or uninformative references to a set of standards or criteria that would be applied under the proposal. For example, in *The Southern Co.* (avail. Feb. 23, 1995), a shareholder proposal requested that the board of directors take steps to "ensure the highest standards of ethical behavior" by employees serving in the public sector. The Staff concurred that this proposal was excludable under the predecessor to Rule 14a-8(i)(6) because the proposal was so vague and indefinite that the proposal was beyond the company's power to implement. In *Int'l Business Machines Corp.* (avail. Feb. 5, 1980), the Staff concurred that the company could omit under the predecessor to Rule 14a-8(i)(6) as vague and indefinite a shareholder proposal requesting a policy paper on "demonstrated affirmative responsibility." The Staff added that "the proponent does not define what is meant by 'demonstrated affirmative responsibility' anywhere in the proposal, and, as a result, it would be impossible for either the management or the stockholders to comprehend precisely what compliance with the proposal would entail." *Id.* Similarly, in *Alcoa Inc.* (avail. Dec. 24, 2002), the Staff concluded that a proposal calling for the implementation of "human rights standards" and a program to monitor compliance with these standards could be excluded under Rule 14a-8(i)(3) as vague and indefinite).

The Proposal's references to "superior standards of care" and ensuring "that animals' psychological, social and behavioral needs are met" are vague and indefinite in the same manner as requests for reports on "demonstrated affirmative responsibility" (*IBM*) and "human rights standards" (*Alcoa*) and references to "ensur[ing] the highest standards of ethical behavior" (*Southern*). As with those proposals, Pfizer and its shareholders cannot determine with certainty what the Proponent is asking Pfizer to report on. For example, neither Pfizer nor its shareholders will know how to determine what constitutes "superior standards of care." Must the standards that Pfizer adopts in furtherance of the Proposal be "superior" in comparison to standards used in the past, standards used by Pfizer's peers or some other benchmark standard? The only guidance provided in the Proposal is the indication that these "superior standards" include "ensur[ing]. . . that animals' psychological, social and behavioral needs are met." But this phrase also is vague and indefinite. Who determines what each animal's basic "psychological, social and behavioral needs" are; when are those standards tested; and how would Pfizer evaluate whether animals' needs are being satisfied? Pfizer and its shareholders (including the Proponent) may interpret the phrases "superior standards of care" and "animals' psychological, social and behavioral needs" to mean different things. Indeed, the range of reasonable interpretations of these phrases is so wide that it would be impossible for Pfizer and its shareholders to comprehend precisely what the Proposal entails.

In this particular context, the issue of what constitutes "superior standards of care" and "psychological, social and behavioral needs" is of critical importance to shareholders in evaluating the Proposal. The supporting statement does not clearly elaborate on these phrases, and instead focuses on the Proposal's request that Pfizer extend its Policy to contract laboratories and "ensuring [the adoption of] . . . *basic* animal welfare measures" (as opposed to "*superior* standards of care") (*emphasis added*). Rules 14a-8(i)(3) and (i)(6) impose an obligation on proponents to be clear as to the scope of their proposals. *See Dyer v. SEC*, 287 F.2d 773, 781 (8th Cir. 1961) ("it appears to us that the proposal, as drafted and submitted to the company, is so vague and indefinite as to make it impossible for either the board of directors or the shareholders at large to comprehend precisely what the proposal would entail.").

As with the proposals in *Int'l Business Machines Corp.*, *Alcoa* and *The Southern Co.*, given the ambiguities contained in the Proposal, it is unclear what additional disclosures shareholders voting for the Proposal would expect of Pfizer and what actions Pfizer would be required to take if the Proposal were to be implemented. Thus, the Proposal is excludable under Rule 14a-8(i)(3) as misleading because neither the shareholders voting on the proposal, nor Pfizer in implementing the proposal (if adopted), would be able to determine with any reasonable certainty what actions or measures the proposal requires. For the same reason, the Proposal also may be properly excluded pursuant to Rule 14a-8(i)(6) since it is vague and ambiguous, with the result that Pfizer "would lack the power to implement" the Proposal.

II. The Proposal Is Beyond Pfizer's Power To Implement And Thus May Be Excluded Under Rule 14a-8(i)(6).

A company may exclude a shareholder proposal under Rule 14a-8(i)(6) “[i]f the company would lack the power or authority to implement the proposal.” Pfizer believes that the Proposal is excludable under Rule 14a-8(i)(6) because it is impossible for Pfizer to “ensure that animals’ psychological, social and behavioral needs are met.” Moreover, as discussed below, the Proponent’s own publications indicate their belief that it is “almost always an impossible goal” to “reduce or eliminate” stress on certain animals, meaning that the Proponent acknowledges it is impossible to implement the Proposal.

The Staff has concurred that shareholder proposals are excludable under Rule 14a-8(i)(6) where a company cannot ensure that a variety of actions would occur. *See, e.g., H.J. Heinz Co.* (avail. Jun. 14, 2004) (proposal urging the Board to amend the bylaws to require that an independent director who has not served as an officer of the company serve as the Chairman of the Board excludable because “it does not appear to be within the board’s power to ensure that an individual meeting the specified criteria would be elected as director and serve as chairman of the board”); *AT&T Corp.* (avail. Mar. 10, 2002) (proposal requesting adoption of an independent director bylaw, which would “apply to successor companies” excludable because “it does not appear to be within the board’s power to ensure that all successor companies adopt a bylaw like that requested by the proposal”); and *Putnam High Income Bond Fund* (avail. Apr. 6, 2001) (proposal requesting a reduction in the investment advisory fee and capping fund reimbursements to the adviser excludable because the fund did not have “the unilateral power” to implement either requirement). *See also* Staff Legal Bulletin No. 14C (June 28, 2005) (“we would agree with the argument that a board of directors lacks the power to ensure that its chairman or any other director will retain his or her independence at all times . . . when a proposal is drafted in a manner that would require a director to maintain his or her independence”).

Similarly, Pfizer lacks the power or authority to implement the Proposal. It is impossible for Pfizer to “ensure . . . that animals’ psychological, social and behavioral needs are met” (emphasis added) because the animals at issue cannot communicate to Pfizer that needs have or have not been satisfied. Moreover, the Proponent’s own publications acknowledge that it is impossible to “ensure that animals’ psychological, social and behavioral needs are met.” For example, the Proponent’s website states, “All animal experiments involve physical and/or psychological harm to the animals.” “Frequently Asked Questions” available at <http://www.marchofcrimes.com/faq.html> and attached hereto as Exhibit B. The Proponent’s website also acknowledges that it is “almost always an impossible goal” to “improve or modify . . . laboratory environments and procedures to reduce or eliminate unwanted stress in the lives of primates” in laboratories. *See* “Fear, Anxiety and Stress in the Laboratory: Why Nonhumans Primates Make Poor Research Subjects” available at <http://www.covancecruelty.com/pdfs/PrimatePaper.pdf#xml=http://www.petasearch.org/texis/search/pdfhi.txt?query=behavioral+psychological+&pr=default&prox=page&rorder=500&rprox=5>

[00&rdfreq=500&rwfreq=500&rlead=500&sufs=0&order=r&cq=&id=4326073748](#) and attached hereto as Exhibit C. Given that the Proponent acknowledges that “unwanted stress” cannot be reduced or eliminated for animals in laboratory environments and given the Proposal’s request that Pfizer’s Policy “ensure . . . superior standards of care for animals who continue to be used for these purposes, both by the Company itself and by all independently retained laboratories, including provisions to ensure that animals’ psychological, social and behavioral needs are met,” it is beyond Pfizer’s power to implement the Proposal, just as it is beyond a company’s power to ensure that “an individual meeting the specified criteria would be elected as director and serve as chairman of the board” (as in *H.J. Heinz Co.*) or to “ensure that all successor companies adopt a bylaw like that requested by the proposal” (as in *AT&T Corp.*).

For these reasons, Pfizer believes the Proposal is excludable under Rule 14a-8(i)(6) as beyond Pfizer’s power to implement.

CONCLUSION

Based upon the foregoing analysis, Pfizer respectfully requests that the Staff of the Commission concur that it will take no action if Pfizer excludes the Proposal from its 2006 Proxy Materials. We would be happy to provide you with any additional information and answer any questions that you may have regarding this subject. Should you disagree with the conclusions set forth in this letter, we respectfully request the opportunity to confer with you prior to the determination of the Staff’s final position. If we can be of any further assistance in this matter, please do not hesitate to call me at (212) 733-4802.

Very truly yours,


Margaret M. Foran EAI

Enclosures

cc: Leana Stormont, Esq., People for the Ethical Treatment of Animals

Exhibit A

November 1, 2005

Margaret M. Foran
Secretary, Pfizer Inc.
235 East 42nd St.
New York, NY 10017-5755



Re: Shareholder Proposal for Inclusion in the 2006 Proxy Materials

Dear Ms. Foran:

Attached to this letter is a Shareholder Proposal submitted for inclusion in the proxy statement for the 2006 annual meeting. Also enclosed is a letter from our brokerage firm certifying to our ownership of stock. We have held these shares continuously for more than one year and intend to hold them through and including the date of the 2006 annual meeting of shareholders.

Please communicate with our designated representative, Leana Stormont, if you need any further information. If the Company will attempt to exclude any portion of my proposal under Rule 14a-8, please so advise my representative within 14 days of your receipt of this proposal. Ms. Stormont may be reached at:

Leana Stormont, J.D.
Research & Investigations Department
People for the Ethical Treatment of Animals
501 Front St.
Norfolk, VA 23510

757.962.8327 (phone)
757.628.0781 (fax)
leanas@peta.org

Thank you for your time and attention in this matter.

Very truly yours,


Frank Randall


Joann Randall

Enclosures
cc: Leana Stormont

November 1, 2005

Margaret M. Foran
Secretary, Pfizer Inc.
235 East 42nd St.
New York, NY 10017-5755

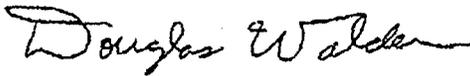
Re: Shareholder Proposal for Inclusion in the 2006 Proxy Materials

Dear Ms. Foran:

This firm is the record holder of 1,500,000 shares of Pfizer common stock held on behalf of our clients, Frank and Joann Randall. Our clients have held these shares continuously and without interruption for more than one year prior to the filing deadline. Our clients intend to continue holding these shares through the date of the 2006 annual meeting.

If you have any further questions, please do not hesitate to contact me.

Thank you.



Douglas Walden
Charles Schwab

PFIZER SHAREHOLDER RESOLUTION

This Proposal is submitted by Frank and Joann Randall.

WHEREAS, the Company conducts tests on animals as part of its product research and development; and

WHEREAS, the Company also retains independent laboratories to conduct tests on animals as part of product research and development; and

WHEREAS, abuses in independent laboratories have recently been revealed and disclosed by the media; and

WHEREAS, the Company has a *Laboratory Animal Care and Use* policy posted on its website as part of its commitment to Corporate Responsibility;

NOW THEREFORE, BE IT RESOLVED, that the shareholders request that the Board issue a report to shareholders on the feasibility of amending the Company's *Laboratory Animal Care and Use* policy to ensure (a) that it extends to all contract laboratories and that it is reviewed with such outside laboratories on a regular basis, and (b) superior standards of care for animals who continue to be used for these purposes, both by the Company itself and by all independently retained laboratories, including provisions to ensure that animals' psychological, social and behavioral needs are met. Further, the shareholders request that the Board issue an annual report to shareholders on the extent to which in-house and contract laboratories are adhering to this policy, including the implementation of the psychological enrichment measures.

Supporting Statement:

A number of pharmaceutical companies have adopted and prominently published animal welfare policies on their websites relating to the care of animals used in product research and

development. The Company has a published policy committed to approaching “all research involving animals with the highest level of humane concern ...”¹

However, the recent disclosure of atrocities recorded at Covance, Inc. has made the need for a formalized, publicly available animal welfare policy that extends to all outside contractors all the more relevant, indeed urgent. Filmed footage showed primates being subjected to such gross physical abuses and psychological torments that Covance sued to stop PETA Europe from publicizing it. The Honorable Judge Peter Langan, in the United Kingdom, who denied Covance’s petition, stated in his decision that the video was “highly disturbing” and that just two aspects of it, namely the “rough manner in which animals are handled and the bleakness of the surroundings in which they are kept ... even to a viewer with no particular interest in animal welfare, at least cry out for explanation.”²

Shareholders cannot monitor what goes on behind the closed doors of the animal testing laboratories, so the Company must. Accordingly, we urge the Board to commit to ensuring that basic animal welfare measures are an integral part of our Company’s corporate stewardship.

We urge shareholders to support this Resolution.

¹ http://www.pfizer.com/pfizer/are/about_public/mn_about_laboratory_use.jsp

² The case captioned *Covance Laboratories Limited v. PETA Europe Limited* was filed in the High Court of Justice, Chancery Division, Leeds District Registry, Claim No. 5C-00295. In addition to ruling in PETA’s favor, the Court ordered Covance to pay PETA £50,000 in costs and fees.

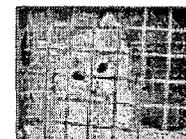
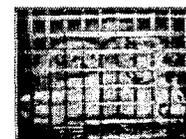
Exhibit B



Frequently Asked Questions

Does the March of Dimes really fund horrific animal experiments?

Sadly, yes, though the charity is tight-lipped about it! The March of Dimes has funneled millions of dollars into animal experiments. March of Dimes-funded experimenters have: sewn shut newborn kittens' eyes, left them blind for a year, and then killed them; cut organs from pigs and stitched them into primates; and addicted pregnant animals to alcohol, nicotine and cocaine. In one study (results published in 1998), experimenters cut into the abdomens of pregnant sheep and destroyed the ear drums of the unborn lambs. Just before birth, the mother sheep and lambs were killed, and the brains were cut from the lambs to be examined.



The March of Dimes "only" uses mice and rats, doesn't it?

March of Dimes has funded experiments using pigs, sheep, dogs, hamsters, rabbits, rats, cats, opossums, birds, primates, and other animals, and has made it clear that it will fund experiments on any species it chooses. However, even if March of Dimes experimented on mice and rats exclusively, it would still be wrong. Rats and mice feel pain every bit as much as cats or dogs—and as much as you or I.



Is there evidence of poor treatment of animals in March of Dimes funded experiments?

All animal experiments involve physical and/or psychological harm to the animals. But, disturbingly, primates in experiments funded by the March of Dimes have died due to the absence of an anesthesiologist during surgery, lack of adequate monitoring after surgery, and from "technical problems." March of Dimes funded experimenters have also restrained monkeys in chairs for many days at a time, sewn cats' eyes shut, and damaged the brains of ferrets and other animals.



Don't animal protection laws prevent March of Dimes-funded experimenters from harming animals?

The Animal Welfare Act, which is the only law that protects animals in laboratories, deals only with housekeeping issues, such as cage size and transportation. Experimenters can do whatever they want to an animal—even perform painful, invasive experiments without anesthetics or painkillers. Unbelievably, government officials have chosen to interpret the Act to exclude mice and rats, so that the species that comprise 90 percent of all animals used in laboratories have no protections under the law! On top of these shocking facts, the Animal Welfare Act, even as weak as it is, is not adequately enforced.

Could the March of Dimes' animal experiments actually save human babies?

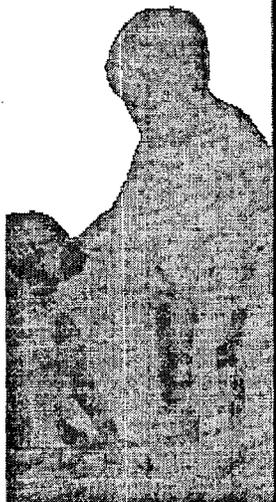
Birth defects are prevented and babies are saved when research dollars go to effective and relevant research, which comes from studying human problems and human babies, not from sewing kittens' eyes shut or addicting rats to cocaine. In fact, virtually all known developmental hazards have been identified through studies of human populations. The dangers of thalidomide, alcohol, methyl mercury, and lead, just to name a few, were all discovered by observing people, not animals.

Since the March of Dimes devotes only some of its resources to animal experiments, isn't there enough money to fund both animal experiments and other programs?

Every dollar that the March of Dimes wastes on cruel, useless animal experiments is a dollar not invested in programs that do work. Relying on faulty animal tests not only causes needless suffering for animals, it also puts human health in jeopardy. Animal experimentation also diverts millions of dollars from valuable human studies and research programs. For instance, a National Birth Defects Registry is desperately needed to uncover the root causes of birth defects; the largest registry in the United States, operated by the Centers for Disease Control, is so underfunded that it only collects limited information.

Improved prenatal care is desperately needed. Every year, 1.2 million women receive insufficient prenatal care, even though adequate care could prevent as much as 25 percent of all infant deaths. Help for pregnant women who smoke could decrease infant deaths by an estimated 10 percent. Alcohol abuse during pregnancy is the leading preventable cause of birth defects and mental retardation. Yet rats and other animals are injected with alcohol while women seeking help can't find it. Additionally, teenage pregnancies, AIDS, and drug abuse continue to be major threats to unborn children that require more resources than they currently receive.

**REAL HEROES
SAVE BOTH
THEIR LIVES!**



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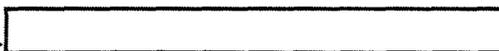


Exhibit C

Fear, Anxiety, and Stress in the Laboratory: Why Nonhuman Primates Make Poor Research Subjects

Mary Beth Sweetland, Director of Research & Investigations Department
Philip Schein, Special Assistant to the President
PETA, 501 Front Street, Norfolk, Virginia 23510
marybeths@peta.org

We have compiled the following executive brief for the convenience of IACUC personnel to help negotiate and summarize the recent literature on this subject. It indexes and appraises the recent studies on the causes and effects of stress on primates in laboratories, including the reasons these factors can never be eliminated or controlled. The brief is organized as follows:

1. Specific Laboratory Stressors of Primates

- 1.1. Housing and Social Stressors
- 1.2. Environmental Stressors
- 1.3. Husbandry Stressors
- 1.4. Protocol Stressors
- 1.5. Pre-Laboratory Stressors (When Applicable)
 - a. Prenatal and Early Rearing Sources of Stress
 - b. Capture and Transportation/Relocation Sources of Stress

2. Specific Effects of Laboratory Stressors in Primates

- 2.1. Biochemical, Physiological, and Epidemiological Effects
- 2.2. Behavioral and Social Effects
- 2.3. Psychological and Cognitive Effects

3. General Characteristics of Stress for Primates in Laboratories

- 3.1. Primates Do Not Habituate to Laboratory Stressors
- 3.2. Laboratories Cannot Eliminate Stressors
- 3.3. Primates Hide Symptoms of Stress, and Many Symptoms of Stress Are Difficult to Diagnose and Detect
- 3.4. The Effects of Stress in Primates Are Complex and Interact
- 3.5. Stress Affects Individual Primates Uniquely
- 3.6. Stress Variables Cannot Reliably Be Controlled, Factored, or Generalized
- 3.7. Cross-Species Misconceptions

4. Recommendations

5. Works Cited and Bibliographic Resources

1. Specific Laboratory Stressors of Primates

1.1 Housing and Social Stressors

Laboratory cages are physically confining and socially restrictive living spaces for primates, and these conditions impose unreasonable stresses upon them. Recent studies have confirmed the causes and effects of housing and social stressors on primates, including primates who are subjected to solitary lives in cages or those who are housed in cramped, crowded conditions. Other studies have shown the harmful consequences of separating primates from their cage mates and placing them together arbitrarily into new groups, altering power dynamics and systems of social support. In all these cases, imposing unnatural physical and social configurations on primates resulted in profound disruptions of species-specific behavior and physiological issues.^{1,2,3,4,5,6,7,8,9,10,11}

- Cross, Pines, and Rogers (2004) and Soltis, Wegner, and Newman (2003), for example, demonstrated that both the presence of conspecifics or separation from conspecifics can be causes of acute stress.^{12,13}
- Shapiro *et al.* (2000) and Reinhardt and Rossel (2001) documented how individual caging constitutes such a potent stressor as to produce immunosuppression.^{14,15}
- Chase *et al.* (2000) and Bellanca and Crockett (2001) demonstrated that singly housed, socially restricted primates paced more, locomoted significantly less, were more aggressive, and manifested significantly more abnormal behaviors.^{16,17}
- Boyce *et al.* (1998) noted that when confinement space is reduced, the crowded conditions result in a five-fold increase over six months in the incidence of violent injuries.¹⁸
- Cross, Pines, and Rogers (2004) documented how separating animals with social bonds stimulates a response consisting of behavioral agitation and adrenal activity, and Pines, Kaplan, and Rogers (2004) demonstrated how marmosets are negatively affected by any events adversely affecting a roommate.^{19,20}
- Crockett *et al.* (2000) and Reinhardt (2000) demonstrated that even subtle changes in conditions of captivity such as different cage sizes and cage levels can be extremely stressful to primates.^{21,22}

1.2 Environmental Stressors

Laboratory environments differ enormously from natural habitats, and recent studies have demonstrated that several of a laboratory's environmental conditions contribute to unacceptable levels of stress in primates, including ambient temperature, lighting conditions, loud noises, cage locations, and even the mere presence of humans in primate rooms. Although some laboratories have been able to make some small modifications in the environmental conditions of their laboratories, it is not possible for primates to live in

laboratories and participate in experiments without suffering from environmental stress.^{23,24,25,26,27,28,29,30,31,32,33,34,35}

- Reinhardt and Reinhardt (2000a) demonstrated that poor lighting in laboratories frequently provides a cave-like housing environment for primates, particularly for those who are forced to live ground-dwelling lifestyles in bottom-tier cages. Reinhardt concludes that these conditions impair well-being and invalidate research data.³⁶
- Cross, Pines, and Rogers (2004) documented how noise adversely affects primates in laboratories. Their mean levels of salivary cortisol during periods of disturbance were four times higher than normal.³⁷
- Reinhardt and Reinhardt (2000b) recorded that primates exhibit apprehension and fear when an investigator or technician even enters the room.³⁸

1.3 Husbandry Stressors

Primates in laboratories are subjected to a variety of routine animal husbandry procedures, all of which are experienced as stressful even when a laboratory follows best practices. The most sensitively conducted non-invasive and non-experimental procedures can create stressful conditions in captive primates. A study by Balcombe (2004) on the effects of routine husbandry on rats concluded that non-invasive manipulation occurring as part of routine husbandry, including lifting an animal, cleaning or moving an animal's cage, etc., resulted in "significant changes in physiologic parameters correlated with stress (e.g., serum or plasma concentrations of corticosterone, glucose, growth hormone or prolactin, heart rate, blood pressure, and behavior."³⁹ The effects on primates are that much more complex and profound. For example:

- Carstens and Moberg (2000) cautioned, "What might be viewed as innocuous manipulation of the animal may confound experimental results," and Wolfe (2000) confirmed that stress results from "both experimental and non-experimental sources."^{40,41}
- Suzuki (2002) documented how plasma cortisol levels increased when a large adult male researcher entered the room, as macaques instinctively assumed the researcher to be a predator or rival.⁴²
- Line *et al.* (1989) demonstrated that primates become significantly stressed when their room or cages are cleaned or they are tested for tuberculosis. Heart rates can remain elevated for hours after these events, and primates do not habituate to them.⁴³

Capture is especially stressful for primates, and they frequently reveal their distress in obvious ways such as crouching, assuming defensive postures, diarrhea, fear grinning, attempting to flee, grimacing, suffering from rectal prolapse, screaming, struggling, or

making aggressive displays. Primates are frequently restrained and captured in laboratories, and they always experience restraint as stressful regardless of the method used. Common methods of restraint and studies that have demonstrated their stressful effects include anesthetics such as ketamine, board restraints, chair restraints, chute restraints, guillotine panels, manual restraint, squeeze cages, table restraints, tethering, and transfer boxes. In addition to capture and restraint, recent studies have demonstrated that primates are also significantly stressed by other routine husbandry procedures such as feeding, medical procedures, palpation, pregnancy examinations, and weighing.^{44,45,46,47,48,49,50,51,52,53,54,55,56,57}

1.4 Protocol Stressors

All research protocols are stressful to primates, even those that are not specifically designed to produce stress. Most of these involve at least some of the following standard components which multiple studies have proved produce stress and skew data: behavioral testing, blood sampling, novel situations and environmental manipulation, stool sampling, reproduction techniques such as penile vibratory stimulation or electroejaculation, venipuncture, and saliva or urine sampling.^{58,59,60,61,62,63,64,65,66,67,68,69,70,71,72,73,74,75}

- McAllister (2004) and Reinhardt and Reinhardt (2000) documented how using cortisol levels as a measure of stress are complicated by the use of invasive techniques that may increase hypothalamic-pituitary-adrenal HPA axis activity during sample collection.^{76,77}
- Yeoman (1998) and Cui (1996) demonstrated the detrimental effects of stress on sperm yield and quality on samples collected through the highly stressful and painful method of electroejaculation.^{78,79}

1.5 Pre-laboratory Stressors (When Applicable)

The effects of stress are persistent and may have begun before a primate enters a laboratory. These unknown variables, which may have already altered physiology and behavior as well as receptivity to new procedures, further complicate attempts at establishing reliable controls.

a) Prenatal and Early Rearing Sources of Stress

- Gorman and Coplan (2002) and Clarke *et al.* (2004) demonstrated that prenatal stress can produce profound alterations in biological factors such as regulation of hypothalamic-pituitary-adrenal (HPA) axis, biogenic amines, and immune function. Coe (2003) confirmed that the prenatal environment can alter behavior, dysregulate neuroendocrine systems, and affect the hippocampal structures in primates in a persistent manner.^{80, 81, 82}

- Barr *et al.* (2003) and Lutz *et al.* (2003) documented that macaques with histories of early-life stress have also have exhibited impulsive aggression, incompetent social behavior, and increased behavioral and endocrine responsivity to stress. Tiefenbacher (2005) demonstrated that chances of primates developing self-injurious behavior is heightened by adverse early experiences and subsequent stress exposure.^{83,84,85}

b) Capture and Transportation/Relocation Sources of Stress

- Laudenslager *et al.* (1999) described the magnitude of stress associated with original capture, noting that during the period of captivity, plasma cortisol rose, plasma prolactin and growth hormone fell, and there was a significant rise in insulin.⁸⁶
- Honess, Johnson, and Wolfensohn (2004) documented the stress caused by air transport and re-housing and reported that the behavioral changes which occurred never returned to levels at the original breeding facility within the first month, an experience that “may result in the compromising of the welfare of the study animals.”⁸⁷

2. Specific Effects of Laboratory Stressors in Primates

2.1 Biochemical, Physiological, and Epidemiological Effects

There is a wealth of information detailing the extent to which stress disrupts the major physical functions of primates and leads to the development of disease and other pathologies.

- Carstens and Moberg (2000), for example, report that the cumulative effects of several stressors on primates leads to diversion of resources that results in their suffering from immune incompetence and other pathologies such as loss of reproductive abilities.⁸⁸

Laboratory stress in primates affects the biochemistry of their endocrine, immune, and reproductive systems. The endocrine system is the adrenal gland, including the cortex and the medulla, adrenal hormones, including adrenal androgens, cortisol, adrenal corticoids, corticosteroids, and glucocorticoids. It also includes the pituitary gland and its hormones, including trophic hormones, the pituitary-adrenocortical-hypothalamic system, thyroid gland hormones, catecholamines, luteinizing hormones, lymphoids, prolactin, and opiate hormones.^{89,90,91,92,93,94,95,96,97,98,99,100}

Stress affects the immune system of primates in laboratories by altering general antibody responses, the character of lymphocytes—including B cells, CD4+ cells, CD8+ cells, and T cells—cytokine, interferon, hematocrit, hemoglobin, monocytes, natural killer cell (NK) activity, prostaglandins, and white blood cells.^{101,102,103,104,105,106,107,108,109,110}

The reproductive system undergoes general changes as well. The organs affected are the pituitary-gonadal hormones, ovaries, placenta, the follicular phase and luteal phase of menstruation, testosterone, dihydrotestosterone, progesterone, pregnenolone, 17-hydroxypregnenolone, 17-hydroxyprogesterone, 20a-dihydroprogesterone, estrone, estradiol, DHA and DHAS, semen volume, and motility.^{111,112,113,114,115,116,117,118,119,120}

The known physiological effects of stress in primates in laboratories include arteriosclerosis, osteoporosis, diabetes, changes in blood pressure, body temperature, circadian rhythms, ECG patterns, enzymatic shifts, heart rate, leukocytosis, metabolism, respiratory rates, sleep patterns, and weight gain or loss.^{121,122,123,124,125,126,127,128,129,130,131,132,133,134,135}

- Gilmer and McKinney (2003) reported that the physiological effects of stress in primates included an altered hypothalamic-pituitary-adrenal response to stress, changes in diurnal temperature regulation, and alteration in immune function; Schapiro (2000) documented how diminished immune response is the most frequently observed consequence of prolonged or intense stress exposure.^{136,137}
- Fuchs and Flugge (2004) documented how one month of stress reduced cell proliferation in the dentate gyrus and decreased the total hippocampal volume. . . . Stress also induced a constant hyperactivity of the hypothalamic-pituitary-adrenal axis and suppressed both motor and marking behaviors.¹³⁸

These biochemical effects also make primates more susceptible to diseases, including bacterial infections, neutrophilia, parasitic infestations, and viral infections as well as doubling the possibility of endometrial cancer. Shivley (2004) and Boere *et al.* (2003) documented additional stress-induced pathologies such as higher incidences of diabetes, consumptive disorders, osteoporosis, arteriosclerosis, and gastric-duodenal ulcers. Bailey (2004) recorded how even prenatal stress altered bacterial colonization.^{139,140,141,142,143,144}

- Shively (1999) concluded from studies of monkeys that social stress caused by low social status may be the underlying mechanism affecting pathophysiology and disease.¹⁴⁵

2.2 Behavioral and Social Effects

The myriad behavioral abnormalities that characterize primates in laboratories have been well known for decades and include bizarre postures such as floating limbs, self-biting, self-clasping, self-grasping, and saluting; stereotyped motor acts such as pacing, head-tossing, head-weaving, bouncing in place, somersaulting, and rocking; appetite disorders such as uncontrollable eating, insufficient eating, frequent drinking, feces-eating, and paint-eating; sexual disorders such as inappropriate orientation, homosexual behavior, sexual dysfunction, and autoerotic stimulation; disturbed activity patterns such as inactivity, hyperactivity, and temporally inappropriate behavior; and agonistic disorders such as hyper-aggressiveness, fear-grinning, screaming, acute diarrhea, struggling and

refusing to enter the squeeze cage; and self-abusive behavior such as self-biting, hair pulling, and self-scratching leading to physical harm.^{146,147,148,149}

- Gilmer and McKinney (2003) demonstrated that early adverse experiences in primates can lead to behaviors including repetitive idiosyncratic behavior, increased self-directed behaviors, inappropriate expressions of aggressive behavior, nonmodulated patterns of consumption, and inappropriate sexual and maternal behavior.¹⁵⁰
- Reinhardt and Rossel (2001) and The National Research Council (1998) documented how self-biting typically occurs in individually caged primates.^{151,152}

2.3 Psychological and Cognitive Effects

Many of the social and behavioral effects of stress in captive primates have already been discussed in previous sections of this brief, and additional studies also illustrate its ill effects on primate psychology and cognitive functioning. These effects include degradations in their ability to engage in species-typical activities such as exercising, mating, raising children, maintaining mental well-being, engaging in normal forms of social companionship, performing routine tasks, and the ability to recognize predators.^{153,154,155,156,157,158,159,160,161,162,163,164}

- Shivley (2005) documented how female cynomolgus monkeys suffered from signs of depression when they were isolated and exhibited lethargy, hormone disruptions, and higher heart rates—all of which are indicative of depression.¹⁶⁵
- Gilmer and McKinney (2003) documented how early adverse experiences affected primates cognitively, resulting in such animals' requiring longer habituation time for any task. Arnsten and Goldman-Rakic (1998) and Moghaddam and Jackson (2004) demonstrated that noise stress impairs prefrontal cortical cognitive function in monkeys.^{166,167,168}

3. General Characteristics of Stress for Primates in Laboratories

3.1 Primates Do Not Habituate to Laboratory Stressors

Experimenters frequently claim that primates in laboratories habituate to stress after a period of acclimatization, but this is untrue. Several recent studies have demonstrated that primates do not habituate to many stressors, even after years of exposure.^{169,170,171,172,173,174,175,176,177}

Consider the following:

- Schnell *et al.* (1997) argued that it is impossible to completely inhibit the defensive reactions of primates to experimental procedures—even after long-term training. He demonstrated that primates in laboratories respond to restraint and venipuncture with marked, acute, and chronic increases in their heart rate and blood pressure even after years of experience as research subjects. Moreover, experienced primate research subjects have learned to anticipate restraint and venipuncture events by developing sustained patterns of cardiovascular stress.¹⁷⁸
- Line *et al.* (1989) demonstrated that primates do not habituate to the stressors of room cleaning, cage cleaning, or tuberculosis testing. Line *et al.* documented how they became significantly stressed when their rooms or cages were cleaned or when they were tested for tuberculosis. Heart rates remained elevated for hours after these events, and primates did not habituate to them.¹⁷⁹
- Gordon *et al.* (1992) demonstrated that experimentally naïve primates do not habituate to blood sampling procedures even after six weeks of exposure.¹⁸⁰
- Honess, Johnson, and Wolfensohn (2004) reported that levels of stress a month after relocation from a breeding facility never returned to normal.¹⁸¹
- Lilly *et al.* (1999) demonstrated that primates did not acclimate to new housing situations even after 23 weeks in a new situation.¹⁸²
- Golub and Anderson (1986) found that primates never adapted physiologically to the stresses of weekly blood sampling and manual palpation, even though they may have adapted behaviorally. Heart rate, blood pressure, respiration rate, and cortisol levels always rose during these procedures, even in primates who have experienced these procedures for 23 weeks.¹⁸³
- Laudenslager *et al.* (1985) discussed how primates who are forced to endure separation experiences from their mothers or troop members frequently suffer from abnormal heart rates, body temperatures, circadian rhythms, EEG patterns, cellular immune function, and behavioral and neurological pathologies more than three years after the separation event. These changes persist for several years after the separation experience and may be permanent for some primates.¹⁸⁴

3.2 Laboratories Cannot Eliminate Stressors

Sometimes experimenters and laboratory staff believe that they can improve or modify their laboratory environments and procedures to reduce or eliminate unwanted stress in the lives of the primates under their care. But this is almost always an impossible goal, even in the best of primate sanctuaries. Primates are simply too sensitive to stress, and laboratory environments are inherently too stressful for primates to live in them without suffering the unnatural and data-contaminating condition of ceaseless stress.

- Barros and Tomaz (2002) and Tatoyan and Cherkovich (1972) demonstrated that the mere presence of a human observer is capable of eliciting defensive attack and anxiety-related behavior. In many cases, the presence of human beings is even more stressful to primates than being restrained.^{185,186}
- Schapiro *et al.* (2000) demonstrated that every type of laboratory housing for primates degrades the effectiveness of at least some components of their immune systems.¹⁸⁷

3.3 Primates Hide Symptoms of Stress, and Many Symptoms of Stress Are Difficult to Diagnose and Detect

It is widely documented that primates not only hide symptoms of stress as defensive measures, but that symptoms of stress may be indiscernible or invisible to the investigator. Many primates in laboratories may look fine, but inwardly they are suffering from the damaging effects of stress in their biochemistry, physiology, psychology, and sociability. Usually only the most extreme forms of fear, pain, or suffering will cause primates to show the visible effects of their distress.^{188,189,190}

- Coe *et al.* (1987) demonstrated that primates who are separated from their troops suffer from diminished immune system response, even though they do not appear debilitated or depressed. Coe concluded that it is not possible to visually identify the effects of diminished immune system response in primates that are suffering from separation experiences.¹⁹¹

Making diagnoses of stress more problematic is that the primate subject may also not be conscious of the physical effects of stress:

- For example, Carstens and Moberg (2000) discussed “stress-induced analgesia” and how psychological distress in primates can increase or decrease pain perception.¹⁹²

Carstens and Moberg discussed as well how a tumor, for example, may elicit stress responses in an animal not conscious of the cancer. In a laboratory setting, such induced physiological pathologies are often an integral component, and many symptoms may not even be recognized as stress or be attributed to stress, as they may be the product of complex, interacting, and ambiguous physiological origins.

3.4 The Effects of Stress in Primates Are Complex and Interact

Stress is a complicated phenomenon, affecting multiple, interconnected systems, so that it is difficult to isolate as a single variable or effect. Primates react to stress in highly individualized and complex ways, especially at the biochemical level where the sympathetic nervous system, the hormonal systems, and the immune systems all interact

with each other in response to stressful conditions. The complexity of these responses means that experimenters are frequently unable to know if the data that they collect reflect the results of the experimental procedures or the stressed condition of the primate in the laboratory. The results, therefore, are ambiguous because experimenters cannot reliably identify the causes of the effects they measure. Included in this brief are indexed dozens of studies that demonstrate this fact. But a few studies deserve special mention because they have examined the complex reality of stress in primates directly:

- Norcross and Newman (1999) identified that stress “can differentially affect the hormonal response without differentially affecting the behavioral [response].”¹⁹³
- Carstens and Moberg (2000) stated that the most reasonable strategy for measuring stress would be to monitor the responses of the four major defense systems (behavior, autonomic nervous system, neuroendocrine system, and immune system) since they are responsible for the biological changes that occur during stress; however, they argued that none of the monitoring has proved to be a reliable measure of stress or *distress* since no single system responds to all stressors.¹⁹⁴
- Shively (2005) described depression in primates as a “whole-body disorder.”¹⁹⁵
- Schapiro *et al.* (2000) demonstrated that even though stress indexes in primates are usually measured singly for purposes of experimental clarity, the actual biochemical realities of stress in primates are extremely complicated. Every single measurable stress effect interacts with all of the others, making it impossible to limit the biochemical and physiological effects of stress to only a few biological systems.¹⁹⁶
- Goncharov *et al.* (1979) demonstrated that stressors evoked not just a few, initial hormone responses, but generally elicited a broad range of multiple, concurrent responses involving much of the neurological and endocrine systems.¹⁹⁷
- Coe *et al.* (1987) demonstrated that the endocrine and immune systems of primates in laboratories do not change in simple ways in response to stress and concluded that we must not underestimate the true complexity of the total effects that stress has on them.¹⁹⁸

3.5 Stress Affects Individual Primates Uniquely

Stress is a highly variable phenomenon affecting individual primates in unique ways and making statistically reliable data problematic.

- Carstens and Moberg (2000), for example, stated that because there is currently no litmus test for distress, trying to recognize distress must be done on almost a case-by-case basis. They added the caveat that the same stressor can be manifested in a variety of responses in the same animal.¹⁹⁹

Further complicating stress measurements are the intra-animal differences in how the four general defense systems respond in attempting to cope with the stressor. Early experience, genetics, age, and physiological state are examples of a multitude of moderators that influence the nature of a stress response. With traditional laboratory animals such as rodents, many of these variables can be more easily controlled and accounted for in the experimental design, but for some laboratory animals (e.g. nonhuman primates or random-source animals), it is extremely difficult to account for these modulators of the stress response because simple measures of hormones, autonomic nervous system activity, or immune response may be unreliable measures of stress outside the experimental paradigm.

- Gust *et al.* (1994) demonstrated that the biochemical reactions of individual primates to social stressors vary widely. Gust concluded that because social stressors are one of the most common and upsetting forms of stress among primates housed in laboratories, the large effects of social stress and the wide variability in responsiveness among individuals make it difficult to interpret experimental data derived from them.²⁰⁰
- Sapolsky (2001, 1993) demonstrated how stress affects primates uniquely and how primates respond to stress in highly individualized ways.^{201, 202}

3.6 Stress Variables Cannot Reliably Be Controlled, Factored, or Generalized

The scientific integrity of studies involving laboratory-confined primates is inherently compromised because of the pervasive contamination of stress and the impossibility of accurately defining and controlling the spectrum of causes and effects of stress. (Bentson *et al.* 2003).²⁰³

- Moberg (1999) argued that not only can pain and stress cause distress, the biologic effects can also compromise experimental results. Carstens and Moberg (2000) further cautioned that there are neither “agreed-upon definitions” for terms such as pain and stress nor are there absolute, objective measures because animals cannot verbalize what they are experiencing.^{204, 205}
- Hawkins (2003) reported that indicators of pain, suffering, and distress in primates are largely subjective.²⁰⁶
- Reinhardt (2004) concluded that there is no control over the time during which an environmental disturbance is occurring, a factor that must be mentioned to explain possible incongruities of data.²⁰⁷

- Schnell *et al.* (1997) demonstrated that the acute effects of stress in primates have broad implications for the evaluation of pharmacological profiles of drugs used in biomedical research.²⁰⁸

3.7 Cross-Species Misconceptions

Despite overwhelming evidence, there are still researchers who do not recognize the significance of stress factors in research on primates.

According to Haller (DD 2001), "There is an important discrepancy between animal models of anxiety and human anxiety patients: While experimental animals are usually unstressed, patients usually have a long history of stress."²⁰⁹

However, an equivalent mistake is the assumption that stress research on primate models can be meaningfully extrapolated to humans. Just as pharmacological efficacy has great variation between nonhuman and human primates, the experimental data obtained from nonhuman primates have little generalizability beyond the simple, tautological recognition that induced stressors cause symptoms of stress.

4. Recommendations

Laboratories are stressful environments, and the primates who are held within them endure lives of ceaseless anxiety, pain, and fear. Some laboratories are more stressful than others, but no laboratory can reduce the stresses that primates experience significantly enough to raise animal-welfare conditions to an acceptable level, and no laboratory can reduce the stressors sufficiently to produce meaningful and reliable scientific data. Clearly disturbing experiments such as those conducted at Columbia University have little scientific import and egregious ethical consequences. In these studies, monkeys had metal pipes surgically implanted into their skulls for the sole purpose of inducing stress in order to study the connection between stress and women's menstrual cycles. We urge all IACUCs and affiliated institutions not to accept or approve further protocols involving primates in laboratories.²¹⁰

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December 30, 2005

2006 JAN -4 PM 2: 39

BY REGULAR & ELECTRONIC MAIL: cfletters@sec.gov OF CHIEF COUNSEL
CORPORATION FINANCE

Office of the Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F. Street, N.W.
Washington, D.C. 20549

Re: Shareholder Proposal of Frank and Joann Randall for Inclusion in the
2006 Proxy Statement of Pfizer Inc.

Ladies and Gentlemen:

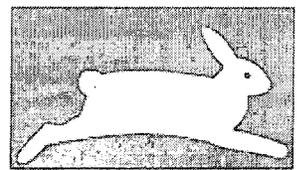
This letter is filed in response to a letter dated December 16, 2005, submitted to the SEC by Pfizer Inc. ("Pfizer" or "the Company"). The Company seeks to exclude a shareholder proposal submitted by Frank and Joann Randall, supporting members of People for the Ethical Treatment of Animals ("PETA"). Mr. and Mrs. Randall have named the undersigned as their designated representative. Pfizer asserts that the proposal should be omitted based on Rule 14a-8(i)(3) as vague and indefinite, and based on Rule 14a-8(i)(6) as beyond the Company's ability to implement. As of this date, the Company's no action letter is virtually identical to the no action letters submitted by General Electric and Bristol-Myers Squibb in opposition to the same resolution filed by PETA with those companies.

For the reasons which follow, the proponents request that the SEC recommend enforcement action if the proposal is omitted.

The resolution under review is very straightforward:

[T]he shareholders request that the Board issue a report to shareholders on the feasibility of amending the Company's *Laboratory Animal Care and Use* policy¹ to ensure (a) that it extends to all contract laboratories and that it is reviewed with such outside laboratories on a regular basis, and (b) superior standards of care for animals who continue to be used for these purposes, both by the Company itself and by all independently retained laboratories, including provisions to ensure that animals' psychological, social and behavioral needs are met. Further, the shareholders request that the Board issue an annual report to shareholders on the extent to which in-house and contract laboratories are adhering to this policy, including the implementation of the psychological enrichment measures.

¹ The *Laboratory Animal Care and Use* policy is posted on Pfizer's Web site at http://www.pfizer.com/pfizer/are/about_public/mn_about_laboratory_use.jsp.

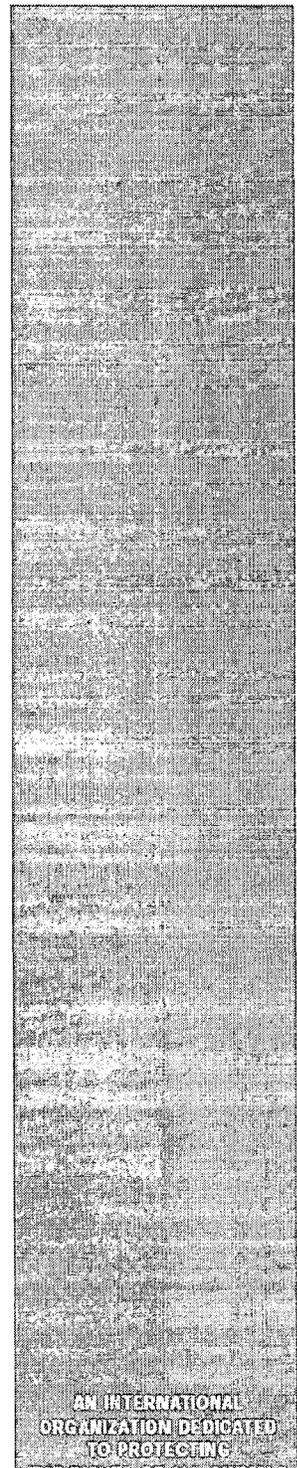


PETA

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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In short, Pfizer is being asked simply to report to shareholders on the feasibility of extending its animal welfare policy to outside contractors, and on the feasibility of implementing enrichment measures for the animals used in the Company's laboratories and outside facilities.

I. The Proposal Is Not Vague and Indefinite Under Rules 14a-8(i)(3) and 8(i)(6).

The Company argues that it cannot ensure "superior standards of care" for animals used in its laboratories, nor can it ensure that their "psychological, social and behavioral needs are met." In fact, Pfizer declares that neither the Company nor its shareholders "will know how to determine what constitutes 'superior standards of care.'" (No Action Letter, p. 4.)

The Company's position hinges on both Pfizer's inability to "ensure" anything in attempting to attain high standards of animal care and welfare, and even more basically, its powerlessness to recognize or define what constitutes high standards of care. It is difficult to imagine why Pfizer cannot ensure superior standards of care or implement enrichment measures in light of the Company's current *Laboratory Animal Care and Use* policy. That Policy includes the following commitments:

- "[T]he highest level of humane concern for [laboratory] animals."
- "[A]nimals under our care will be attended to meticulously."
- [Pfizer will] maintain the ***highest possible standards*** of laboratory animal care and use."
- The Company will provide "***superior veterinary care.***" (*Animal Welfare* policy at <http://compliance.pfizer.com>.)

Based on the Company's own statements, Pfizer is fully acquainted with *high standards* of care and even *superior standards* of veterinary care, for animals used in laboratory testing. The above-quoted statements belie Pfizer's claim that the shareholder proposal is vague and indefinite because any contrary interpretation renders the Company's *Laboratory Animal Care and Use* policy a nullity.

Likewise, Pfizer asserts that providing for animals' psychological, social, and behavioral needs is similarly "vague and indefinite," and therefore an unattainable end. Frankly, we credit the Company with having the sophistication and resources to easily achieve those objectives. There is a significant body of literature which provides guidance on enrichment measures for animals in laboratories. We are confident that a large pharmaceutical company like Pfizer can readily access and discern how to provide for such needs. We have footnoted some source materials to aid them.²

² CCAC Policy on the "Social and Behavioral Requirements of Experimental Animals"
http://www.ccac.ca/en/CCAC_Programs/Guidelines_Policies/POLICIES/SABREA.HTM
CCAC Guidelines (see 1984 and 1993 Guide)
http://www.ccac.ca/en/CCAC_Programs/Guidelines_Policies/GDLINES/Guidelis.htm

USDA Guidance on "Environmental Enrichment in Rodents"
<http://www.nal.usda.gov/awic/pubs/enrich/rodents.htm>
Contemporary Topics in Laboratory Animal Welfare Science
http://www.ncbi.nlm.nih.gov/entrez/query.fcgi?cmd=Retrieve&db=PubMed&list_uids=15669134&dopt=Citation
Olsson AS, Dahlborn K. 2002. Improving housing conditions for laboratory mice: a review of 'environmental enrichment.' *Laboratory Animals* 36: 243-270.

Jennings M, Batchelor GR, Brain PF, Dick A, Elliott H, Francis RJ, Hubrecht RC, Hurst JL, Morton DB, Peters AG, Raymond R, Sales GD, Sherwin CM, West C. 1998. Refining rodent husbandry: the mouse. *Laboratory Animals* 32: 233-259.

Patterson-Kane EG, Hunt DN, Harper. 1999. Behavioral indexes of poor welfare in laboratory rats. *Journal of Applied Animal Welfare Science* 2: 97-110.

The Staff's Legal Bulletin No. 14B (Sept. 15, 2004) was designed to rein in the flood of no action letters based on Rule 14a-8(i)(3). As the Staff noted "many companies have begun to assert deficiencies in virtually every line of a proposal's supporting statement as a means to justify exclusion of the proposal in its entirety." Unfortunately, the trend continues as we see here, with Pfizer parsing every word in order to eke out even the most tenuous bases to exclude the proposal from the 2006 proxy materials.

The Company's view that the resolution is excludable under Rules 14a-8(i)(3) and (6) is contradicted by Pfizer's current *Laboratory Animal Care and Use* policy. Reporting to shareholders on the feasibility of amending the Company's policy to add certain identifiable improvements does not fall within any of the SEC exceptions.

II. The Proposal Is Not Beyond Pfizer's Power to Implement

The Company states that the resolution is excludable because it is impossible for Pfizer to "ensure that animals' psychological, social, and behavioral needs are met" because animals "cannot communicate to the Company that needs have or have not been satisfied." (No Action Letter pp. 4-5.)³ This statement is foolish and undignified. The test for providing enrichment measures for the primates, dogs, cats, mice, and hamsters in Pfizer laboratories cannot hinge on whether they can express gratitude to the Company. In short, Pfizer's position that the absence of animal-to-human communication implies no implementation of enrichment measures is profoundly absurd and flippant.

For the foregoing reasons, we respectfully request that the SEC advise the Company that it will take enforcement action if Pfizer fails to include the proposal in its 2006 proxy materials. Please feel free to contact me should you have any questions or require further information. I may be reached directly at LeanaS@peta.org or (757) 962-8327.

Very truly yours,



Leana Stormont
Counsel, Research & Investigations

SLH/pc

cc: Margaret M. Foran via fax to (212) 573-1853
Frank and Joann Randall

³ Pfizer cites to "the Proponent's own publications ..." and the "Proponent's website ..." attaching Exhibits B and C, which are PETA materials. The Company, having merely reproduced the No Action Letter of December 9, 2005 submitted by General Electric, failed to notice that the proponents of this resolution are Frank and Joann Randall, holders of 1,500,000 shares of Pfizer stock, not PETA.

Exhibit B, "Frequently Asked Questions" relates to the March of Dimes. Exhibit C is an article entitled "Why Primates Make Poor Research Subject." Neither of those Exhibits supports the Company's position. The quote from Exhibit B that "All animal experiments involve physical and/or psychological harm to the animals," militates in favor of implementing enrichment programs for laboratory animals. The article attached as Exhibit C is focused exclusively on the use of primates in experimentation, and does not support the proposition that primates should be deprived of social, psychological, and behavioral enrichment because it is useless. These references are not relevant and are a simple attempt to shift the burden to the proponents, which is improper.

January 26, 2006

BY REGULAR & ELECTRONIC MAIL: cfletters@sec.gov

Office of the Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, N.W.
Washington, D.C. 20549

Re: Shareholder Proposal of People for the Ethical Treatment of
Animals for Inclusion in the 2006 Proxy Statement of Bristol-
Myers Squibb Company; and

Shareholder Proposal of Frank and Joann Randall for Inclusion in
the 2006 Proxy Statement of Pfizer Inc. (Leana Stormont
designated representative)

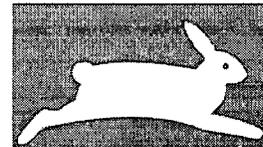
Ladies and Gentlemen:

This letter is filed in further response to the no action letters submitted by
Bristol-Meyers Squibb (Dec. 22, 2005) and Pfizer (Dec. 16, 2005). Each
Company filed virtually identical no action letters. Specifically, the
Companies both claim that the words "*ensure* ... superior standards of care for
animals [used in laboratory testing and] ... *ensure* that animals'
psychological, social and behavioral needs are met" render the proposals so
vague and indefinite as to be impossible to implement. (Emphasis supplied.)

Since we know that this is the Staff's busiest time, we will be brief. Legal
Bulletin No. 14B (Sept. 15, 2004) allows a shareholder to "make revisions that
are minor in nature and do not alter the substance of the proposal."

Accordingly, in the interests of expediting this matter, we will agree to
substitute the words "provide" and "address" in place of "ensure" where
"ensure" relates to superior standards of care and enrichment measures. The
resolution can therefore read as follows:

BE IT RESOLVED, that the shareholders request that the
Board issue a report to shareholders on the feasibility of amending the
Company's Policy to ... (b) provide superior standards of care for
animals who continue to be used for these purposes, both by the
Company itself and by all independently retained laboratories,
including provisions to address the animals' psychological, social and
behavioral needs...

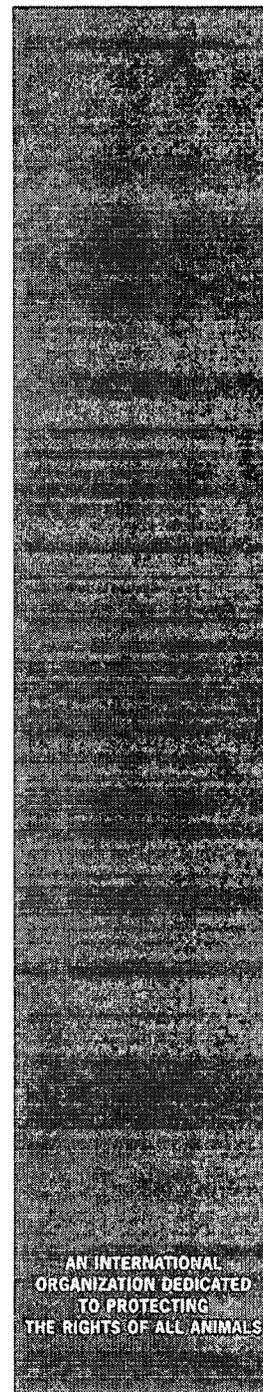


PETA

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THE RIGHTS OF ALL ANIMALS

It should be reiterated here as well that the resolution is simply calling on the company to *issue a report on the feasibility* of implementing these measures.

We thank the Staff for its consideration of our position.

Very truly yours,

A handwritten signature in black ink, appearing to read "Leana Stormont". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Leana Stormont
Counsel, Research & Investigations

SLH/pc

cc: Sandra Leung (by e-mail to sandra.leung@bms.com)
Margaret M. Foran via fax to (212) 573-1853
Frank and Joann Randall

February 9, 2006

**Response of the Office of Chief Counsel
Division of Corporation Finance**

Re: Pfizer Inc.
Incoming letter dated December 16, 2005

The proposal requests that the board issue a report to shareholders on the feasibility of amending Pfizer's animal use policy in two specified ways.

We are unable to concur in your view that Pfizer may exclude the proposal under rule 14a-8(i)(3). Accordingly, we do not believe that Pfizer may omit the proposal from its proxy materials in reliance on rule 14a-8(i)(3).

We are unable to concur in your view that Pfizer may exclude the proposal under rule 14a-8(i)(6). Accordingly, we do not believe that Pfizer may omit the proposal from its proxy materials in reliance on rule 14a-8(i)(6).

Sincerely,



Mary Beth Breslin
Special Counsel