Reviewer's report

**Title:** The Rise of Digital Direct-to-Consumer Advertising?: Comparison of Direct-to-Consumer Advertising Expenditure Trends from Publicly Available Data Sources and Global Policy Implications

**Version:** 1

**Date:** 22 February 2015

**Reviewer:** Joel Lexchin

**Reviewer's report:**

This is an interesting manuscript that updates the information about DTCA spending in the United States and looks at trends in the subcategories of DTCA. For the most part it is well done but there are a few areas that need further clarification.

**Major compulsory revisions**

Page 6, first paragraph:

The authors should describe what they mean by "globalization of eDTCA".

Page 6, second paragraph:

The authors should explain why they only wanted to examine only data that would be accessible to the general public.

Page 9, third paragraph:

The authors should note what percent of total promotion expenditures went to DTCA in 2005 and 2009 and if there was a difference.

Page 11, first paragraph:

The authors should provide more detail about the under regulation of eDTCA in the US and whether there are ongoing efforts by the FDA to regulate this area.

Page 11, second paragraph:

How are the authors using the term "counterfeit"? Does this refer to medicines that allegedly violate trademarks or patents or does it refer to medicines that are deliberately falsified?

**Minor essential revisions**

Page 4, first paragraph:

Reference 3 has now been superseded by Spurling et al. PLoS Medicine 2010;7:e1000352.

Page 8, third paragraph, third sentence:
This sentence just repeats the last one and should be deleted.

**Level of interest:** An article of importance in its field

**Quality of written English:** Acceptable

**Statistical review:** No, the manuscript does not need to be seen by a statistician.

**Declaration of competing interests:**
I declare that I have no competing interests