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Dockets Management Branch
Food and Drug Administration
HFA-305, Room 1-23
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Docket 01D-0361
Comments on International Conference on Harmonisation; Draft guidance on ICH Q1D Bracketing and Matrixing Designs for Stability Testing of Drug Substances and Drug Products DRAFT GUIDANCE

Dear Sir or Madam;

Enclosed please find comments from GlaxoSmithKline on the Draft Guidance on ICH Q1D Bracketing and Matrixing Designs for Stability Testing of Drug Substances and Dug Products. The comments are provided for consideration by the FDA. The specific comments are listed in order of appearance in the guidance, with general comments given first.

GlaxoSmithKline appreciates the opportunity to provide feedback and suggestions for this guidance. If you have any questions about these submitted comments, please feel free to contact me at (919) 483-5857. Thank you for your consideration.

Sincerely,

Mary Faye S Whisler

Mary Faye S. Whisler, Ph.D.
Assistant Director
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Specific Comments

The guideline would have benefited from tables to describe when bracketing and matrixing can be applied, at least to supplement the text.

The examples given in lines 67 to 70 are repeated in lines 84 to 87. Suggest remove or précis lines 67 to 70.

The example given in Table 2, one half reduction, is not a particularly good design. The test point for strength S1, batch 3 time 24 months should be at 18 months.

In addition, since each batch could refer to a common granule or input batch of active drug substance, attempts should be made to balance across batches. This is not so in this example since batch 1 is tested 11 times, B2 12 times and B3 10 times. If the testing schedules for S2, batches 2 and 3 are switched then the design becomes balanced as each batch will then be tested 11 times

In Table 3b, in order to obtain a balanced design, batch 3, strength 1, container B should not be tested, i.e., the T1 for that presentation should be deleted.