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November 5, 2001

Dockets Management Branch (HFA-305)
Food and Drug Administration,
5630 Fishers Lane, Room. 1601
Rockville, MD 20857.

Re: Docket No. 01D-0368
Coments on Draft "Guidance for Industry: Submitting Marketing Applications According to the ICH-CTD Format — General Considerations"

Dear Sirs:

We are providing comments to Docket No. 01D-0368 on the above captioned draft guidance document.

We have two general comments.

The draft guidance clearly identifies the Agency's willingness to accept New Drug Applications (NDAs) and specific types of Biological License Applications (BLAs) in Common Technical Document (CTD) format and encourages sponsors to "regularly" submit applications in CTD format by 2003. While we welcome this clear statement of an overall implementation strategy, we are concerned with possibility of an uneven acceptance of this proposal at the Division/reviewer level. We urge the Agency to insure the broad acceptance of this guidance, in particular, and the CTD in general by all Divisions and reviewers. We hope to avoid the same confusing and uneven implementation that continues to characterize the transition to electronic submissions in various reviewing divisions. We wish to avoid the need to negotiate with each division each time we plan to submit an application as to whether it will be acceptable to provide the application in CTD format.

The draft guidance indicates that the Agency is willing to accept submissions in mixed format. It would helpful if more explicit direction would be provided. For example, what would be the Agency's expectations in terms of the NDA summary when sections of the submission are provided in CTD format.?

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The draft guidance indicates that the Agency wishes to encourage electronic submissions. While we understand that the eCTD specification remain under discussion, we recommend that this portion of the guidance be expanded and clearly address an interim approach for submitting CTD submissions in electronic format. It is our view that the electronic submission, if well defined, will play a key role in facilitating the transition to the CTD.

Absent final agreement on the eCTD specifications, should sponsors submit a CTD formatted submission with an overall table of contents in PDF format?

It appears that sponsors should continue to use the same folder naming conventions that are presently in place for NDA and BLA when providing a CTD submissions in electronic format. This can cause some problems and confusion. A detailed map of which files are to be provided in which folders would be helpful to sponsors and probably even more helpful to reviewers who will have to cope with receiving electronic submission following existing NDA/BLA structures and submissions in CTD format, with both types using the same folder naming conventions. When does the Agency anticipate that it will adopt folder-naming conventions that are more in line with the CTD structure?

It would be helpful for this guidance to clearly address how publications associated with overview and summary documents should be handled in terms of the folder structure. Should a publications sub folder be included within the summary folder?

It would appear from the guidance that the Agency is suggesting that clinical pharmacology and pharmacokinetic studies should be included in the "CLINSTAT" folder versus the "HPBIO" folder. Does the Agency anticipate that the "HPBIO" folder will be empty or not provided for submission in CTD format? If so, this should be explicitly addressed in the guidance.

The guidance should be explicit as to the submission of datasets. The datasets would have been included in Module 5 of the CTD. Do sponsors continue to submit datasets using the CRT folder?

What are the expectations in terms of providing labeling information? Does the Agency continue to request a word-processing copy for revision marking along with the PDF version?

The guidance goes to some length to describe volume numbering and page numbering conventions. These seem to be focused on paper based submissions. These suggestions that cross-reference be shown as "module/tab identifier/page" becomes impractical in the context of the electronic submission where each file would be numbered 1 to n. This also problematic in view of the suggestion that files be placed in folders named according to NDA sections versus CTD modules.

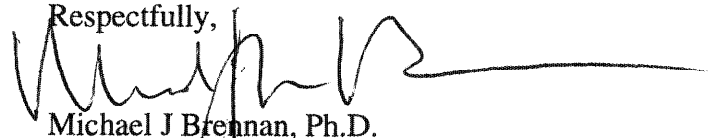
The guidance asked for volumes to be numbered in two ways: Volume X of Y and Module Z, Volume X. It would be simpler if these conventions were merged in to one way of showing the volume number. What is the expectation when the archival submission is submitted electronically?

Does the Agency anticipate a change in the 356h form to bring it into closer alignment with the CTD structure?

The guidance indicates which color covers should be used for the various reviewers' copies of the submission. The guidance indicates that both the statistical review copy and the field copy should be provided with green covers. It might be useful to provide these copies with different color cover to avoid any confusion.

We look forward to working with the Agency in supporting the transition to the CTD.

Respectfully,



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