

June 25, 2003

Dockets Management Branch
Food and Drug Administration
5630 Fishers Lane
Room 1061 – HFA-305
Rockville, MD 20852
fdadockets@oc.fda.gov

RE: Federal Register Doc 03-5205 — Bar Code Label for Human Drug Products and Blood
(Federal Register Volume 68, Number 50, Docket # 02N-0204, March 14, 2003)

Dear Sir or Madam:

With regard to the FDA's Proposed Rule on the Bar Code Label for Human Drug Products and Blood, we – MercuryMD, Inc. – support the National Alliance for Health Information Technology's (NAHIT) position articulated in the attached document entitled "Comments to FDA's Proposed Rule: Bar Code Label Requirement for Human Drug Products and Blood." This consensus reflects the views of a working group representing eighty-four (84) members of NAHIT from across the spectrum of healthcare.

The rule reflects the FDA's active process of listening to all stakeholders and its thoughtful consideration of the complex issues surrounding this topic. NAHIT is willing to provide the FDA with any assistance required as this rule is formulated and especially as the FDA considers modification to the National Drug Code (NDC) numbering system. This modification will require careful review and input from all stakeholders involved in the use of the NDC numbering system. Furthermore, NAHIT desires to work with the FDA on the further implementation of bar coding in healthcare to strive for a higher level of patient safety, quality of care, and operating efficiency as delivered through consensus-built IT standards and a true interoperable IT system for the healthcare field.

Again, NAHIT appreciates the opportunity to provide comment to the Proposed Rule on the Bar Code Label for Human Drug Products and Blood. If you have any questions about these remarks, please feel free to contact Scott Wallace, President and CEO of NAHIT at (312) 422-2180 or via e-mail at swallace@nahit.org; John Combes, M.D., Alliance Bar Code Work Group Co-chair, via telephone at (717) 561-5235 or via e-mail at jcombes@haponline.org; or Joe Pleasant, Alliance Bar Code Work Group Co-chair, via telephone at (704) 733-5415 or via e-mail at joe_pleasant@premierinc.com.

Sincerely,



Alan J. Ying
Chief Executive Officer
MercuryMD, Inc.

Attachment
AY:jmp