1905-D Palmetto Avenue Pacifica, CA 94044 650-557-5708 March 17, 2003

Attn: Mark McClellan Commissioner of Food and Drug Administration Dockets and Management Branch Department of Health and Human Services, Rm. 1-23 12420 Parklawn Dr. Rockville, MD 20857

Re: Bar Codes on Drugs Proposed

Dear Sir:

In commenting on proposed regulations for bar coding simple dose packaging of drugs for inpatient health care, I believe regulations should not be proposed that discourage or inhibit implementation of a reactive readable bar code directly imprinted on the pill capsule or solid form drug. This identification method has application in reducing medication errors in both inpatient and outpatient situations.

Conventional technology now exists for imprinting a limited, but adequate data barcode directly on the pill with ink and reading the imprint.

Furthermore, new technology exists for recognizing an embossed pill marked by capsule forming dies or the like.

The FDA would be taking a step-backward, if regulations impede rather than encourage adoption of a system that barcodes pills directly. Bar coding directly on the pill is inevitable.

Very truly yours,

Richard E. Peterson

REP/ssb

P.S. (Sample Enclosed)

cc: Tommy G. Thompson (w/enc.)

D2N-0204

C25