Aventis Pasteur

Aventis

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28 October 2003

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 2003D-0367; Draft Guidance for Industry on Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions [68 Federal Register 52044, August 29, 2003

Dear Sir/Madam,

Aventis Pasteur Inc. of Swiftwater, Pennsylvania thanks the Food and Drug Administration (FDA) for the opportunity to further comment on the above-referenced draft guidance for industry entitled, "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions." Aventis Pasteur Inc. is part of the Aventis Pasteur family of companies, which consists of the parent firm Aventis Pasteur SA, headquartered in Lyon, France, Aventis Pasteur Inc., and other subsidiaries (collectively Aventis Pasteur). In turn, Aventis Pasteur SA is a subsidiary of Aventis SA.

Aventis Pasteur is a world leader in vaccines and produces more than one billion doses of vaccines every year to immunize 400 million people around the world. Aventis Pasteur, in close consultation with the US public health establishment, including the FDA, and Centers for Disease Control and Prevention (CDC), strives to alleviate the suffering and death of vaccine-preventable diseases.

We offer the following comments for your consideration concerning the FDA's solicitation of responses as they apply to the Biologics (Vaccine) industry.

I. INTRODUCTION

(line 22) It would be useful to know FDA's recommendation on priority of electronic submissions, e.g., would e-submissions be required for INDs before BLAs? This will also affect (line 161) how we can reference previously submitted documents.

D. Document Granularity and Table of Contents Heading

(line 91) As each document should be provided as a separate file, does the FDA specify a file size limit? This may be a concern for larger or graphic-intensive files.

(line 111) The statement that one document can be associated with more than one heading seems to contradict the previous paragraph requiring one document per lowest hierarchy level.

2003D-0367 [redacted] C4

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J. Scanned Documents
(line 210) By "text-based documents" we understand this as, searchable PDF format documents.

L. Electronic Signatures
(line 223) Additional guidance regarding e-signature and FDA forms would be helpful, e.g., file format. Are paper copies of certifications with handwritten signatures still required?

R. Sending Electronic Submissions
(line 304) An indication of currently acceptable hard media would be helpful, as well as encryption requirements.

(line 310) Additional cross-reference to guidance on establishing secure email with the FDA would be helpful.

III. ORGANIZING THE MAIN SUBMISSION FOLDER
(line 333) Additional guidance on which hash/checksum algorithm would be helpful, e.g., eCTD guidance specifies MD5 as being more reliable than checksum for compressed files with digital signature.

E. Module-5: Clinical Study Reports folder
(line 669) Each CRF should be provided as a single PDF, with the 50MB limit. This may not be possible, especially for remote data capture (eCRFs).

On behalf of Aventis Pasteur Inc., we appreciate the opportunity to comment on this draft guidance and thank you for your consideration of these responses. Should you wish to discuss any of our comments or concerns further, please address inquiries directly to Kenneth P. Guito, Director, Regulatory Policy and Intelligence, by telephone at (570) 839-4212, or by email at ken.guito@aventis.com.

Sincerely,

Kenneth P. Guito

Luc Kuykens, MD, MPH, DTM
Vice President, Regulatory Affairs, North America
and Authorized Official

LK/KPG/kh

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