

March 24, 2003

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

**RE: Proposed Bar-Code Rule for Pharmaceuticals**

Dear Sirs:

I am writing to express my support for the proposed rule regarding the mandatory inclusion of drug-identifying bar codes on all pharmaceutical products. The data is clear that the use of bar-coded technology will reduce specified types of medication errors and will contribute to an enhancement of safety systems.

Some will argue that bar-coded drug administration is imperfect, will create new types of errors, and that staff may "work-around" such systems. All of this is true, as it is in grocery stores. However, as in grocery stores, it remains that bar-coded drug administration is an inherently safer method of care delivery that will save lives.

Having said this, I am dismayed that the proposed rule does not require the inclusion of lot number and expiration date. Such information is required to be on the general label today and the value of their inclusion in the bar code is obvious. While some manufacturers will assert that the inclusion of such information poses insurmountable challenges, others already include this information. Clearly, they will be standard pieces of bar-coded information in the years ahead; it seems to make the most sense to require them from the start as opposed to introducing a new rule at a future date.

Sincerely,



Steven Meisel, Pharm.D.  
Director of Medication Safety

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