

*Johnson & Johnson*  
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Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852  
Ms. Aida Sanchez

November 20, 2002

Re: Comments on *Draft Guidance Bioavailability and Bioequivalence Studies for Orally Administered Drug Products – General Considerations*

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Dear Ms. Sanchez:

The above referenced FDA draft guidance entitled *Bioavailability and Bioequivalence for Orally Administered Drug Products – General Considerations*, issued July 2002 has been reviewed by scientists at Johnson & Johnson Pharmaceutical Research, Ltd.. Several comments and questions have been identified and are summarized as follows:

*Under Section III. D. In Vitro Studies (page 11) the draft guidance states “Dissolution profiles generated on all strengths in at least three dissolution media pH 1.2, 4.5 and 6.8 buffer).”*

Rather than testing all strengths, it is proposed that multi-media profiles be generated only on the high and low strengths if the qualitative formulations are identical. Dissolution profiles on all strengths could then be included in the dissolution medium of choice.

*Under Section VI. F. Narrow Therapeutic Range Drugs, (paragraph 2, page 21).*

In Paragraph 2, it would be helpful to have some examples of the types of studies recommended/examples of applicability in order to “provide increased assurance of interchangeability for drug products containing specified narrow therapeutic range drugs”. For example, under “additional testing and controls”, is the agency suggesting a pharmacodynamic study or a PK-PD study, or a replicate BE study to assess variability of the test formulation?

*Under Attachment A: General Pharmacokinetic Study Design and Data Handling, (paragraph 2, page 23).*

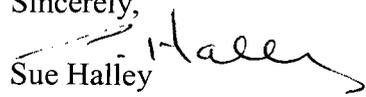
Please provide an explanation of how the “5 percent of C<sub>max</sub>” value was obtained? Is this value arbitrary, or is there justification from study examples?

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We greatly appreciate the opportunity to comment on this draft guidance and look forward to working closely with the FDA on future documents. If you have questions or need assistance, please contact me directly at 609/730-3425.

Sincerely,

  
Sue Halley

Manager

Global Chem-Pharm Regulatory Science

Johnson & Johnson Pharmaceutical Research and Development, Ltd.