III. B	161	Quality by design definition should include formulation as well as process design	
	171	Please include the concept of risk assessment for changes to existing processes	As written risk management is part of setting specification and process parameters as well as determining the need for discrepancy investigation and corrective action. Risk Management, in a life cycle approach, can assess and mitigate the risk of a change to a process or specification.
III D	175	CAPA needs to be presented in a clearer manner. Corrective actions are those applied to the current discrepancy (such as repacking, rework, etc.). Preventive actions are those designed to prevent recurrence.	FDA lists root cause analysis with corrective actions to prevent recurrence. Preventing recurrence is Preventive action not corrective action. Furthermore, preventive action is listed as action to prevent initial recurrence. This can be more correctly listed as root cause analysis to prevent recurrence.
III D	181	Please add the phrase in italics: Remedial corrections "to determine actions necessary for impact to all potential implicated batches".	The other two bullet points clearly describe how the CAPA is used in operations
III E	185	The example of material variability is not presented as an example, but should be. In the text later in the document it would be advisable to have more guidance on what kind of changes a manufacturer is empowered to make.	Pfizer is pleased to see FDA understands a change management system not only as a requirement to prevent unintended consequences as stated. The main purpose of change management is to allow for implementation of changes to facilitate continuous improvement.
	185	This section should be clarified to state that in modern quality systems these are the roles for management. Please add being part of the management team fulfills the role the quality unit can have to assure systems put in place meet the CGMP requirements.	
III E	185	Please change the term "Change Control" to "Change Management"	Please refer to Item B in our cover letter.
	196	Please add "ability to measure the effect of a change" to the basis by which a manufacturer is empowered to make changes	An important aspect of change management is the ability to assure the change is not detrimental to the overall quality. Without the ability to measure the effect of a change, a manufacturer can not determine the impact.
III F	207	Please add in the phrase in italics: QC usually consists of testing of selected in-process materials, "raw materials" or "components" and finished products…	Testing of raw materials and components is an important aspect of the QC function. Variability in raw materials and components can affect the product and process. The addition of these items completes the listing of items tested throughout the process.
III F	217	"The cGMP regulations specifically assign the quality unit the authority to create, monitor, and implement quality systems." Please expand to include cross functional teams instead of just the quality unit.	Quality systems are for the most part cross functional systems. Therefore cross functional teams are required to create, monitor, and implement them. Also since senior management is ultimately responsible for the quality system, they should monitor them.