

SCARAB GENOMICS
LLC

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Herbert A. Smith, Ph.D.
Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Supplementary material concerning FDA Guidance for Industry Considerations for Plasmid DNA Vaccines for Infectious Disease Indications

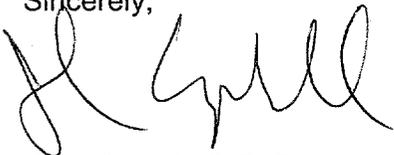
Dear Dr. Smith:

I am sending the enclosed publication at the request of Fred Blattner to supplement earlier correspondence regarding the presence of Insertion Sequence elements in plasmid DNA recovered from *E. coli* hosts.

This particular report specifically highlights the frequent transposition of IS1 from the *E. coli* chromosome into plasmids based on the popular Vical V1J template after replication in DH5alpha cells. In our experience this phenomenon is not restricted to the V1J plasmids or to this particular bacterial cell line. As outlined in our previous correspondence, this is a common occurrence in even well adapted plasmids such as pBR322. We believe that the presence of low levels of IS contamination in vaccine plasmids is best controlled by propagating plasmids in IS free bacterial hosts.

Hopefully, this issue can be explicitly addressed in future Guidelines for Plasmid DNA Vaccines.

Sincerely,



John Campbell, PhD
for Frederick Blattner, Ph.D.
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