

 Southern New Hampshire
Medical Center
PHARMACY DEPARTMENT

0271 0 342 1510

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

June 22, 2005

In regards to **Docket No. 2005D-0174**, we believe that FDA's recent guidance policy (CPG 7132b.11) allowing firms such as Regional Services Center (RSC) of Woburn, Massachusetts to assign up to a one year expiration dating period to solid and liquid oral dosage form drug products repackaged into unit dose containers without conducting new stability studies conducive to safer medication practices in hospitals. Our observation is that standardized medication labeling provided by RSC is instrumental in reducing this hospital's medication error rate. I have personally received comments from nurses responsible for administering medication indicating their pleasure with the standardization and clarity of the RSC label. These nurses indicate that they enjoy the improved product identification due to RSC labeling and feel more confident when administering medications to their patients.

By allowing re-packaging firms such as RSC the one year dating period, FDA is allowing for cost effective unit dose packaging while improving patient safety by encouraging hospitals to outsource their unit dose packaging to an FDA regulated facility operating under FDA current Good Manufacturing Practices.



John F. Sullivan
Assistant Director, Pharmacy Services

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