MAJOR SUPPLIER OF CRYOGENICS AND WELDING EQUIPMENT

NATIONAL WELDERS SUPPLY COMPANY

P.O. Box 31007
Charlotte, NC 28231-6098
Phone 704/333-5475
Fax 704/334-6390

January 22, 2007

Division of Dockets Management (HFA–305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

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Comment Re: Docket No. 2005N-0403 / RIN 0910-AA49: Comments to Proposed Rule related to Requirements for Establishment Registration and Listing and Labeling for Human Drug Products

National Welders Supply Company, Inc. appreciates the opportunity to comment on the proposed rule identified as Docket No. 2005N-0403. 71 Fed. Reg. 51276 (Aug. 29, 2006). National Welders has served the health care industry by manufacturing and distributing medical gases throughout the Southeast since 1946.

National Welders strongly supports the comments on this proposed rule submitted by the Compressed Gas Association (CGA) and Gases and Welding Distributors Association (GAWDA). National Welders is concerned these proposed changes will significantly and detrimentally impact medical gas operations, logistics, and finances, and potentially affect the industry's ability to promptly and efficiently deliver medical gases to end users.

We fully support CGA and GAWDA's request that the Agency exempt medical gases from the requirement that appropriate human readable NDC numbers be placed on drug product labels. We request that the Agency consider the unique aspects of the medical gases industry when estimating the impact of the proposed requirements. In our view, the proposed rule will cause increased errors in technical misbranding, increased costs with questionable benefit regarding traceability, and increased risk to patients due to delays in supply and potential un-availability of life sustaining medical gases.

National Welders thanks FDA for its consideration of these comments and the comments submitted by CGA/GAWDA.

Sincerely,

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Todd A. Jackson
QC Manager
Production, Safety and Compliance

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