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FDA Dockets Branch (HFA-305)  
Food and Drug Administration  
5603 Fishers Lane, Room 1061  
Rockville, MD 20852

RE: Docket No. 98N-0339, in support of the public hearing on CVM  
required by Section 406(b) of the FDA Modernization Act

This letter is in support of the recommendation on modifying new product efficacy requirements submitted earlier by Dr. Eric Gonder. The poultry industry employs a cadre of well trained and experienced disease control and prevention specialists who can quickly evaluate the efficacy of a new product under actual conditions. The structure of the industry facilitates such efficacy determinations. Product safety is another matter, however, and should not be left undetermined before a new product is licensed.

In my experience, it doesn't take the poultry industry long to "weed out" products that don't perform as advertised. They quickly put new products to the test and can determine better than anyone if they work or if they don't.

I support Dr. Gonder's position and urge that it be given serious consideration. Everyone will be better off, including the FDA.

Respectfully submitted,

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CWB:da

98N-0339V

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