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December 19, 2003

Dockets Management Branch
U.S. Food and Drug Administration
HFA-305
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

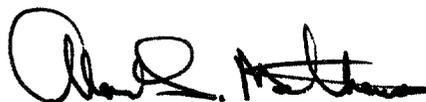
Re: Docket No. 2003D-0465 – Draft Guidance for Industry, “Providing
Regulatory Submissions in Electronic Format – General Considerations”

The ANIMAL HEALTH INSTITUTE (“AHI”) submits these comments to the Draft
Guidance for Industry, “Providing Regulatory Submissions in Electronic Format – General
Considerations” published by FDA in the *Federal Register* on October 22, 2003.

AHI is the national trade association representing manufacturers of animal health
products – the pharmaceuticals, vaccines and feed additives used in modern food production, and
the medicines that keep livestock and pets healthy.

AHI commends the Agency for articulating its process for providing regulatory
submissions in electronic format. We provide the following general and specific comments for
your consideration prior to the finalization of this document.

Sincerely,



Alexander S. Mathews

Enclosure

2003D-0465

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Comments Submitted by the Animal Health Institute

				Date December 19, 2003	Document: Docket #2003D-0465 GFI Providing Regulatory Submission in Electronic Format – General Considerations
Commenter	Section Page No.	Paragraph Figure/ Table Line No.	Proposed Change	Comment/ Rationale	
AHI	General			The FDA transmittal sheet, cover letter, instructions for viewing, etc. are not discussed in this guidance. AHI suggests that Center preferences on how these documents should be handled be included in this guidance document.	
AHI	General			AHI recommends inclusion of an "Inventory of Files" page which would include all the file names and a description of the file (with a hyperlink to the file). This would enable the Agency to ensure all the files of the submission are present. (If the "Roadmap" is the same as an inventory of files, please clarify this in the Roadmap section.	
AHI	General			AHI strongly encourages the Agency to include a section on definition of terms.	
AHI	General			Thumbnail prints are not addressed in this guidance. We suggest that they be addressed, even if it is to say that they are not necessary.	
AHI	IV.	Line 82-83	"Enable the user to easily view a clear and legible copy of the information on a computer monitor screen.	Clarification	
AHI	IV	Line 94-95	"...you should submit all electronic documents in Adobe portable document format (simply called 'PDF' in the remainder of this document).	Neither PDF nor portable document format have been trademarked by Adobe, but are generic terms. This suggested change clarifies the format to be used.	
AHI	IV	Line 105-106	Replace the sentence "We should be able to read all PDF files with Acrobat Reader version 4.0, and above with the search plug in." with a sentence that clearly identifies the PDF specification the submitted file should be compatible with.	Clarification for the sponsors.	
AHI	IV	Line 118-119		It should be noted that it is not possible to force Adobe Acrobat to embed all fonts completely.	

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AHI	IV	Line 128 Table 1	4 column headings rather than the current 2: Font Type Font Name Font Description Trademark Company	The first row of the table has the following two headings for the columns: Font Type and Font Name. Under the column entitled Font Name is included the name of the font and a description of that font and in some cases, the company who trademarks the font. For clarity two more columns one entitled "Font Description" and one entitled "Trademark Company" should be added.	
AHI	IV	Line 133-135		AHI seeks additional clarification of this statement.	
AHI	IV	Line 141	"We recommend the use of a black font color for all report text and tables except that blue fonts should be used for hypertext links..."	There may be occasions when font color other than black is useful, such as in graphs, DNA sequencing, etc.	
AHI	IV	Line 149	"Pages should be properly oriented for readability on a computer screen to reduce the effort of rotating pages."	Clarification	
AHI	IV	Line 155-159		AHI seeks clarification on how to handle source documents on different paper sizes, such as European size paper (A4) and engineering CAD drawings.	
AHI	IV	Line 159-160	Header and footer information must appear within these same margins.	As the sentence originally read, the headers and footers can have a left hand margin of 3/8" which could cause problems if the document is printed and bound.	
AHI	IV	Line 167-170		AHI seeks additional clarification that the intent of this section is for searchable text and could include scanned image plus hidden text. AHI would also like to point out that in order to verify that all OCR text is accurate a line-by-line comparison of every page that has been scanned must be carried out. Compliance with this requirement would be very time consuming, costly, and overly burdensome.	

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AHI	IV	Line 174-175		This sentence is vague. The method for creating PDF documents that would best replicate a paper document should be detailed here. For example, the "Job Option" settings for Acrobat Distiller are specifically detailed in the EPA guidance for Electronic Submissions (http://www.epa.gov/oppfod01/eds/softset_study.pdf). EPA also offers an electronic download to automatically set the Acrobat Job Options. AHI recommends that FDA include in this guidance acceptable standards to ensure the highest quality replication of a paper document.
AHI	IV	Line 180-181	"However, we realize there may be instances where a higher dpi may be necessary."	AHI recommends the inclusion of an additional sentence to cover certain circumstances.

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AHI	IV	Line 194-235	Consider allowing JPEG or other lossy compression techniques with a reasonable balance between resolution and a low level of compression.	<p>The subject of resampling and compression is a complex one. In general, we have found that the recommendations for black and white (monochrome) images and for greyscale images are acceptable. However, <i>if the images are obtained and processed properly</i>, we have found the use of a low level (maximum to high quality, in Acrobat Distiller options) of JPEG compression to be perfectly acceptable when used on color photographic images embedded in the PDF file with an effective resolution of at least 300 dpi. In fact, it may be possible to use an image with 600 dpi or higher resolution with a higher level of JPEG compression to yield a smaller PDF file without introducing any visible artifacts. The recommendation the “for photographs, the image should be obtained with a resolution of 600 dpi” will yield unacceptably large PDF files, unless some level of JPEG compression is allowed.</p> <p>The complete prohibition of compression of medical images sent to CBER is simply not defensible. Lossless compression algorithms, such as ZIP/Flate, by definition do not alter the image at all. Further, as stated above, the proper combination of resolution and JPEG compression will yield PDF files of acceptable size and images with no visible compression artifacts.</p> <p>In this context it should be noted that many digital cameras use some form of lossy compression, frequently JPEG, and lack any option to capture an uncompressed image. Thus, the only source of an image may already use lossy compression.</p> <p>We acknowledge that considerable training effort is required for document authors to achieve the appropriate balance between resolution and amount of compression, and the approach taken in this draft guidance may be intended to avoid this burden on industry. However, AHI recommends some flexibility on handling resolution and compression issues provided the sponsor can demonstrate that the methods they have chosen preserve the integrity of the information in the image, i.e., do not introduce compression artifacts.</p>
AHI	IV	Line 214	Sentence should be deleted.	AHI believes that this topic is not appropriate for this document and may conflict with the predicate rules.
AHI	IV	Line 221	Addition of the words “when possible” at the end of this sentence.	Photographs may be all that is available, especially for legacy gels.

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AHI	IV	Line 221-222		This sentence recommends using 8-bit greyscale. AHI recommends allowing color scans if it enhances the readability of the gel.
AHI	IV	Line 249-254		AHI found this section lacking in clarity and would appreciate clarification/definition of terms used, such as "roadmap," "item table of contents," and "top of the bookmark hierarchy."
AHI	IV	Line 275-285		In some circumstances, overall pagination enhances the quality and continuity of the submission. AHI members would like to retain the option of choosing the method of pagination most appropriate to the submission.
AHI	IV	Line 289-290	Amend sentence to read: "Document information fields are used when doing a full text search on keywords. They indicate which documents contain the keyword. to search for individual documents and to identify the document when found. "	Clarity
AHI	IV	Line 308		AHI suggests that the Agency add a recommendation for the character length of folders.
AHI	IV	Line 311	Replace "Underline" with "Underscore."	Clarity
AHI	IV	Line 322		AHI suggests the inclusion of a statement in this section that the electronic submission should be prepared using software to index the submission, enabling the Agency to perform full text searches. This rationale is implied, but not stated.
AHI	V	Line 470-488		Another chemical drawing/viewing application that is compatible with Molfiles is Advanced Chemistry Development, Inc., ACD/Chemsketch 5.0, a free 32-bit Windows application (www.acdlabs.com). Also, note that an application such as ISIS/DRAW that is described as "free for personal use," should not be used in a corporate setting without agreement from the developer, CambridgeSoft.
AHI	VI	Line 499	Add to the end of this section: " Discuss with the appropriate Center which method of sending a submission electronically is acceptable to them. "	Clarity

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AHI	VI	Line 591	Lines 504-507 and 578-589 should be included in this section.	We believe that this information should be placed here for the benefit of the reader submitting electronically to the Center for Veterinary Medicine.
AHI	VI	Line 596	Heading should read: "What type of physical media should I use?"	Clarity
AHI	VI	Line 603-604 Table		Is the Agency considering DVD media now or in the near future?
AHI	Appendix A	Line 688		AHI is seeking clear direction on how to put together a "Roadmap." We are seeking definition of the elements, formatting and other appropriate instructions.
AHI	Appendix A	Line 702 and 791	"Adobe Exchange" should be changed to read "Adobe Acrobat."	Adobe Acrobat is no longer called "Exchange."
AHI	Appendix A	Line 797	The number "17" should be deleted.	Appears to be a misprint in the document.