

**PURDUE**

**Purdue Pharma L.P.**

One Stamford Forum  
Stamford, CT 06901-3431  
(203) 588 8000  
Fax (203) 588 8850  
www.purduepharma.com

November 8, 2000

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

58 '00 NOV 13 P1:07

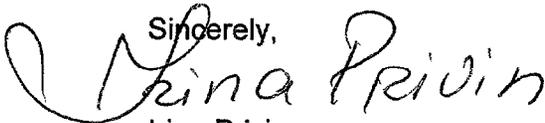
Re: **Comments to Docket No. 00D-1424, "Analytical Procedures and Methods Validation: Chemistry, Manufacturing, and Controls Documentation"**

Dear Sir / Madam:

Purdue Pharma L.P. has reviewed the draft guidance for industry entitled "Analytical Procedures and Methods Validation: Chemistry, Manufacturing, and Controls Documentation" and is grateful for the opportunity to provide our comments. Our comments to Docket No. 00D-1424 are provided in Attachment 1.

If you have any questions, please do not hesitate to contact me at the number below.

Sincerely,



Irina Privin  
Associate Director  
Regulatory Affairs-CMC  
(203) 588-7485

00D-1424

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## Attachment 1

Comments on draft guidance for industry entitled "Analytical Procedures and Methods Validation: Chemistry, Manufacturing, and Controls Documentation"

### Lines 122-123

"A stability indicating assay is a validated quantitative analytical procedure that can detect the changes with time in the pertinent properties of the drug substance and drug product."

Comment: A method need not be quantitative to be stability indicating. Appearance tests produce more stability failures than any other test method.

### Lines 160-162

"Analytical procedures used to characterize a reference standard should not rely solely on comparison testing to a previously designated reference standard."

Comment: Earlier in the same section, it is stated that USP standards do not require additional characterization. Yet, this test would require extensive characterization, even if the proposed standard gave the same response for a given test as the USP standard. The need for this requirement is unclear.

### Lines 189-190

"Appropriate physical constants such as melting range, boiling range, refractive index, dissociation constants (pK values), and optical rotation."

Comment: Once the structure has been established, checks of physical constants should be viewed as confirmatory. Extensive physical characterization on each standard is redundant to proof of structure. Physical testing as appropriate for intended use should be performed (e.g., demonstration of correct polymorph for standards to be employed in x-ray analysis).

### Lines 327-328

"The DL or QL can be set using the drug substance's detection response."

Comment: The DL or QL for an impurity can be set using the drug substance's detection response in the absence of an appropriate impurity standard.

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From: JUDITH B. SANTOS (203)588-8045  
PURDUE PHARMA LP/Regulatory Affairs  
ONE STAMFORD FORUM, 8th Floor  
201 TRESSER BLVD  
STAMFORD, CT, 06901

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