

Aventis Pharmaceuticals



2730 '01 NOV 16 AIO:36

November 15, 2001

Via Fax and UPS

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

Re: Docket No. 01D-0278

Draft Guidance for Industry – Submitting Type V Drug Master Files to the Center for
Biologics Evaluation and Research, August 2001.

Dear Sir/Madam:

Aventis Pharmaceuticals would like to thank you for the opportunity to comment on the above-referenced Draft Guidance for Industry entitled “– Submitting Type V Drug Master Files to the Center for Biologics Evaluation and Research”. The document discusses the circumstances in which CBER will accept a Type V Drug Master File without a letter of intent from the DMF holder. The information in the DMF may be used to support an application or supplement, such as an investigational new drug application (IND), biologics license application (BLA), or a new drug application (NDA) submitted to CBER.

We reviewed the document and have the following comments:

General Comments

1. Similar to other guidances that are issued by the Agency, there normally is a definition section that provides definitions to terms referenced within the guidance. It is recommended that a definition be applied to “letter of intent” in a definition subsection for the guidance and provide an example format.
2. Has a formal date been announced when will regulations pursuant to 21 CFR 314 be finalized?

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Section II Information That May Be Submitted in a Type V DMF Without Submitting a Letter of Intent

Section A. Facilities for Production of Gene or Cell Based Therapies for Phases 1 and 2 Clinical Trials

1. On page 2, paragraph 3, the first sentence is unclear. If web based tools are not accessible, it is recommended that a hardcopy of the rules be available.
2. The type of information submitted to the Type V DMF should not be limited to those items identified on pages 2 and 3. It is recommended that the information be consistent with guidances issued from CBER covering facilities used for production.

Section B. Contract Manufacturing Facilities in Support of Biologics License Applications or Biologics License Application Supplements

1. On page 3, section 1 (production facilities), it is recommended that the applicant be informed of any updates. If proprietary information is being submitted, the information does not need to be disclosed to the applicant.

Section IV Updating DMFs

1. Aventis is of the opinion that customers should be notified of updates to DMFs, although confidential or proprietary information does not need to be disclosed. Such practice is consistent with the September 1989 Guidance for Drug Master Files. Please reference page 18, Section VII. Holder Obligations section, C. Annual Update which states "*If the subject matter of the DMF is unchanged, the DMF holder should provide a statement that the subject matter of the DMF is current.*"

On behalf of Aventis Pharmaceuticals, we appreciate the opportunity to comment on the Draft Guidance for Industry – Submitting Type V Drug Master Files to the Center for Biologics Evaluation and Research and thank you for your consideration.

Sincerely,



Steve Caffé, MD

Vice President, Head GRAMS – North America
Global Regulatory Approvals and Marketing Support

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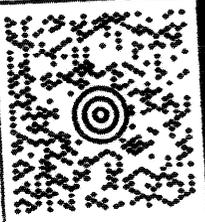
ERIC ALBEE
(908) 231-2192
AVENTIS PHARMACEUTICALS
1041 RT. 202-206 N.
BRIDGEWATER NJ 08807

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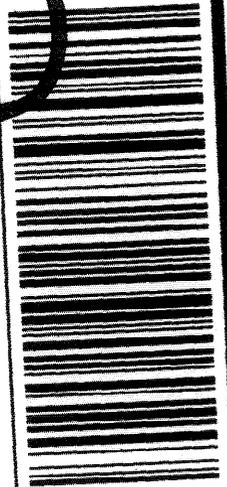
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