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10/08/03

Division of Dockets Management
Food And Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket No. 2003N-0211

To Whom It May Concern:

The following are comments to the proposed "Revisions to Labeling and Storage Requirements for Blood and Blood Components, Including Source Plasma, dated July 30, 2003.

The proposed changes for the length of storage of non-cellular blood components from the current 12 months at -18°C to two years at -25°C or colder and three months at -18°C will present an economic burden for the rural hospitals that provide these transfusion products. These expenses include having settings reformatted on freezers used to store the non-cellular blood components. This will be an enormous cost to the industry because these settings can only be adjusted by the manufacturer of the freezers. An additional expense for our hospital would be purchasing a new freezer that is capable of maintaining -25°C or colder at all times. This type of freezer will cost approximately \$5,000, which will be very cost-prohibitive for us due to the volume of frozen products used.

It is important realize that if equipment can not be reformatted or new freezers purchased due to the cost burden, rural hospitals will experience an substantial increase in frozen products that will be outdated, or they will be unable to store frozen products. This may create a delay in life-saving patient treatment or unnecessary transfer of patients between facilities for treatment. This outdateding of products also negatively impacts the financial situation in rural hospitals. The patients in rural areas need to have non-cellular blood components available to provide the best care for emergency situations.

Our goal to provide the best product at the most efficient price available is in conflict with this proposed change. We request you to consider our statements before changing the storage requirements for FFP and Cryoprecipitate. I would also request further studies be made supporting the 3 month expiration of products before action is taken.

Thank you for considering my comments.

Sincerely,

Paul J. Goedicke CLT(HHS)

Paul J. Goedicke, CLT(HHS)
Administrative Laboratory Director

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