

1 **Minutes of the DPTC Teleconference**
2 **on 18 May 2005**

3 **ATTENDEES**

Terry Tougas, <i>Chair</i> (Boehringer-Ingelheim, IPAC-RS)	Lana Lyapustina (IPAC-RS Secretariat)
Tony Amann (ACN Pharma, GPhA)	Lee Nagao (IPAC-RS)
Clyde Anthony (USP)	Guirag Poochikian (FDA)
David Christopher (Schering-Plough, IPAC-RS)	Rajendra Uppoor (FDA)
Sylvia Gantt (PQRI Executive Secretary)	Russ Somma (IPS, ISPE)
Frank Holcombe (OGD/FDA)	Bob Wiens (Eli Lilly, IPEC)
	Bruce Wyka (Schering-Plough, IPAC-RS)

4 **DECISIONS MADE**

- 5 1. The revised survey of the Excipients WG will be reviewed by DPTC and SC in parallel
6 within two weeks.
- 7 2. Ms. Gantt will clarify by email the dates and locations of future face-to-face DPTC meetings.

8 **DISCUSSION SUMMARY**

9 *Opening*

10 Dr. Tougas opened the teleconference. Dr. Lyapustina read the following antitrust
11 admonition: “Our discussions today are subject to the anti-trust guidance applicable in the
12 U.S. and E.U. Nothing discussed at this meeting is intended to restrict the individual
13 decision-making of any member company or to represent an agreement to coordinate
14 marketing or sales conduct. Those participating in this meeting are instructed to avoid
15 discussion of competitively sensitive subjects, including, but not limited to, confidential
16 marketing, sales, and pricing information.”

17 The objective of the teleconference was to review status update reports from the DPTC
18 Working Groups.

19 *The RFID Working Group*

20 Dr. Seevers reported that only two companies had submitted data, which documents thermal
21 effects of RFID, and is limited to typical exposure times (on the order of microseconds) as
22 opposed to the scenario outlined in the Agency’s letter to interested parties for their
23 feasibility studies in early 2004 (16-hour exposure). Dr. Seevers also said that he and Dr.
24 Massa had identified protein NMR experts from BMS, who would help compare the non-
25 thermal effects of radio-frequency waves (used in both NMR and RFID) on large biological
26 molecules. According to Dr. Seevers, that analysis should present a most conservative case
27 because RF power used in NMR is orders of magnitude higher than that used in RFID. For

28 example, for some NMR irradiations the energy input is so large that active cooling of the
29 sample is required while in RFID the recorded temperature increases are on the order of a
30 few degrees or fractions of a degree.

31 At the end of this evaluation, Dr. Seevers explained, the RFID WG will be able to email to
32 DPTC a summary table quantifying RFID risks compared to those of NMR, and
33 demonstrating whether or not experimentation on non-thermal effects of RFID would be
34 required.

35 Dr. Seevers indicated that the question of thermal effects of RFID has already been answered
36 with existing data on typical exposures, although there is no data on long-term effects. Dr.
37 Poochikian said that leaving the issue of biological molecules aside for the moment, he did
38 not expect anything bad to happen to those products (e.g., solid oral dosage forms) due to
39 longer exposure.

40 Dr. Poochikian requested and received permission to share the summary table and related
41 information (e.g., protocol, energy deposition, electromagnetic field, etc.) to be provided by
42 the RFID WG with his CDRH and CBER colleagues. Dr. Poochikian added that the FDA
43 task force would be publishing or has already published a report on the progress of RFID
44 initiative (posted at <http://www.fda.gov/oc/initiatives/counterfeit/update2005.html>).

45 In response to a question, Dr. Seevers clarified that if additional data is submitted by
46 companies, it would be reviewed.

47 Dr. Seevers indicated that the outlined work would be completed within a month.

48 ***The Container Closure Working Group***

49 No updates were available from this Working Group at the time of the teleconference.

50 ***The PSD Mass Balance Working Group***

51 Dr. Tougas reported on the recent significant developments in the Mass Balance Working
52 Group. In the beginning of April, the Working Group held a face-to-face meeting that was
53 scheduled to discuss and attempt to finalize a recommendation regarding acceptance criteria
54 for mass balance. At that meeting, Dr. Lostritto put on the table a proposal on behalf of
55 himself, Dr. Poochikian and Dr. Rogers. The meeting agenda was revised in order to review
56 and discuss this proposal. Per the agreement at the meeting, the proposal was also evaluated
57 statistically subsequently to the meeting. During a follow-up teleconference at the end of
58 April, it was stated by Dr. Tougas and Ms. Strickland through the analysis of operating
59 characteristic curves that the proposal Dr. Lostritto presented is more restrictive than the one
60 considered by the Working Group in the original agenda. After some discussion, Dr.
61 Lostritto, speaking on behalf of himself, Dr. Rogers and Dr. Poochikian, proposed a hiatus in
62 the Group's activities citing the non-productive and time-consuming nature of the
63 discussions, which currently are becoming an excessive drain on their PDUFA workload
64 resources. Since a "hiatus" is a general procedural matter outside of the realm of the WG or
65 DPTC, the matter has been referred by Dr. Tougas to the attention of the PQRI Steering

66 Committee and would be discussed at the SC teleconference on 5/19. Dr. Poochikian agreed
67 with Dr. Tougas' account and had no further comments.

68 ***The PSD Profiles Comparisons Working Group***

69 Mr. Christopher reminded the DPTC, that as explained at the last DPTC meeting, the Profile
70 Comparisons Working Group had been working on 38 scenarios to evaluate the chi-square
71 ratio test proposed in draft FDA guidance. Based on that evaluation, FDA concluded that by
72 itself, the test is not sufficiently discriminating and should be supplemented with another (yet
73 undefined) test for fine particle mass in the impactor. Subsequent to that, the Working Group
74 collected information on more realistic scenarios, which will be used along with the original
75 38 scenarios in order to evaluate the combination of the chi-square ratio and the new
76 additional test.

77 Mr. Christopher indicated that the Working Group is on schedule according to the revised
78 timeline, and will likely reach consensus on a recommendation by the end of 2005, which
79 will be finalized in written form for submission to FDA in the first two quarters of 2006.

80 Mr. Christopher also reported that the Working Group's manuscript summarizing work and
81 findings to date ("Interim Progress Report") is being reviewed by the Steering Committee
82 and will hopefully be approved for submission to the Journal of Aerosol Medicine by the end
83 of the month. In response to a question, Mr. Christopher clarified that there is still some
84 discussion about the name for the new supplemental test, the currently proposed term being
85 "size-fractionated mass." Dr. Poochikian indicated that this is a minor consideration and
86 should not affect the Steering Committee's review.

87 ***The Leachables and Extractables Working Group***

88 Dr. Nagao reported that the date for the PQRI L&E Workshop has been set to 5-6 December.
89 The workshop will be held at the North Bethesda Marriott. A brief announcement has been
90 forwarded for dissemination to PQRI and member organizations. The teleconference
91 participants briefly discussed the possibility of holding a face-to-face DPTC meeting in
92 conjunction with the workshop.

93 Dr. Nagao further reported that the Working Group is finalizing Chemistry
94 Recommendations. A subgroup will meet next week to finish that work. After that, the
95 Chemistry and Toxicology parts of the PQRI L&E WG Recommendations will be combined
96 and hopefully provided for DPTC review in June.

97 ***The Excipients Working Group***

98 Mr. Wiens reported that the proposal for contracting the online survey services (circulated
99 earlier as a spreadsheet) has been approved by the SC and has been submitted to the Board of
100 Directors for final approval. The Board's answer is expected by Monday, 5/23.

101 Mr. Wiens indicated that the questionnaire would be reviewed by the full WG on 5/19, and
102 he requested a timely review and approval of the questionnaire by the DPTC and SC, so that
103 it could be published within the next five weeks or sooner. In response to a question, Mr.

104 Wiens clarified that the changes in the questionnaire pertain mostly to the distributor
105 questions. There are no major changes in the sections dealing with the manufacturers and
106 users of excipients. The participants agreed that the DPTC and SC reviews could proceed in
107 parallel, and could be conducted within 2 weeks.

108 **NEXT MEETING/TELECONFERENCE**

109 To be confirmed by email

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Finalized on 30 June 2005