CHPA

founded 1881

August 9, 2007 VIA FACSIMILE

Vasilios Frankos, Ph.D.
Center for Food Safety and Applied Nutrition (HFS-810)
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Re: Interim Final Rule on Petition to Request an Exemption from 100 Percent Identity Testing of Dietary Ingredients: Current Good Manufacturing Practice in Manufacturing, Packaging, Labeling, or Holding Operations for Dietary Supplements. 72 *Fed. Reg.* 34959-34969 (June 25, 2007). Docket No. 2007N-0186; RIN 0910-AB88

Dear Dr. Frankos:

The members of the Consumer Healthcare Products Association (CHPA) appreciate the opportunity to provide comments on the interim final rule (IFR) on petition to request an exemption from 100 percent identity testing for dietary ingredients. The June 25, 2007, *Federal Register* notice, indicated that FDA was allowing an opportunity for public comment on this IFR (72 *Federal Register* 34959-34969). CHPA, founded in 1881, is a national trade association representing manufacturers and distributors of dietary supplements and over-the-counter medicines.

CHPA and its members feel that additional time is needed to adequately respond to the *Fed. Reg.* notice and petition the FDA for an extension of the deadline to file comments on the IFR. We propose extending the deadline 60 days (*i.e.*, until November 26, 2007). Because the IFR becomes effective on August 24, 2007, regardless of any submissions on the issue, no harm should occur as a result of the Agency granting this request.

We appreciate FDA's willingness to consider our request and hope the Agency will grant our petition. Please feel free to contact me should you have any questions. We hope to hear from you soon.

Sincerely,

Marcia D. Howard

Marcia D. Howard, Ph.D.
Director, Regulatory & Scientific Affairs

MDH/07-17-07
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Consumer Healthcare Products Association
900 19th Street, NW, Suite 700
Washington, DC 20006
T 202.429.9260 F 202.223.6835
www.chpa-info.org