

# **Generic Drug Product Development**

## **Solid Oral Dosage Forms**

edited by  
Leon Shargel  
Isadore Kanfer

# Generic Drug Product Development Solid Oral Dosage Forms

**Leon Shargel**

*Eon Labs, Inc.*

*Wilson, North Carolina*

**Isadore Kanfer**

*Rhodes University*

*Grahamstown, South Africa*



MARCEL DEKKER

NEW YORK

Although great care has been taken to provide accurate and current information, neither the author(s) nor the publisher, nor anyone else associated with this publication, shall be liable for any loss, damage, or liability directly or indirectly caused or alleged to be caused by this book. The material contained herein is not intended to provide specific advice or recommendations for any specific situation.

Trademark notice: Product or corporate names may be trademarks or registered trademarks and are used only for identification and explanation without intent to infringe.

**Library of Congress Cataloging-in-Publication Data**

A catalog record for this book is available from the Library of Congress.

**ISBN: 0-8247-5460-3**

This book is printed on acid-free paper.

**Headquarters**

Marcel Dekker, Inc., 270 Madison Avenue, New York, NY 10016, U.S.A.  
tel: 212-696-9000; fax: 212-685-4540

**Distribution and Customer Service**

Marcel Dekker, Inc., Cimarron Road, Monticello, New York 12701, U.S.A.  
tel: 800-228-1160; fax: 845-796-1772

**World Wide Web**

<http://www.dekker.com>

The publisher offers discounts on this book when ordered in bulk quantities. For more information, write to Special Sales/Professional Marketing at the headquarters address above.

**Copyright © 2005 by Marcel Dekker, Inc. All Rights Reserved.**

Neither this book nor any part may be reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopying, microfilming, and recording, or by any information storage and retrieval system, without permission in writing from the publisher.

Current printing (last digit):

10 9 8 7 6 5 4 3 2 1

**PRINTED IN THE UNITED STATES OF AMERICA**

# Generic Drug Product Development

## Solid Oral Dosage Forms



科技阅览室



Y1902956

## DRUGS AND THE PHARMACEUTICAL SCIENCES

Executive Editor

**James Swarbrick**

*PharmaceuTech, Inc.  
Pinehurst, North Carolina*

### Advisory Board

Larry L. Augsburger  
*University of Maryland  
Baltimore, Maryland*

Harry G. Brittain  
*Center for Pharmaceutical Physics  
Milford, New Jersey*

Jennifer B. Dressman  
*Johann Wolfgang Goethe University  
Frankfurt, Germany*

Anthony J. Hickey  
*University of North Carolina School of  
Pharmacy  
Chapel Hill, North Carolina*

Jeffrey A. Hughes  
*University of Florida College of  
Pharmacy  
Gainesville, Florida*

Ajaz Hussain  
*U.S. Food and Drug Administration  
Frederick, Maryland*

Trevor M. Jones  
*The Association of the  
British Pharmaceutical Industry  
London, United Kingdom*

Hans E. Junginger  
*Leiden/Amsterdam Center  
for Drug Research  
Leiden, The Netherlands*

Vincent H. L. Lee  
*University of Southern California  
Los Angeles, California*

Stephen G. Schulman  
*University of Florida  
Gainesville, Florida*

Jerome P. Skelly  
*Alexandria, Virginia*

Elizabeth M. Topp  
*University of Kansas School of  
Pharmacy  
Lawrence, Kansas*

Geoffrey T. Tucker  
*University of Sheffield  
Royal Hallamshire Hospital  
Sheffield, United Kingdom*

Peter York  
*University of Bradford School of  
Pharmacy  
Bradford, United Kingdom*

## DRUGS AND THE PHARMACEUTICAL SCIENCES

A Series of Textbooks and Monographs

1. Pharmacokinetics, *Milo Gibaldi and Donald Perrier*
2. Good Manufacturing Practices for Pharmaceuticals: A Plan for Total Quality Control, *Sidney H. Willig, Murray M. Tuckerman, and William S. Hitchings IV*
3. Microencapsulation, *edited by J. R. Nixon*
4. Drug Metabolism: Chemical and Biochemical Aspects, *Bernard Testa and Peter Jenner*
5. New Drugs: Discovery and Development, *edited by Alan A. Rubin*
6. Sustained and Controlled Release Drug Delivery Systems, *edited by Joseph R. Robinson*
7. Modern Pharmaceutics, *edited by Gilbert S. Banker and Christopher T. Rhodes*
8. Prescription Drugs in Short Supply: Case Histories, *Michael A. Schwartz*
9. Activated Charcoal: Antidotal and Other Medical Uses, *David O. Cooney*
10. Concepts in Drug Metabolism (in two parts), *edited by Peter Jenner and Bernard Testa*
11. Pharmaceutical Analysis: Modern Methods (in two parts), *edited by James W. Munson*
12. Techniques of Solubilization of Drugs, *edited by Samuel H. Yalkowsky*
13. Orphan Drugs, *edited by Fred E. Karch*
14. Novel Drug Delivery Systems: Fundamentals, Developmental Concepts, Biomedical Assessments, *Yie W. Chien*
15. Pharmacokinetics: Second Edition, Revised and Expanded, *Milo Gibaldi and Donald Perrier*
16. Good Manufacturing Practices for Pharmaceuticals: A Plan for Total Quality Control, Second Edition, Revised and Expanded, *Sidney H. Willig, Murray M. Tuckerman, and William S. Hitchings IV*
17. Formulation of Veterinary Dosage Forms, *edited by Jack Blodinger*
18. Dermatological Formulations: Percutaneous Absorption, *Brian W. Barry*
19. The Clinical Research Process in the Pharmaceutical Industry, *edited by Gary M. Matoren*
20. Microencapsulation and Related Drug Processes, *Patrick B. Deasy*
21. Drugs and Nutrients: The Interactive Effects, *edited by Daphne A. Roe and T. Colin Campbell*
22. Biotechnology of Industrial Antibiotics, *Erick J. Vandamme*

23. *Pharmaceutical Process Validation*, edited by *Bernard T. Loftus and Robert A. Nash*
24. *Anticancer and Interferon Agents: Synthesis and Properties*, edited by *Raphael M. Ottenbrite and George B. Butler*
25. *Pharmaceutical Statistics: Practical and Clinical Applications*, *Sanford Bolton*
26. *Drug Dynamics for Analytical, Clinical, and Biological Chemists*, *Benjamin J. Gudzinowicz, Burrows T. Younkin, Jr., and Michael J. Gudzinowicz*
27. *Modern Analysis of Antibiotics*, edited by *Adjoran Aszalos*
28. *Solubility and Related Properties*, *Kenneth C. James*
29. *Controlled Drug Delivery: Fundamentals and Applications*, Second Edition, Revised and Expanded, edited by *Joseph R. Robinson and Vincent H. Lee*
30. *New Drug Approval Process: Clinical and Regulatory Management*, edited by *Richard A. Guarino*
31. *Transdermal Controlled Systemic Medications*, edited by *Yie W. Chien*
32. *Drug Delivery Devices: Fundamentals and Applications*, edited by *Praveen Tyle*
33. *Pharmacokinetics: Regulatory • Industrial • Academic Perspectives*, edited by *Peter G. Welling and Francis L. S. Tse*
34. *Clinical Drug Trials and Tribulations*, edited by *Allen E. Cato*
35. *Transdermal Drug Delivery: Developmental Issues and Research Initiatives*, edited by *Jonathan Hadgraft and Richard H. Guy*
36. *Aqueous Polymeric Coatings for Pharmaceutical Dosage Forms*, edited by *James W. McGinity*
37. *Pharmaceutical Pelletization Technology*, edited by *Isaac Ghebre-Sellassie*
38. *Good Laboratory Practice Regulations*, edited by *Allen F. Hirsch*
39. *Nasal Systemic Drug Delivery*, *Yie W. Chien, Kenneth S. E. Su, and Shyi-Feu Chang*
40. *Modern Pharmaceutics: Second Edition, Revised and Expanded*, edited by *Gilbert S. Banker and Christopher T. Rhodes*
41. *Specialized Drug Delivery Systems: Manufacturing and Production Technology*, edited by *Praveen Tyle*
42. *Topical Drug Delivery Formulations*, edited by *David W. Osborne and Anton H. Amann*
43. *Drug Stability: Principles and Practices*, *Jens T. Carstensen*

44. *Pharmaceutical Statistics: Practical and Clinical Applications, Second Edition, Revised and Expanded*, *Sanford Bolton*
45. *Biodegradable Polymers as Drug Delivery Systems*, *edited by Mark Chasin and Robert Langer*
46. *Preclinical Drug Disposition: A Laboratory Handbook*, *Francis L. S. Tse and James J. Jaffe*
47. *HPLC in the Pharmaceutical Industry*, *edited by Godwin W. Fong and Stanley K. Lam*
48. *Pharmaceutical Bioequivalence*, *edited by Peter G. Welling, Francis L. S. Tse, and Shrikant V. Dinghe*
49. *Pharmaceutical Dissolution Testing*, *Umesh V. Banakar*
50. *Novel Drug Delivery Systems: Second Edition, Revised and Expanded*, *Yie W. Chien*
51. *Managing the Clinical Drug Development Process*, *David M. Cocchetto and Ronald V. Nardi*
52. *Good Manufacturing Practices for Pharmaceuticals: A Plan for Total Quality Control, Third Edition*, *edited by Sidney H. Willig and James R. Stoker*
53. *Prodrugs: Topical and Ocular Drug Delivery*, *edited by Kenneth B. Sloan*
54. *Pharmaceutical Inhalation Aerosol Technology*, *edited by Anthony J. Hickey*
55. *Radiopharmaceuticals: Chemistry and Pharmacology*, *edited by Adrian D. Nunn*
56. *New Drug Approval Process: Second Edition, Revised and Expanded*, *edited by Richard A. Guarino*
57. *Pharmaceutical Process Validation: Second Edition, Revised and Expanded*, *edited by Ira R. Berry and Robert A. Nash*
58. *Ophthalmic Drug Delivery Systems*, *edited by Ashim K. Mitra*
59. *Pharmaceutical Skin Penetration Enhancement*, *edited by Kenneth A. Walters and Jonathan Hadgraft*
60. *Colonic Drug Absorption and Metabolism*, *edited by Peter R. Bieck*
61. *Pharmaceutical Particulate Carriers: Therapeutic Applications*, *edited by Alain Rolland*
62. *Drug Permeation Enhancement: Theory and Applications*, *edited by Dean S. Hsieh*
63. *Glycopeptide Antibiotics*, *edited by Ramakrishnan Nagarajan*
64. *Achieving Sterility in Medical and Pharmaceutical Products*, *Nigel A. Halls*
65. *Multiparticulate Oral Drug Delivery*, *edited by Isaac Ghebre-Sellassie*
66. *Colloidal Drug Delivery Systems*, *edited by Jörg Kreuter*

67. Pharmacokinetics: Regulatory • Industrial • Academic Perspectives, Second Edition, *edited by Peter G. Welling and Francis L. S. Tse*
68. Drug Stability: Principles and Practices, Second Edition, Revised and Expanded, *Jens T. Carstensen*
69. Good Laboratory Practice Regulations: Second Edition, Revised and Expanded, *edited by Sandy Weinberg*
70. Physical Characterization of Pharmaceutical Solids, *edited by Harry G. Brittain*
71. Pharmaceutical Powder Compaction Technology, *edited by Göran Alderborn and Christer Nyström*
72. Modern Pharmaceutics: Third Edition, Revised and Expanded, *edited by Gilbert S. Banker and Christopher T. Rhodes*
73. Microencapsulation: Methods and Industrial Applications, *edited by Simon Benita*
74. Oral Mucosal Drug Delivery, *edited by Michael J. Rathbone*
75. Clinical Research in Pharmaceutical Development, *edited by Barry Bleidt and Michael Montagne*
76. The Drug Development Process: Increasing Efficiency and Cost Effectiveness, *edited by Peter G. Welling, Louis Lasagna, and Umesh V. Banakar*
77. Microparticulate Systems for the Delivery of Proteins and Vaccines, *edited by Smadar Cohen and Howard Bernstein*
78. Good Manufacturing Practices for Pharmaceuticals: A Plan for Total Quality Control, Fourth Edition, Revised and Expanded, *Sidney H. Willig and James R. Stoker*
79. Aqueous Polymeric Coatings for Pharmaceutical Dosage Forms: Second Edition, Revised and Expanded, *edited by James W. McGinity*
80. Pharmaceutical Statistics: Practical and Clinical Applications, Third Edition, *Sanford Bolton*
81. Handbook of Pharmaceutical Granulation Technology, *edited by Dilip M. Parikh*
82. Biotechnology of Antibiotics: Second Edition, Revised and Expanded, *edited by William R. Strohl*
83. Mechanisms of Transdermal Drug Delivery, *edited by Russell O. Potts and Richard H. Guy*
84. Pharmaceutical Enzymes, *edited by Albert Lauwers and Simon Scharpé*
85. Development of Biopharmaceutical Parenteral Dosage Forms, *edited by John A. Bontempo*
86. Pharmaceutical Project Management, *edited by Tony Kennedy*

87. Drug Products for Clinical Trials: An International Guide to Formulation • Production • Quality Control, *edited by Donald C. Monkhouse and Christopher T. Rhodes*
88. Development and Formulation of Veterinary Dosage Forms: Second Edition, Revised and Expanded, *edited by Gregory E. Hardee and J. Desmond Baggot*
89. Receptor-Based Drug Design, *edited by Paul Leff*
90. Automation and Validation of Information in Pharmaceutical Processing, *edited by Joseph F. deSpautz*
91. Dermal Absorption and Toxicity Assessment, *edited by Michael S. Roberts and Kenneth A. Walters*
92. Pharmaceutical Experimental Design, *Gareth A. Lewis, Didier Mathieu, and Roger Phan-Tan-Luu*
93. Preparing for FDA Pre-Approval Inspections, *edited by Martin D. Hynes III*
94. Pharmaceutical Excipients: Characterization by IR, Raman, and NMR Spectroscopy, *David E. Bugay and W. Paul Findlay*
95. Polymorphism in Pharmaceutical Solids, *edited by Harry G. Brittain*
96. Freeze-Drying/Lyophilization of Pharmaceutical and Biological Products, *edited by Louis Rey and Joan C. May*
97. Percutaneous Absorption: Drugs–Cosmetics–Mechanisms–Methodology, Third Edition, Revised and Expanded, *edited by Robert L. Bronaugh and Howard I. Maibach*
98. Bioadhesive Drug Delivery Systems: Fundamentals, Novel Approaches, and Development, *edited by Edith Mathiowitz, Donald E. Chickering III, and Claus-Michael Lehr*
99. Protein Formulation and Delivery, *edited by Eugene J. McNally*
100. New Drug Approval Process: Third Edition, The Global Challenge, *edited by Richard A. Guarino*
101. Peptide and Protein Drug Analysis, *edited by Ronald E. Reid*
102. Transport Processes in Pharmaceutical Systems, *edited by Gordon L. Amidon, Ping I. Lee, and Elizabeth M. Topp*
103. Excipient Toxicity and Safety, *edited by Myra L. Weiner and Lois A. Kotkoskie*
104. The Clinical Audit in Pharmaceutical Development, *edited by Michael R. Hamrell*
105. Pharmaceutical Emulsions and Suspensions, *edited by Francoise Nielloud and Gilberte Marti-Mestres*
106. Oral Drug Absorption: Prediction and Assessment, *edited by Jennifer B. Dressman and Hans Lennernäs*

107. Drug Stability: Principles and Practices, Third Edition, Revised and Expanded, *edited by Jens T. Carstensen and C. T. Rhodes*
108. Containment in the Pharmaceutical Industry, *edited by James P. Wood*
109. Good Manufacturing Practices for Pharmaceuticals: A Plan for Total Quality Control from Manufacturer to Consumer, Fifth Edition, Revised and Expanded, *Sidney H. Willig*
110. Advanced Pharmaceutical Solids, *Jens T. Carstensen*
111. Endotoxins: Pyrogens, LAL Testing, and Depyrogenation, Second Edition, Revised and Expanded, *Kevin L. Williams*
112. Pharmaceutical Process Engineering, *Anthony J. Hickey and David Ganderton*
113. Pharmacogenomics, *edited by Werner Kalow, Urs A. Meyer, and Rachel F. Tyndale*
114. Handbook of Drug Screening, *edited by Ramakrishna Seethala and Prabhavathi B. Fernandes*
115. Drug Targeting Technology: Physical • Chemical • Biological Methods, *edited by Hans Schreier*
116. Drug-Drug Interactions, *edited by A. David Rodrigues*
117. Handbook of Pharmaceutical Analysis, *edited by Lena Ohannesian and Anthony J. Streeter*
118. Pharmaceutical Process Scale-Up, *edited by Michael Levin*
119. Dermatological and Transdermal Formulations, *edited by Kenneth A. Walters*
120. Clinical Drug Trials and Tribulations: Second Edition, Revised and Expanded, *edited by Allen Cato, Lynda Sutton, and Allen Cato III*
121. Modern Pharmaceutics: Fourth Edition, Revised and Expanded, *edited by Gilbert S. Banker and Christopher T. Rhodes*
122. Surfactants and Polymers in Drug Delivery, *Martin Malmsten*
123. Transdermal Drug Delivery: Second Edition, Revised and Expanded, *edited by Richard H. Guy and Jonathan Hadgraft*
124. Good Laboratory Practice Regulations: Second Edition, Revised and Expanded, *edited by Sandy Weinberg*
125. Parenteral Quality Control: Sterility, Pyrogen, Particulate, and Package Integrity Testing: Third Edition, Revised and Expanded, *Michael J. Akers, Daniel S. Larrimore, and Dana Morton Guazzo*
126. Modified-Release Drug Delivery Technology, *edited by Michael J. Rathbone, Jonathan Hadgraft, and Michael S. Roberts*
127. Simulation for Designing Clinical Trials: A Pharmacokinetic-Pharmacodynamic Modeling Perspective, *edited by Hui C. Kimko and Stephen B. Duffull*

128. Affinity Capillary Electrophoresis in Pharmaceuticals and Biopharmaceutics, *edited by Reinhard H. H. Neubert and Hans-Hermann Rüttinger*
129. Pharmaceutical Process Validation: An International Third Edition, Revised and Expanded, *edited by Robert A. Nash and Alfred H. Wachter*
130. Ophthalmic Drug Delivery Systems: Second Edition, Revised and Expanded, *edited by Ashim K. Mitra*
131. Pharmaceutical Gene Delivery Systems, *edited by Alain Rolland and Sean M. Sullivan*
132. Biomarkers in Clinical Drug Development, *edited by John C. Bloom and Robert A. Dean*
133. Pharmaceutical Extrusion Technology, *edited by Isaac Ghebre-Sellassie and Charles Martin*
134. Pharmaceutical Inhalation Aerosol Technology: Second Edition, Revised and Expanded, *edited by Anthony J. Hickey*
135. Pharmaceutical Statistics: Practical and Clinical Applications, Fourth Edition, *Sanford Bolton and Charles Bon*
136. Compliance Handbook for Pharmaceuticals, Medical Devices, and Biologics, *edited by Carmen Medina*
137. Freeze-Drying/Lyophilization of Pharmaceutical and Biological Products: Second Edition, Revised and Expanded, *edited by Louis Rey and Joan C. May*
138. Supercritical Fluid Technology for Drug Product Development, *edited by Peter York, Uday B. Kompella, and Boris Y. Shekunov*
139. New Drug Approval Process: Fourth Edition, Accelerating Global Registrations, *edited by Richard A. Guarino*
140. Microbial Contamination Control in Parenteral Manufacturing, *edited by Kevin L. Williams*
141. New Drug Development: Regulatory Paradigms for Clinical Pharmacology and Biopharmaceutics, *edited by Chandras G. Sahajwalla*
142. Microbial Contamination Control in the Pharmaceutical Industry, *edited by Luis Jimenez*
143. Generic Drug Product Development: Solid Oral Dosage Forms, *edited by Leon Shargel and Isadore Kanfer*
144. Introduction to the Pharmaceutical Regulatory Process, *edited by Ira R. Berry*

#### ADDITIONAL VOLUMES IN PREPARATION

Drug Delivery to the Oral Cavity: Molecules to Market, *edited by Tapash Ghosh and William R. Pfister*

---

## Preface

Early development and approval of generic drug products was associated with issues concerning safety, efficacy and therapeutic equivalence of such products compared to the innovator or brand-name drug product. Current development of generic drug products is based on sound scientific principles and processes to ensure that these drug products satisfy accepted standards for quality, safety and efficacy prior to obtaining marketing approval. However, the generic pharmaceutical industry is still challenged by legislative, regulatory and scientific issues that must be addressed to allow for the manufacture, approval and marketing of generic drug products.

The objectives of this textbook are to describe, from concept to market approval, the development of high quality, safe and efficacious solid oral generic drug products and to give a comprehensive account of the temporal and legal/regulatory considerations and associated processes from project initiation to marketing approval. The emphasis of this textbook is on the development of solid oral generic drug products. However, much of the material contained in this book may be applied to the development of other generic drug products.

Drug product development for the generic drug industry is different than that for the brand-name pharmaceutical industry. Generic drug product manufacturers must formulate a drug product that will have the same therapeutic efficacy and clinical performance as their brand-name counterpart. Moreover, generic drug product formulators have certain restraints in generic drug product development as well as regulatory and legal challenges that differ from those relating to the development of innovator or brand-name products.

The book initially explains the economic importance for developing therapeutic equivalent drug products and the various legislative and

regulatory issues surrounding the approval process. The reader is guided through the drug development process starting with a discussion on active pharmaceutical ingredients (API's), including their chemistry, patent issues, sourcing and requisite quality specifications and requirements followed by a comprehensive account of analytical method development and validation procedures. Later chapters provide a description of the formulation development process, scale-up, process validation, technology transfer and stability requirements. Quality control and quality assurance requirements for drug products are described along with the importance and utility of in vitro characterization and in vivo performance of solid oral dosage forms.

A comprehensive account of the Abbreviated New Drug Application (ANDA) approval process is discussed, including the organization of the U.S. Food and Drug Administration and ANDA review process. Bioequivalence is discussed in two separate chapters from both a regulatory and statistical perspective, respectively. A brief section of the bioequivalence requirements for generic drug products in Canada, Japan and the European Union is also included.

After market approval, the reader is exposed to issues on scale-up, post-approval changes and post-marketing surveillance. Since most bioequivalence studies are out-sourced, the book gives an account of the services provided by Contract Research Organizations (CRO's) including selection of a CRO, time and cost considerations, project management and the conduct of bioequivalence trials.

Finally, the book discusses legal and legislative hurdles to generic drug development, approval and marketing with an explanation of citizen petitions, exclusivity issues, suitability petitions and other legal matters.

The audiences for this book include undergraduate and graduate pharmacy students, pharmacy faculty, drug manufacturers and regulators in the pharmaceutical industry who are interested in generic drug development and need more information concerning drug product initiation, drug product formulation, biopharmaceutics, drug delivery, bioequivalence, regulatory and legislative issues. Emphasis is on practical information for the development of generic drug products. The text assumes that the reader has basic knowledge in pharmaceutical sciences and is interested in generic drug product development and manufacture.

**Leon Shargel, Ph.D.**

Vice President, Biopharmaceutics

Eon Labs Inc.

Wilson, NC, U.S.A.

Adjunct Associate Professor  
School of Pharmacy  
University of Maryland  
Baltimore, MD, U.S.A.

**Izzy Kanfer, Ph.D.**  
Professor of Pharmacy  
Dean & Head  
Faculty of Pharmacy  
Rhodes University,  
Grahamstown, South Africa

---

## Contributors

**Salah U. Ahmed** Research & Development, Barr Laboratories, Inc., Pomona, New York, U.S.A.

**Timothy W. Ames** Division of Labeling and Program Support, Office of Generic Drugs, Center for Drug Evaluation and Research, U.S. Food and Drug Administration, Rockville, Maryland, U.S.A.

**Karen A. Bernard** Chemistry Division II, Office of Generic Drugs, Center for Drug Evaluation and Research, U.S. Food and Drug Administration, Rockville, Maryland, U.S.A.

**Pranab K. Bhattacharyya** Quality Management and Analytical Services, Eon Labs, Inc., Laurelton, New York, U.S.A.

**Sanford Bolton** University of Arizona, Tuscon, Arizona, U.S.A.

**Sadie M. Ciganek** Regulatory Affairs, Eon Labs, Inc., Laurelton, New York, U.S.A.

**Edward M. Cohen\*** Business Development, Schein Pharmaceuticals, Inc., Danbury, Connecticut, U.S.A.

**Dale P. Conner** Division of Bioequivalence, Office of Generic Drugs, Center for Drug Evaluation and Research, U.S. Food and Drug Administration, Rockville, Maryland, U.S.A.

---

\*Current affiliation: EMC Consulting Services, Newtown, Connecticut, U.S.A.

**Barbara M. Davit** Division of Bioequivalence, Office of Generic Drugs, Center for Drug Evaluation and Research, U.S. Food and Drug Administration, Rockville, Maryland, U.S.A.

**Beth Fabian Fritsch** Division of Labeling and Program Support, Office of Generic Drugs, Center for Drug Evaluation and Research, U.S. Food and Drug Administration, Rockville, Maryland, U.S.A.

**Quanyin Gao** Watson Laboratories, Inc., Corona, California, U.S.A.

**Loren Gelber** Quality and Compliance, Andrx Pharmaceuticals, LIC, Davie, Florida, U.S.A.

**Ajaz S. Hussain** Office of Pharmaceutical Sciences, Center for Drug Evaluation and Research, U.S. Food and Drug Administration, Rockville, Maryland, U.S.A.

**Joan Janulis** Regulatory Affairs, Able Laboratories, Inc., Cranbury, New Jersey, U.S.A.

**Izzy Kanfer** Division of Pharmaceutics, Faculty of Pharmacy, Rhodes University, Grahamstown, South Africa

**Koung Lee** Division of Labeling and Program Support, Office of Generic Drugs, Center for Drug Evaluation and Research, U.S. Food and Drug Administration, Rockville, Maryland, U.S.A.

**Lih-Yang Lin<sup>†</sup>** Regulatory and Technology Division, ScinoPharm, San Matteo, California, U.S.A.

**Aruna J. Mehta** New Products, Eon Labs, Inc., Laurelton, New York, U.S.A.

**Frank J. Mellina** Eon Labs, Inc., Laurelton, New York, U.S.A.

**Venkatesh Naini** Schering-Plough Research Institute, Kenilworth, New Jersey, U.S.A.

**Patrick K. Noonan** PK Noonan & Associates, LLC, Richmond, Virginia, U.S.A.

**Larry A. Ouderkirk** Office of Pharmaceutical Sciences, Center for Drug Evaluation and Research, U.S. Food and Drug Administration, Rockville, Maryland, U.S.A.

**Peter Persicaner** Arrow Pharmaceuticals, Croydon, Victoria, Australia

---

<sup>†</sup> Deceased.