CHPA

founded 1881

March 23, 2007

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

Re: Docket No. 1998 N-0337C; RIN No. 0910-AD47: Proposed Rule on Labeling Requirements for Over-the-Counter Human Drugs; 71 *Fed. Reg.* 74474 (December 12, 2006)

Dear Sir or Madam:

On December 12, 2006, the Food and Drug Administration (FDA) issued a proposed rule on labeling requirements for over-the-counter (OTC) human drugs (71 Fed. Reg. 74474-74482). The announcement proposed a definition for "convenience size" OTC drug packages as well as the option of alternative labeling requirements for these products. The Consumer Healthcare Products Association (CHPA) welcomes the opportunity to comment on the proposed rule changes. Founded in 1881, CHPA is a national trade association representing manufacturers and distributors of OTC products and dietary supplements. Our membership represents approximately 90% of the OTC medicines sold in the United States.

Interested CHPA members are actively engaged in preparing their response to the December 12, 2006, *Fed. Reg.* notice. However, we believe additional time is needed to thoroughly determine the potential impact of the proposed changes and alternatives. We are, therefore, requesting the deadline submission be extended until May 29, 2007. The unusual number of additional days to submit the comments (*i.e.*, 48 days) takes into account that a 45-day period enters into the Memorial Day weekend and holiday.

We hope that the Agency is receptive to our request and grants the extension. Please feel free to contact me should you wish to discuss this matter. We look forward to hearing from you soon.

Sincerely,

David C. Spangler
Senior Vice President, Policy & International Affairs

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