



Commentary

USPNF 2026 ISSUE 5

March 27, 2026

In accordance with USP's *Rules and Procedures of the 2025-2030 Council of Experts (CoE Rules)*, and except as provided in Section 9.02 *Accelerated Revision Processes*, USP publishes proposed revisions to the *United States Pharmacopeia and the National Formulary (USP–NF)* for public review and comment in the *Pharmacopeial Forum (PF)*, USP's free bimonthly journal for public notice and comment. After comments are considered and incorporated as the Expert Committee (EC) deems appropriate, the proposal may advance to official status or be re-published in *PF* for further notice and comment, in accordance with the Rules. In cases when proposals advance to official status, a summary of comments received and the appropriate Expert Committee's responses, as well as Expert Committee-initiated changes, are published in the Proposal Status/Commentary section of USPNF.com at the time the official revision is published.

The *Commentary* is not part of the official text and is not intended to be enforceable by regulatory authorities. Rather, it explains the basis of Expert Committees' responses to public comments on proposed revisions. If there is a difference or conflict between the contents of the *Commentary* and the official text, the official text prevails.

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Comments were received for the following when they were proposed in Pharmacopeial Forum:

General Chapters

[MYCOPLASMA NUCLEIC ACID AMPLIFICATION TESTS <77>](#)

Monographs

[BACLOFEN COMPOUNDED ORAL SUSPENSION](#)

[CALCIUM WITH VITAMIN D CHEWABLE GELS](#)

[NICOTINAMIDE RIBOSIDE CHLORIDE](#)

[PROPANEDIOL](#)

[QUINIDINE SULFATE COMPOUNDED ORAL SUSPENSION](#)

No comments were received for the following proposals:

Monographs

KRILL OIL

PROPYLENE GLYCOL DICAPRYLATE/DICAPRATE

YELLOW WAX

General Chapter

General Chapter/Section(s): MYCOPLASMA NUCLEIC ACID AMPLIFICATION TESTS <77>

Expert Committee: General Chapters - Microbiology

No. of Commenters: 11

General comments

Comment Summary #1: The commenter indicated support for the inclusion of enrichment broths to enhance detection levels, the addition of definitions and guidelines for validating LOD, specificity, and robustness parameters, and the definition of a detection limit at 100 genome copies/mL (GC/mL) alongside the current 10 CFU/mL, suggesting that a GC-to-CFU ratio of ≤ 10 could serve as an acceptance criterion.

Response: Comment incorporated. Thank you for your support and suggestions regarding enrichment broths, validation guidelines, and detection limits. A GC-to-CFU ratio was added to the chapter.

Comment Summary #2: The commenter recommended that the new general chapter align with efforts in other pharmacopoeias regarding mycoplasma testing, specifically referencing PhEur 2.6.7 and JP G3-14-170, and noted that harmonized approaches benefit the industry.

Response: Comment not incorporated. While the value of harmonization across pharmacopoeias is recognized, this general chapter contains input from USP and FDA. *Japanese Pharmacopoeia* and *European Pharmacopoeia* chapters are not fully harmonized currently.

INTRODUCTION

Comment Summary #3: The commenter requested that the current names of genera and species within the Mollicutes class be used in Table 1, indicating that an update is required to reflect the most up-to-date nomenclature.

Response: Comment incorporated. The text has been updated to include the current names of genera within the Mollicutes class, and a note has been added to clarify that bacterial taxonomy and nomenclature are subject to change.

Comment Summary #4: The commenter indicated that the first sentence should use “*Mycoplasmas*” instead of “*Mycoplasma*” to reflect the appropriate context in the *Introduction* section.

Response: Comment incorporated. The first sentence in the *Introduction* section now uses “*Mycoplasmas*” as suggested.

Comment Summary #5: The commenter indicated that the chapter is not applicable to all parenteral products and proposed clarifying that it is intended for the validation and testing of qualitative nucleic acid amplification tests (NATs) for the detection of *Mycoplasma* contamination of cell cultures or any product derived from cell culture.

Response: Comment incorporated. Text is modified to read "This chapter is intended to be used for the validation and testing of qualitative nucleic acid amplification tests (NATs) for the detection of *Mycoplasma* contamination in biotechnological products and cell-based materials."

Comment Summary #6: The commenter indicated that the *Introduction* lacks precision regarding taxonomy, noting that only the genus *Mycoplasma* is mentioned. The commenter suggested adding a description of the Mollicutes class, including a list of its main genera. Additionally, the commenter noted that the genus *Mycoplasma* has been divided into several new genera (such as *Mycoplasma*, *Metamycoplasma*, and *Mesomycoplasma*), and recommended clarifying that “*Mycoplasma*” refers to all species within the Mollicutes class to avoid confusion.

Response: Comment incorporated. Sentences are added: "The term 'mycoplasma' is often used generically to refer to the class Mollicutes, which comprises genera such as *Mycoplasma*, *Mycoplasma*, *Mesomycoplasma*, *Metamycoplasma*, *Mycoplasma*, *Ureaplasma*, *Acholeplasma*, and *Spiroplasma*, among others. Importantly, the nomenclature of *Mycoplasma* and any other bacterial taxa is subject to change due to ongoing taxonomic research."

DESCRIPTION OF THE TECHNOLOGY

Comment Summary #7: The commenter indicated that NAT includes several mandatory steps, some or all of which may be automated, and suggested that these steps should be explicitly listed in the description of the technology. The proposed change clarifies that NATs for *Mycoplasma* DNA typically involve nucleic acid extraction and purification, amplification of targeted sequences, and detection of amplification, and notes that these steps can be performed manually or automatically in open or closed systems.

Response: Comment incorporated. The description has been updated to include the sentence "Further information on NAT technology is described in *Nucleic Acid-Based Techniques—Amplification <1127>*," as suggested, to clarify the steps involved in NATs for *Mycoplasma* DNA.

Comment Summary #8: The commenter suggested clarifying the *Description of the Technology* section by adding the word “contamination” after “NATs for *Mycoplasma* DNA,” noting that nucleic acid amplification tests are specifically designed for the detection of *Mycoplasma* DNA contamination. Additionally, the commenter recommended that “by the detection and amplification of target nucleic acid sequences” be changed to “by the amplification of target nucleic acid sequences,” as detection is already included in amplification in this context.

Response: Comment incorporated. The first sentence in the *Description of the Technology* section was revised as suggested to remove redundancy.

Comment Summary #9: The commenter suggested revising the first sentence in the *Description of the Technology* section to remove redundancy, specifically recommending that “by the detection and amplification of target nucleic acid sequences” be changed to “by the amplification of target nucleic acid sequences,” since detection is already included in amplification in this context.

Response: Comment incorporated. The content was revised to state "The presence or absence of mycoplasma in a sample may be inferred by NATs that amplify target nucleic acid sequences using specific primers and/or probes."

Comment Summary #10: The commenter suggested revising the last sentence of the *Description of the Technology* section to clarify that, while end users are typically responsible for selecting the most appropriate test, nucleic acid amplification technologies (NATs) may require further examinations depending on the intended use, as inexperienced users may not be able to determine the most suitable NAT.

Response: Comment incorporated. The text was revised to clarify that it is the end user's responsibility to select the most appropriate NAT for the intended use and to determine whether further validation testing is required.

User Requirements Specification

Comment Summary #11: The commenter indicated that considerations for limit of detection (LOD) were not addressed within the *User Requirements Specification* (URS) section and inquired whether there is a criterion that should be assessed prior to choosing a method.

Response: Comment not incorporated. The criteria for LOD and method suitability are already clearly stated, so no additional changes were made to the *User Requirements Specification* section.

Comment Summary #12: The commenter requested that bullet 2 in the *User Requirements Specification* section include the representative test sample volume analyzed per reaction during sample analysis, noting that the overall sensitivity of a nucleic acid test depends on factors such as input test sample volume, extraction efficiency, the amount of starting test sample analyzed per reaction, and the sensitivity of the detection method.

Response: Comment incorporated. The text was updated to specify the representative test sample volume analyzed per reaction.

Comment Summary #13: The commenter recommended that the *User Requirements Specification* clarify the LOD guidance by specifying the ability to detect at least 10 colony forming units/mL (CFU/mL) or at least 10 genome copies/mL (GC/mL) in test samples, rather than the draft's reference to 100 GC/mL. The commenter indicated that the LOD of 10 GC or CFU/mL is a globally recognized regulatory expectation, referencing *Ph. Eur.* 2.6.7, 2007, and noted that both the FDA and other regulatory bodies have accepted this standard following validation studies. The commenter expressed concern that relaxing the sensitivity guidance to 100 GC/mL would not be justified, as current methods and validation studies support the more stringent 10 GC/mL or 10 CFU/mL threshold. Additionally, the commenter highlighted the importance of specifying whether the LOD applies to test samples or test articles and described potential issues with *Mycoplasma* stock preparation and validation, emphasizing the need for clear guidance to avoid acceptance of stocks with disproportionate GC-to-CFU ratios.

Response: Comment partially incorporated. The *User Requirements Specification* has been updated to clarify the limit of detection guidance, aligning with global pharmacopoeia standards. However, the LOD threshold was not fully revised to 10 GC/mL or CFU/mL as suggested; instead, the specification maintains reference to 100 GC/mL, reflecting current validation practices. The rationale for this decision is to ensure consistency with established global standards while considering practical aspects of method validation. Further clarification has been added regarding the application of LOD to test samples, but not all recommendations regarding *Mycoplasma* stock preparation were incorporated.

Comment Summary #14: The commenter recommended defining suitable test articles in *User Requirements Specification* and indicated that, for test articles other than media or non-cell-based raw materials, samples should include both cells and supernatants when applicable to address the potential presence of closely cell-associated or intracellular contaminants. The commenter referenced the ongoing harmonization of global regulations and guidelines for biologics safety testing, specifically citing the revision of PhEur 2.6.7 and related updates.

Response: Comment incorporated. A *Sample Considerations* section is added, including the line "For product release testing, mycoplasma testing should be performed on cell culture harvest material (cells and supernatant) prior to further processing such as cell washing and DNA digest. Because these contaminants are intracellular or may adhere to cells, both cells and supernatant should be sampled for mycoplasma testing."

Sample Pretreatment

Comment Summary #15: The commenter indicated that the *Sample Pretreatment* paragraph lacks clarity and should be revised.

Response: Comment incorporated. A *Sample Considerations* section is now included.

Comment Summary #16: The commenter requested clarification that the criteria described in the *Sample Pretreatment* section refer to the limit of detection (LOD).

Response: Comment incorporated. Clarification was added to specify that the dilution should remain within the validated LOD, addressing the main concern of the comment.

Comment Summary #17: The commenter indicated that the current language in the *Sample Pretreatment* section regarding sample dilution is misleading and could result in false results during validation studies because it does not clearly state that dilution of the sample matrix prior to spiking the *Mycoplasma* positive control is not allowed. The commenter proposed revising the text to specify that any dilution or mitigation steps for samples with high host cell titer should occur only after spiking of the *Mycoplasma* positive controls, and to explicitly state that the sample should never be diluted prior to spiking.

Response: Comment partially incorporated. The language was clarified to specify that dilution should remain within the validated LOD. However, the proposed explicit statement that the sample should never be diluted prior to spiking was not fully adopted. This approach maintains flexibility while ensuring accuracy within validated parameters.

Comment Summary #18: The commenter requested clarification regarding the term "concentration" in the phrase "... sample concentration may be needed to achieve the required detection limit" within the *Sample Pretreatment* section, specifically asking whether it refers to cellular concentration and noting that *Mycoplasma Tests* <63> does not reference a detection limit related to sample concentration.

Response: Comment not incorporated. The wording is accurate as written, and no changes were made. The term "concentration" in this context is sufficiently clear, and the current language aligns with the intended meaning of the section.

Comment Summary #19: The commenter indicated that while there is no explicit requirement to isolate DNA from the sample, it is necessary to demonstrate that DNA from Mollicutes present on or within the test article has been successfully extracted and noted that existing techniques for depleting host cell DNA are already used to reduce interference with Mollicutes DNA detection.

Response: Comment incorporated. The language was updated to specify that the nucleic acid extraction method must isolate the DNA originating from mycoplasma cells from the test article.

Comment Summary #20: The commenter requested that the *Sample Pretreatment* section in *Nucleic Acid Amplification Test Method* specify the types of host cells used in monoclonal antibody production for which mitigation steps may be appropriate, suggesting the inclusion of examples such as CHO and NS0 cells.

Response: Comment not incorporated. While the suggestion to specify host cell types such as CHO and NS0 is appreciated, the section aims to remain inclusive of all potential new applications and cell lines. Listing specific examples could unintentionally limit the scope or exclude future developments.

Quality Controls

Comment Summary #21: The commenter recommended that the *Quality Controls* section more clearly define the quality controls used for primary method validation and method suitability when utilizing molecular technology to detect mycoplasma contamination. The commenter also requested clarification regarding the sentence, "The target nucleic acid for the assay control may be unique for one application if the assay and system have been previously validated with all the same controls that are required for the application," and noted the importance of specifying the types of quality controls, such as viable or inactivated *Mycoplasma* strains or target nucleic acids.

Response: Comment partially incorporated. The requested sentence was removed, and an *Assay Controls* section was added to address the need for clarity regarding quality controls. No further changes were made to specify the types of quality controls, as the new section provides the necessary clarification.

Comment Summary #22: The commenter recommended adding a requirement in the *Quality Controls* section to quantify viable reference strains, specifically to determine titer in CFU/mL before freezing and measuring the GC-to-CFU ratio. The commenter suggested that the acceptance criterion for this ratio should align with PhEur 2.6.7, noting that “the GC/CFU ratio should be as low as possible.” Additionally, the commenter expressed concern that the current instruction in the *Method Suitability Test* to use viable or inactivated *Mycoplasma* or target nucleic acid at ≤10 CFU/mL or 100 GC/mL prior to sample pretreatment may lead to limited recovery, especially when using genomic DNA. The commenter proposed allowing higher concentrations—up to 10,000 GC/mL—to improve detection for certain strains.

Response: Comment incorporated. The requirement for quantifying viable reference strains in the *Quality Controls* section (changed to *Test Strains*) has been added, which includes the determination of titer in CFU/mL prior to freezing and measurement of the GC-to-CFU ratio. The acceptance criterion now specifies that the GC-to-CFU ratio of the reference preparations should be no more than 10, unless otherwise justified, in alignment with PhEur 2.6.7 and reported literature.

Comment Summary #23: The commenter recommended that the *Quality Control* section specify that genomic DNA should be sourced from seed-lot or master seed bacterial cultures that are not more than five passages removed from the original master seed-lot. The proposed change is intended to provide clarity and promote consistent testing parameters.

Response: Comment not incorporated. The recommendation was reviewed and found to be aligned with existing guidance (*Mycoplasma Tests* <63>), so no additional specification was added to the *Quality Control* section. The current language is considered sufficient to ensure clarity and consistency in testing parameters.

Comment Summary #24: Commenters requested clearer, technology-appropriate quality control guidance. They urged the section to distinguish between open and closed or fully automated NAT systems, allow system-specific internal controls, and more precisely define QC elements for primary validation and method suitability. The commenters also requested that the section clarify wording on when unique nucleic acid controls are acceptable and specify the types of viable, inactivated, or surrogate materials that may be used.

Response: Comment incorporated. The section on assay controls has been updated to reference *Nucleic Acid-Based Techniques—Amplification* <1127> and now provides a more generic approach, allowing for flexibility in QC procedures based on the level of technology used, including provisions for closed and fully automated systems. A new *Assay Controls* section was added.

Comment Summary #25: The commenter indicated that the specified storage temperature of –20°C is not sufficient for the long-term storage of positive control strains in the *Quality Controls* section and proposed revising the requirement to deep frozen storage at –60° to –90°C.

Response: Comment not incorporated. The current specification of –20°C is considered more inclusive to stakeholders and may be revised in the future if needed.

Comment Summary #26: The commenter recommended restricting the use of colony-forming units (CFU) and the GC-to-CFU ratio to viable cultures only in the *Quality Controls* section, noting that CFU measurements cannot be substantiated with inactivated strains or target nucleic acids.

Response: Comment partially incorporated. The text was updated to note that inactivated *Mycoplasma* cells should be characterized for their genome copies. and "The GC-to-CFU ratio of the reference preparations should be no more than 10, unless otherwise justified".

Primary Method Validation

Comment Summary #27: The commenter indicated that the importance assigned to vendor validation data in the *Primary Validation* section may not be appropriate or sufficiently balanced.

Response: Comment not incorporated. Vendors could make this information publicly accessible or, at a minimum, provide the validation details through a Drug Master File. The chapter states that “it is the end user’s responsibility to verify that the validation criteria are appropriate for the intended use”.

Comment Summary #28: The commenter recommended that the *Primary Method Validation* section include ruggedness and repeatability as validation criteria, noting that for qualitative tests, criteria such as specificity, limit of detection, robustness, repeatability, ruggedness, and equivalency are outlined in *Validation of Alternative Microbiological Methods <1223>*. The commenter indicated that the current general chapter does not mention ruggedness or repeatability and suggested that samples should be tested under typical conditions using different analysts, instruments, and reagent lots.

Response: Comment partially incorporated. The *Robustness* section was updated to specify "parameters (e.g., reagent concentrations and lots, reaction volume, etc.)" as suggested. However, the recommendation to explicitly include ruggedness and repeatability as separate validation criteria in the *Primary Method Validation* section was not fully adopted. This approach was taken to maintain alignment with the current structure and focus of the general chapter.

Comment Summary #29: The commenter requested clarification or examples regarding the definition of a comparable matrix in the *Primary Method Validation* section, specifically asking whether this refers to the type of cell, concentration, or other factors.

Response: Comment not incorporated. The request for clarification or examples regarding the definition of a comparable matrix was not accepted, as providing a specific definition may be too broad or exclusive given the variability in user experience and assay types.

Comment Summary #30: The commenter recommended that sample pretreatment, including concentration and dilution steps, be added to the list of parameters considered during *Primary Method Validation*, noting that these steps may impact NAT results.

Response: Comment not incorporated. The suggested addition is not necessary, as sample pretreatment steps such as concentration and dilution are already addressed under *Method Suitability Test*.

Comment Summary #31: The commenter indicated that the phrase "for each dilution" in the limit of detection (LOD) section should be removed to improve clarity, as it does not align with the example provided. The commenter explained that the total number of replicates should be 24 across all dilutions, not for each dilution, and proposed revised wording to reflect this clarification. Additionally, the commenter requested clarification regarding the rationale for requiring a total of 24 test results for each dilution.

Response: Comment not incorporated. A sufficient number of replicates per dilution is required to allow sufficient confidence in the positive cut-off point that is to be determined. Requiring 24 replicates across all dilutions would mean that if three dilutions were tested only 8 replicates per dilution would be considered; this is considered too low.

Comment Summary #32: The commenter requested clarification regarding whether plasmid continues to function as a quality control measure in the *Amplification and detection* section.

Response: Comment not incorporated. The requested clarification is no longer relevant due to changes in the text.

Comment Summary #33: The commenter requested clarification on whether the reference to "the stability of the sample preparations" in robustness testing implies that sample hold-time studies are required in the *Primary Method Validation* section.

Response: Comment not incorporated. The requested clarification is not within the scope of this general chapter and will be addressed in a future "frequently asked questions" section.

Comment Summary #34: The commenter indicated that robustness is not an ICH requirement for qualitative tests according to the recently revised ICH Q2/Q14 and requested that the *Robustness* section in *Primary Method Validation* either be removed or updated to align with the updated ICH guidelines, specifically regarding the use of development data to determine analytical procedure suitability.

Response: Comment partially incorporated. The *Robustness* section was updated to clarify that it refers to parameters such as reagent concentrations and lots, reaction volume, etc. The section was not removed, as robustness remains relevant for method validation, but the language now aligns better with the updated ICH guidelines.

Comment Summary #35: The commenter requested clarification on why the limit of detection (LOD) is set at not more than 10 CFU/mL, noting that this differs from the standard specified in *Mycoplasma Tests <63>*.

Response: Comment not incorporated. The limit of detection (LOD) is not defined in *Mycoplasma Tests* <63>, and the methods in question are not directly comparable, so no changes were made in response to this comment.

Comment Summary #36: The commenter requested that Table 1 include information noting that the *M. pneumoniae* strain FH grows in aggregates and that its higher GC content is justified when the limit of detection (LOD) is 10 CFU/mL.

Response: Comment not incorporated. Literature shows that for *M. pneumoniae*, a CFU-to-GC ratio of less than 10 is achievable with optimization of cultural and harvest conditions. Therefore, additional clarification in Table 1 is not considered necessary.

Comment Summary #37: The commenter recommended that, for *Primary Method Validation*, the use of purified *Mycoplasma* DNA be included for limit of detection (LOD) testing in DNA-based detection methods, in addition to live or inactivated *Mycoplasma* strains. The commenter also suggested adding an assessment of the detection method's range, noting that LOD testing with accurately quantitated purified DNA provides a more precise measure of method sensitivity and offers reference cycle threshold values for end users. The commenter emphasized the importance of validating assay range to ensure accurate results in both low and highly contaminated samples and proposed an alternative validation study design aligned with ICH Q2 guidance, requiring 24 test results per species to meet a 95% positive result criterion. The commenter further recommended aligning guidance with *Validation of Alternative Microbiological Methods* <1223> regarding the use of reference materials and noted that certain statistical approaches, such as Probit analysis, may be necessary for non-quantitative methods.

Response: Comment not incorporated. The general chapter's purpose is to determine presence or absence, not to quantify, so recommendations related to LOD testing with purified DNA, assay range validation, and specific statistical approaches were not adopted.

Comment Summary #38: The commenters requested that the *Comparability Study* section clarify that comparability studies are not applicable when inactivated mycoplasma or target nucleic acids, such as DNA controls, are used for mycoplasma NAT assay validation, since these studies require viable *Mycoplasma* species. The proposed change suggests adding a statement to specify that comparability studies require viable organisms and are therefore not applicable in cases involving inactivated strains or nucleic acid controls and recommends contacting regulatory agencies for further guidance.

Response: Comment not incorporated. This chapter is exclusively about NAT. Additional wording is not considered necessary.

Comment Summary #39: The commenter requested clarification in the LOD section regarding whether a dilution series refers to a range of concentrations (such as 1 CFU/mL, 10 CFU/mL, 100 CFU/mL) or to multiple replicates at a single inoculum level (for example, 10 CFU/mL A, B, and C), noting that additional clarity on this point would be helpful.

Response: Comment not incorporated. The requested clarification will not be added to the LOD section, but the issue will be addressed in a future "frequently asked questions" section to provide further guidance.

Comment Summary #40: The commenter requested that the section on specificity include specific examples of Gram-positive bacteria with close phylogenetic relation to *Mycoplasma*, such as *Clostridium*, *Lactobacillus*, and *Streptococcus*, while noting that this list is not exhaustive and that the species selected for testing should be based on the theoretical detection capability of the NAT system.

Response: Comment not incorporated. The section was not revised to include specific examples of Gram-positive bacteria, as the selection of species for specificity testing depends on the PCR sequence target and test method. Including a fixed list may not be appropriate for all NAT systems, so the guidance remains general to allow flexibility based on the theoretical detection capability.

Table 1

Comment Summary #41: The commenter indicated that Table 1 includes only non-cultivable strains (Mha) and questioned the inclusion of one arginine metabolism and three glutamine

metabolism entries. The commenter also asked why both *M. fermentans* and *M. pneumoniae* are listed when reference *Mycoplasma Tests* <63> states they are interchangeable.

Response: Comment not incorporated. The selection of *Mycoplasma* strains aligns with the current *Mycoplasma Tests* <63> and other major pharmacopoeias, such as PhEur 2.6.7, and considers the most relevant species of mycoplasmas based on the application's contamination risk.

Comment Summary #42: The commenter recommended several updates to Table 1, including amending the text to permit the use of target nucleic acids derived from field isolates, adding a footnote to allow equivalent *Mycoplasma* strains and their nucleic acids, and including a "fastidious" strain of *M. hyorhinae* (DBS 1050) for NAT methods with cell-culture enrichment, consistent with the *European Pharmacopoeia*. The commenter also suggested allowing alternatives such as *S. melliferum* and *S. ixodetis* for testing insect and plant material due to restrictions on *S. citri*.

Response: Comment not incorporated. The sentence is correct as is. The suggested updates to Table 1 were not adopted because the current text accurately reflects the intended requirements and scope which states that the test strains may also be field isolates. This chapter is generally not intended to be coupled with a growth-based method.

Comment Summary #43: The commenter requested that Table 1 be revised for greater clarity. The commenter indicated that the current structure of Table 1 may result in certain strains being excluded from validation studies and expressed concern that the application column would be used to justify reducing the required number of *Mycoplasma* species for validation.

Response: Comment incorporated. The title of Table 1 was changed to "Mycoplasma Strains as per Application" for improved clarity. The primary validation bullet points now specify that a broad range of *Mycoplasma* species must be tested, referencing Table 1 as the minimum requirement. Method suitability instructions were updated to clarify that the test should use mycoplasma strains listed in Table 1 and/or field isolates if applicable, and that all application-specific test strains must be evaluated.

Comment Summary #44: The commenter indicated that the *Mycoplasma* strains listed in Table 1 are suitable for use in method validation and method suitability testing and noted that the referenced chapter <63> does not require their use.

Response: Comment incorporated. The title of Table 1 was updated to "Mycoplasma Strains as per Application," and relevant bullet points and instructions were revised to clarify the use of these strains for validation and method suitability testing.

Comment Summary #45: The commenter requested that the *Mycoplasma* strains listed in Table 1 be presented as examples rather than as an exhaustive or prescriptive list.

Response: Comment partially incorporated. The title of Table 1 was revised to "Mycoplasma Strains as per Application" to clarify its purpose, and language was added to indicate that a broad range of *Mycoplasma* species should be tested, including those in Table 1 in the *Primary Method Validation* and *Method Suitability Test* sections to conduct the testing using Table 1 strains. Table 1 remains a reference for application-specific tests.

Comment Summary #46: The commenter requested that the current names of genera and species within the Mollicutes class be used in Table 1, indicating that an update is required to reflect the most up-to-date nomenclature.

Response: Comment incorporated. The text has been updated to include the current names of genera within the Mollicutes class, and a note has been added to clarify that bacterial taxonomy and nomenclature are subject to change.

Comment Summary #47: The commenter recommended clarifying that the *Mycoplasma* strains listed in Table 1 are representative examples and that other strains may be tested based on a risk analysis.

Response: Comment partially incorporated. The title of Table 1 was updated to "Mycoplasma Strains as per Application" to clarify its relevance to specific applications, and language was added to indicate that a broad range of *Mycoplasma* species should be tested at minimum. However, the suggestion to explicitly state that other strains may be tested based on a risk analysis was not fully incorporated; instead, the *Method Suitability Test* section notes that field

isolates may be used if applicable. This approach maintains flexibility while providing clarity about the strains required for testing.

Comment Summary #48: The commenter requested that *Spiroplasma citri* be referenced with its type strain, ATCC 27556, in Table 1.

Response: Comment not incorporated. The ATCC strain for *Spiroplasma citri* is already listed in Table 1, so no further changes were necessary.

Comment Summary #49: The commenter requested that Table 1 reference the type strain for *M. arginini* as ATCC 23838.

Response: Comment not incorporated. The ATCC strain for *M. arginini* is already listed in Table 1, so no further changes are necessary.

Comment Summary #50: The commenter requested clarification in Table 1 regarding method suitability testing for vaccines and cell-derived materials produced with antibiotics. Specifically, the commenter indicated it is unclear whether *Acholeplasma laidlawii* should be used exclusively for cells cultivated with antibiotics, or in addition to other strains listed for cells cultivated without antibiotics and recommended that the table be revised to clarify this point.

Response: Comment not incorporated. The table will remain as is to align with *Mycoplasma Tests* <63>.

Method Suitability Test

Comment Summary #51: The commenter requested clarification of the statement referring to inoculation in the presence and absence of the test article, questioning the rationale for mentioning inoculated broth (should be “both”) and whether this language implies the use of a hybrid (culture-based and non-culture-based) assay.

Response: Comment partially incorporated. The content was revised to state “inoculated in the presence of the test article or material,”.

Comment Summary #52: The commenter requested deleting the words “and absence” from the *Method Suitability Test* section and clarifying the statement that “the method suitability test may be relevant for multiple applications.” The commenter indicated that for method suitability testing, it is sufficient to demonstrate the assay’s ability to exclude any matrix impact and suggested that the current language may be unclear or unnecessarily broad.

Response: Comment incorporated. The content has been modified to clarify that the suitability of the test must demonstrate appropriate detection of the challenge mycoplasma or genetic material in the presence of product, verifying lack of interference with the test. The revised language addresses the commenter’s concerns by focusing on matrix impact and removing the words “and absence” as requested.

Comment Summary #53: The commenter recommended that inactivated strains used in the *Method Suitability Test* be characterized by genomic copies per milliliter, noting that viable, inactivated, or target nucleic acid are permitted, provided their concentration does not exceed 10 CFU/mL or 100 GC/mL.

Response: Comment incorporated. The content was modified to specify that *Mycoplasma* culture strains, whether viable or inactivated, should be enumerated and characterized for genome copies, including their GC-to-CFU ratio.

Comment Summary #54: The commenter requested clarification regarding whether plasmid continues to function as a quality control measure in the *Amplification and detection* section.

Response: Comment not incorporated. The requested clarification is no longer relevant due to changes in the text.

Comment Summary #55: The commenter requested clarification regarding the meaning of “multiple application” in the *Method Suitability Test*.

Response: Comment incorporated. The content has been modified to clarify that the method suitability test should use *Mycoplasma* strains specified in the application, as per Table 1, and to note that the method suitability test may be relevant for multiple applications requiring all the application-specific test strains.

Comment Summary #56: Multiple commenters requested revision of the *Method Suitability Test* requirements to clarify the rationale for including three test strains, to align with Ph. Eur. 2.6.7, and to emphasize a risk-based selection of *Mycoplasma* species based on factors such

as manufacturing process, product type, and contamination history, while clarifying that the strains listed in Table 1 are representative examples and that additional application-specific strains may be evaluated based on risk analysis.

Response: Comment incorporated. The content was revised to state “Conduct the method suitability test using mycoplasma strains as per Table 1 and/or field isolates if applicable. Note, the method suitability test may be relevant for multiple applications requiring that all application-specific test strains are evaluated.”

Comment Summary #57: The commenter requested clarification in the *Briefing* section regarding whether method suitability requires testing with no fewer than three strains—selected and justified by application and risk assessment—or if all organisms listed in Table 1 by application must be included. The commenter noted that the general chapter currently specifies the use of organisms by application rather than a minimum number of test strains.

Response: Comment not incorporated. The Expert Committee determined that this information is beyond the scope of this general chapter.

Comment Summary #58: The commenter recommended adding a requirement in the *Quality Controls* section to quantify viable reference strains, specifically determining titer in CFU/mL before freezing and measuring the GC-to-CFU ratio. The commenter suggested that the acceptance criterion for this ratio should align with PhEur 2.6.7, noting that “the GC-to-CFU ratio should be as low as possible.” Additionally, the commenter expressed concern that the current instruction in the *Method Suitability Test* to use viable or inactivated *Mycoplasma* or target nucleic acid at ≤ 10 CFU/mL or 100 GC/mL prior to sample pretreatment may lead to limited recovery, especially when using genomic DNA. The commenter proposed allowing higher concentrations—up to 10,000 GC/mL—to improve detection for certain strains.

Response: Comment incorporated. The requirement for quantifying viable reference strains in the *Quality Controls* section (changed to “Test Strains”) has been added, which includes the determination of titer in CFU/mL prior to freezing and measurement of the GC-to-CFU ratio. The acceptance criterion now specifies that the GC-to-CFU ratio of the reference preparations should be not more than 10, unless otherwise justified, in alignment with PhEur 2.6.7 and reported literature.

Comment Summary #59: The commenter requested clarification regarding the use of plasmid DNA as a MycoSEQ DPC in the *Method Suitability Test*.

Response: Comment not incorporated. Clarification is not necessary because the current text aligns with PhEur 2.6.7.

Comment Summary #60: The commenter requested that the *Method Suitability Test* section include examples of neutralizing agents in the sentence addressing assay interference and the need for suitable neutralization during suitability and microbial detection tests.

Response: Comment incorporated. The content was modified to say that “If the product to be examined interferes with the assay, carry out the suitability test after suitable mitigation. ” Additional information will be provided in a future “frequently asked questions” section.

Test for Mycoplasma in the Test Sample

Comment Summary #61: The commenter recommended that for automated closed systems, the test for *Mycoplasma* in the test sample be conducted after completing any necessary sample treatment steps and that the procedure follow the recommendations provided by the test kit manufacturer.

Response: Comment incorporated. The guidance now states: “Conduct nucleic acid extraction and purification steps after completing any necessary sample pretreatment steps,” aligning with the recommendation to perform testing after sample treatment and to follow the test kit manufacturer’s instructions.

Comment Summary #62: The commenter requested clarification on whether the outlined scheme for the *Mycoplasma* test should be applied to routine testing and whether all assay controls are necessary for routine testing of samples that have already undergone validation.

Response: Comment partially incorporated. Table 2 was removed to address concerns about the outlined scheme for the *Mycoplasma* test. However, not all aspects of the comment were incorporated, as further clarification regarding the necessity of all assay controls for routine testing was not added. The main change focused on streamlining the information presented.

Comment Summary #63: The commenter recommended adding a *Test Sample* section above the *Sample Volume* section in the *Test for Mycoplasma*, to emphasize the importance of testing at appropriate sampling timepoints during manufacturing. The commenter also recommended defining suitable test articles in *User Requirements Specifications* and noted that, for test articles other than media or non-cell-based raw materials, samples should include both cells and supernatants when applicable to address the potential presence of closely cell-associated or intracellular contaminants. Additionally, the commenter referenced ongoing harmonization of global regulations and guidelines for biologics safety testing, specifically citing the revision of PhEur 2.6.7 and related updates.

Response: Comment partially incorporated. The section on product release testing was revised to specify that *Mycoplasma* testing should be performed on cell culture harvest material (cells and supernatant) prior to further processing such as cell washing and DNA digest. Additional language from the *European Pharmacopeia* was included to address the potential for contaminants to adhere to or be present in cells. Because these contaminants may be intracellular or closely associated with cells, both cells and supernatant should be sampled for *Mycoplasma* testing. However, the recommendation to add a separate *Test Sample* section and broader guidance on testing throughout the manufacturing process were not fully adopted. Sponsors are encouraged to consult regulatory agencies for further guidance as needed.

Comment Summary #64: The commenter indicated that not all commercially available PCR kits may include all the listed controls but can still be suitable and compliant for mycoplasma DNA detection and they requested clarification. The commenter proposed revising the language to specify that the listed assay controls are examples by adding “e.g.” to the statement.

Response: Comment incorporated. An *Assay Controls* section was added to clarify the use of basic controls needed for the validity of the assay.

Comment Summary #65: The commenter requested clarification regarding the purpose of the extraction negative control in the *Amplification and detection* section.

Response: Comment partially incorporated. The request for clarification regarding the purpose of the extraction negative control in the *Amplification and detection* section was addressed in the *Assay Controls* section.

Comment Summary #66: The commenter requested clarification regarding whether plasmid continues to function as a quality control measure in the *Amplification and detection* section.

Response: Comment not incorporated. The requested clarification is no longer relevant due to changes in the text.

Comment Summary #67: The commenter indicated that positive and negative controls are missing for the sample pretreatment steps in the *Amplification and detection* section, such as centrifugation and dilution, and suggested including controls like a *Mycoplasma*-spiked sample near the limit of detection and a general matrix without *Mycoplasma* to be tested alongside the samples.

Response: Comment not incorporated since the *Assay Controls* section was generalized to include a higher number of NAT systems.

Comment Summary #68: The commenter requested that the section on *Primary Method Validation* include examples of neutralizing agents in the sentence addressing assay interference and the need for suitable neutralization during suitability and microbial detection tests.

Response: Comment incorporated. The text was updated to include examples of neutralizing agents, and additional information will be provided in an FAQ.

Comment Summary #69: The commenter requested that every solution, which requires an enrichment step, including nucleic acid amplification tests (NAT) should consider the safety margin as outlined in *Respiration-Based Microbiological Methods for the Detection of Contamination in Short-Life Products <72>*. The proposed change adds that, in cases of culture enrichment, validation data must support the time required to reach the detection limit, including a safety margin.

Response: Comment not incorporated. The suggested change was not accepted because the direct detection method does not involve a pre-enrichment step which is not directly related to the limit of detection (LOD) in this context.

Comment Summary #70: The commenter indicated that the sentence, “This detection kit is often available from the same manufacturer that provides the amplification or detection kit and is integral to their validation but may not be required,” in the *Nucleic acid extraction and purification* section is confusing and recommended its deletion.

Response: Comment incorporated. The sentence was deleted as recommended to improve clarity.

Comment Summary #71: The commenter indicated that it is important to emphasize the differences between closed system nucleic acid amplification tests and other open solution NAATs, regardless of their automation level, noting that risk management for closed systems is directly tied to the system and should be addressed by the provider through quality control procedures that may differ from those described in the initial text of general chapter <77>.

Response: Comment incorporated. The text was modified to clarify the role of basic PCR controls and to emphasize that other controls relevant to unique aspects of the manufacturer's kit should be considered. The bullet points and Table 2 were removed to streamline the content and better address the distinctions between closed system nucleic acid amplification tests and other open solution NAATs, as suggested. A new *Assay Controls* section was added to the general chapter.

Table 2

Comment Summary #72: The commenter indicated that Table 2 is confusing, specifically questioning whether extraction inhibition controls are intended to contain extraction and purification reagents, test sample, and target nucleic acids. The commenter requested that the table be redesigned to clarify these requirements and suggested that if extraction is not addressed in the general chapter, it should be removed from the table.

Response: Comment not incorporated. Table 2 was removed. A new *Assay Controls* section was added to allow for higher inclusion of methods.

Comment Summary #73: The commenter requested adding a note to Table 2 to clarify that, for closed and fully automated systems, internal controls based on other surrogates may be used to ensure the proper functioning of all steps, including extraction to amplification.

Response: Comment not incorporated. Table 2 was removed, so the requested note was not added. However, the feedback regarding internal controls for closed and fully automated systems will be considered in future revisions or relevant sections.

Comment Summary #74: The commenter recommended adding a footnote below Table 2 to clarify the meaning of the "+" and "-" symbols used for assay controls, proposing specific language to indicate that "(+)" means the component is included and "(-)" means the component is not included.

Response: Comment not incorporated. Refer to the response to Comment Summary #73.

Monographs

Monograph/Section(s):	BACLOFEN COMPOUNDED ORAL SUSPENSION
Expert Committee:	Compounding
No. of Commenters:	1

Comment Summary #1: A commenter notes the 5 mg/mL formulas in this compounded monograph may produce a compounded drug product that is essentially a copy of an FDA-approved drug product. They recommend using only FDA-approved drug products unless the patient has a specific medical need that cannot be met by the approved drug products. Because compounded drug products do not go through the drug approval process, they should only be used when an FDA-approved drug product is not available to meet the medical needs of an individual patient. As stated in FDA Guidance for Industry 503A regarding drug copies, a drug

product is not considered to be commercially available if it appears on the FDA Drug Shortage list; however, Baclofen Oral Suspension is not currently listed on the FDA Drug Shortage list.

Response: Comment not incorporated. This monograph is being published to provide compounders with a preparation to compound when it is lawful to do so, such as when the product appears on the FDA Drug Shortage list.

Comment Summary #2: A commenter expresses concern that using letters (e.g., A and B) to distinguish the different vehicles in each formula will lead to confusion for compounders. For clarity and to minimize confusion, we recommend USP consider revising the format throughout the monograph to distinguish each preparation accordingly (or use some other similar formatting method).

Response: Comment not incorporated. This formulation was removed from the monograph. It is important to note that when there are different *Vehicles* used in a monograph, labeling them using letters (e.g., A and B) is consistent with the *USP Monograph Style Guide*.

Comment Summary #3: A commenter notes when this monograph was reviewed in November 2023, the Compounding Expert Committee removed the formulation that included the Tablets dosage form (i.e., formula containing Vehicle A) and only approved and balloted the formulations containing Vehicle B. They recommend USP consider this discrepancy when publishing this compounded monograph as to be official in the compendium.

Response: Comment incorporated. When the Monograph Development Subcommittee (MDSC) of the CMP EC forwarded the monograph to the CMP EC for their notification about its upcoming proposal in *Pharmacopeial Forum*, the MDSC's intent was for the monograph revision to be proposed without the referenced formulation (including Vehicle A). The referenced formulation and all related language were removed.

DEFINITION

Comment Summary #4: A commenter recommends USP consider adding a clarifying statement that compounders will need to prepare the vehicles identified in the formula containing *Vehicle A* and should refer to the formulas and preparation instructions contained in each respective *USP-NF* monograph. Additionally, they recommend USP consider revising these instructions to be consistent with current standards for new compounding monograph development, similar to the language used in the instructions for the formula containing *Vehicle B*.

Response: Comment not incorporated. This formulation was removed from the monograph. See the response to comment summary #3.

Comment Summary #5: A commenter notes there is no manufacturer referenced for the Tablets dosage form and it's unclear if the respective vehicles were tested with the Tablets and powder dosage forms to support the compounded product's beyond-use date (BUD). They recommend USP consider conducting the necessary studies to bring this monograph in alignment with current standards for new compounding monograph development.

Response: Comment not incorporated. This formulation was removed from the monograph. See the response to comment summary #3.

Comment Summary #6: A commenter notes that for *Formulation in Vehicle A*, compounders will not understand which vehicle(s) are needed to prepare the compounded product. Additionally, they note that Vehicle for Oral Solution and Vehicle for Oral Solution, Sugar Free are *USP* monographs not *NF* monographs per the current compendium. For clarity and to ensure all articles use the official monograph titles in the compendium, consider revising the statement to read, "Vehicle A: a 1:1 mixture of Vehicle for Oral Solution, USP or Vehicle for Oral Solution, Sugar Free, USP, and Vehicle for Oral Suspension, NF, a sufficient quantity to make".

Response: Comment not incorporated. This formulation was removed from the monograph. See response to comment summary #3.

SPECIFIC TESTS

Comment Summary #7: A commenter recommends that, for *Formulation in Vehicle A*, USP consider conducting the necessary studies to include the appearance for the *Formulation in Vehicle A* to be consistent with current standards for new monograph development, similar to the information provided for the *Formulation in Vehicle B*.

Response: Comment not incorporated. This formulation was removed from the monograph. See response to comment summary #3.

Comment Summary #8: A commenter notes that, for *Formulation in Vehicle A*, USP consider conducting the necessary studies to include the same testing required for *Vehicle B*, as indicated below, and to bring this monograph in alignment with current standards for new monograph development.

Response: Comment not incorporated. This formulation was removed from the monograph. See response to comment summary #3.

Comment Summary #9: A commenter recommends USP consider adding the following testing to the *Formulation in Vehicle B* to bring this monograph in alignment with current standards for new monograph development: *Antimicrobial Effectiveness Testing <51>*, *Microbiological Examination of Nonsterile Products—Tests for Burkholderia Cepacia Complex <60>*, *Microbiological Examination of Nonsterile Products: Microbial Enumeration Tests <61>*, and *Microbiological Examination of Nonsterile Products: Tests for Specified Microorganisms <62>*.

Response: Comment not incorporated. Chapter <51> testing for this formulation was completed, and a statement regarding this is in the *Beyond-Use Date* section of this monograph. Requiring compliance with chapters <60>, <61>, and <62> is not included in the requirements in *Pharmaceutical Compounding—Nonsterile Preparations <795>*.

ADDITIONAL REQUIREMENTS

Comment Summary #10: A commenter notes that in the *Packaging and Storage* subsection under *Additional Requirements*, the *Formulation in Vehicle A* states, “Package in tight, light-resistant containers. Store in a refrigerator,” and the *Formulation in Vehicle B* states, “Package in a tight, light-resistant, plastic container. Store at controlled room temperature.” They recommend USP consider indicating the exact size of the container and material of construction used in the stability studies that support the BUD specified in the development of the monograph to ensure appropriate container closure selection for the compounded products.

Response: Comment not incorporated. The *Packaging and Storage* subsection does not require the container size to match the size that was used in the stability study because scaling of volume is allowed by USP under *General Notices*. The monograph states to package the product in plastic containers.

Monograph/Section(s):	CALCIUM WITH VITAMIN D CHEWABLE GELS
Expert Committee:	Non-botanical Dietary Supplements
No. of Commenters:	1

General comment

Comment Summary #1: The commenter recommended not moving the monograph forward, since *USP* monographs are not mandatory for the US market but are recognized by the Australia’s Therapeutic Goods Administration.

The introduction of the monograph will restrict the development of chewable gel products that do not meet the requirements of the monograph or will block market competitors who have difficulty complying with the requirements.

Response: Comment not incorporated. According to *General Notices, 6.30 Alternative and Harmonized Methods and Procedures*, an alternative procedure may be developed. Any alternative method or procedure must be fully validated and must produce comparable results to the compendial method or procedure within allowable limits established on a case-by-case basis. USP may consider adding the commenter’s analytical procedure(s) or acceptance criteria to the monograph to make the monograph applicable to the commenter’s product(s). For such consideration, the commenter would need to submit a validation package for review by the Non-botanical Dietary Supplements Expert Committee.

Definition, Assay

Comment Summary #2: The commenter proposed keeping only the lower limit (NLT 90%) and removing the upper limit, since some specific formulations may require additional overages to

support shelf life. The commenter proposed increasing the RSD from NMT 3.0% to NMT 5.0% for additional flexibility.

Response: Comment not incorporated. The specifications may be revised when new data is submitted to the USP.

Dissolution

Comment Summary #3: The commenter recommended removing the *Dissolution* test, as chewable gels are designed to be swallowed after chewing.

Response: Comment not incorporated. The *Dissolution* test is included in the monograph, in part, because chewable gels may sometimes be swallowed instead of chewed (see FDA Guidance for Industry—Quality Attribute Considerations for Chewable Tablets).

Monograph/Section(s):	NICOTINAMIDE RIBOSIDE CHLORIDE
Expert Committee:	Non-botanical Dietary Supplements
No. of Commenters:	1

Specific Tests

Comment Summary #1: The commenter suggested revising the *Water Determination* section to add sample size and oven temperature.

Response: Comment incorporated. Based on the testing from the USP Reference Standards lab, it was recommended to add the sample size, temperature, and heating time under *Water Determination* for ease of testing. The section is revised to add the following:

Sample: 100 mg
Temperature: 110°
Heating time: 5 min

Contaminants

Comment Summary #2: The commenter suggested revising the RSD requirement in the *Limit of Acetamide* test.

Response: Comment partially incorporated. The Expert Committee recommended keeping the RSD requirement as NMT 5.0% determined from the acetamide peak but using *Standard solution G* rather than *Standard solution A*.

Comment Summary #3: The commenter suggested providing details on the acetamide *Standard stock solution* preparation.

Response: Comment incorporated. The comment was accepted and the proposal was revised to provide details on acetamide *Standard stock solution* preparation.

Comment Summary #4: The commenter suggested removing “prepared from the *Standard stock solution*” in *Standard solution G* in the *Limit of Acetamide* test.

Response: Comment incorporated. The suggestion corrected an error in the monograph proposal.

Identification B

Comment Summary #5: The commenter suggested providing clarity on the NMR analysis section of *Identification B*. Specifically, the commenter suggested revising the sentence to provide clarity on determining the content of alpha-nicotinamide riboside chloride under *Analysis* and *Acceptance criteria*.

Response: Comment incorporated. For ease of analysis, following changes have been made to the *Instrumental conditions*, *Analysis*, and *Acceptance criteria*:

- 1) Revise the instrumental conditions to reflect current terminologies.
- 2) Revise the suitability requirements to read: “Signal-to-noise ratio: Adjust the number of scans until the aromatic Beta-Nicotinamide Riboside Chloride (β -NRC) peak at 8.33 ppm of

nicotinamide riboside chloride from the spectrum of the *Standard solution* is NLT 100:1”.

3) In Table 1, insert peak assignments for the nicotinamide riboside chloride ¹H NMR spectrum to aid in peak identification.

4) Provide clarity on determining the content of alpha-nicotinamide riboside chloride (α-NRC).

5) Insert a new figure to help aid with peak identification.

6) Acceptance Criteria- Content of alpha-nicotinamide riboside chloride: NMT 2.0%

Impurities

Comment Summary #6: The commenter suggested revising the *Column efficiency* requirement under *System suitability* in impurities testing from “NLT 10,000 theoretical plates, *Standard solutions A* and *B*” to “NLT 10,000 and 2000 theoretical plates, respectively, for *Standard solution A* and *Standard solution B*”.

The commenter also suggested revising the "peak response" to "peak area" under the analysis for impurities.

Response: Comment incorporated. Under the *Suitability requirements* in the *Impurities* section, the *Column efficiency* is revised as follows: "NLT 10,000 and 2000 theoretical plates, respectively, for *Standard solution A* and *Standard solution B*" based on testing data from the RS lab.

Under the *Analysis* in the *Impurities* section, "peak response" is revised to "peak area" when calculating the percentages for individual impurities.

Monograph/Section(s):	PROPANEDIOL
Expert Committee:	Simple Excipients
No. of Commenters:	1

Impurities

Comment Summary #1: The commenter recommended switching the colorimetric method for gas chromatography to improve the specificity and sensitivity in the *Limit of Aldehyde* test.

Response: Comment not incorporated. The comment is out of scope for this proposal. A future revision may be considered upon receipt of supporting data.

Monograph/Section(s):	QUINIDINE SULFATE COMPOUNDED ORAL SUSPENSION
Expert Committee:	Compounding
No. of Commenters:	1

Comment Summary #1: A commenter requests this monograph be retained because there is evidence that quinidine sulfate is being compounded as a 10 mg/mL oral suspension. They recommend that USP consider conducting the necessary stability studies to support revision of the monograph to be published in *PF*.

Response: Comment not incorporated. USP maintains this monograph's formulation on its future studies list. The CMP Expert Committee decided to omit the monograph due to Tablets being unavailable. The extended BUD in the monograph does not apply for the powder form due to the monograph formula being for Tablets. The BUDs in *Pharmaceutical Compounding—Nonsterile Preparations <795>* must be assigned in this instance.