

Improving Human Life by Advancing the Field of Transplantation

## AST BOARD OF DIRECTORS 2013-2014

PRESIDENT Daniel R. Salomon, MD The Scripps Research Institute

PRESIDENT-ELECT Kenneth A. Newell, MD, PhD Emory University

IMMEDIATE PAST-PRESIDENT Roslyn B. Mannon, MD University of Alabama at Birmingham

TREASURER Kimberly Ann Brown, MD Henry Ford Hospital

SECRETARY Anil Chandraker, MD, FRCP Brigham and Women's Hospital

COUNCILORS-AT-LARGE James S. Allan, MD, MBA Massachusetts General Hospital

Rita R. Alloway, PharmD University of Cincinnati

Ronald G. Gill, PhD University of Colorado, Denver

Michael G. Ison, MD, MS Northwestern University

Paul Martin, MD University of Miami

Dianne B. McKay, MD University of California, San Diego

Larry B. Melton, MD, PhD Baylor Medical Center, Dallas

David P. Nelson, MD Integris Baptist Medical Center of Oklahoma

Thomas Pearson, MD, DPhil Emory University

EXECUTIVE VICE PRESIDENT Susan J. Nelson, CAE

EXECUTIVE DIRECTOR Libby McDannell, CAE Monday, February 17, 2014

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

Re: Docket No. FDA-2013-D-1358 – Draft Guidance for Industry: Recommendations for Premarket Notification (510(k)) Submissions for Nucleic Acid-Based Human Leukocyte Antigen (HLA) Test Kits Used for Transfusion and Transplantation

To Whom It May Concern:

On behalf of the American Society of Transplantation (AST), representing the majority of professionals engaged in the field of organ transplantation, I write to you in full support of the attached comments from the American Society for Histocompatibility and Immunogenetics (ASHI) regarding the Food and Drug Administration's (FDA) recent draft guidance for industry Docket No. FDA-2013-D-1358.

AST is concerned that the FDA's recent draft guidance (as currently drafted and proposed) will significantly delay the use of newly available HLA allele information in transplant decision making. AST joins ASHI in requesting that the FDA amend the draft guidance to ensure that patient care is not negatively impacted by what appears to be unintended consequences of the proposal as currently drafted.

Thank you in advance for your consideration of our request. If you have any questions, please do not hesitate to contact me directly.

Best Regards,

Daniel Ronlemon M.D.

Daniel Salomon, MD President, American Society of Transplantation

NATIONAL OFFICE 15000 Commerce Parkway, Suite C • Mt. Laurel, NJ 08054 856.439.9986 • Fax: 856.439.9982 • info@myAST.org • www.myAST.org

GOVERNMENT RELATIONS William Applegate, Director of Government Relations • Bryan Cave, LLP 1155 F Street, NW • Washington, DC 20004 202.258.4989 • bill.applegate@bryancave.com WORLD TRANSPLANT CONGRESS 2014

July 26–31, 2014 San Francisco, CA