



Feb 2, 2022

Food and Drug Administration  
Center for Drug Evaluation and Research 5901-B Ammendale Road  
Beltsville, MD 20705-1266

Re: Response to [FDA's Statistical Review and Evaluation Summary](#) of the R Consortium R submission Pilot 1 eCTD submission

Dear Sir/Madam:

On Nov 22, 2021, the R Consortium R submission Working Group received FDA's Statistical Review and Evaluation Summary of the R Consortium R submission Pilot 1 submission. The working group would like to thank FDA staff for the comprehensive review and thoughtful recommendations. We are thrilled to learn that the FDA staff was able to reproduce the analysis outputs using the R programs and the proprietary R package submitted through the eCTD portal. We would also like to thank FDA staff on their transparency on sharing their R codes.

The purpose of this letter is to provide the working group's responses to FDA's Statistical Review and Evaluation Summary of the R Consortium R submission Pilot 1. The following information is provided in response to the findings from FDA Staff's independent programming:

#### Agency Comment 1

Important information, such as a specification of the ANCOVA model, is not given for Table 14-3.02.

#### The R Consortium R Submission Working Group Response

In the updated eCTD submission package, code and output of Table 14-3.02 has been updated following the recommendation.

#### Agency Comment 2

A few values are slightly off. This could potentially be a rounding issue.

#### The R Consortium R Submission Working Group Response

The rounding issue in Table 14-3.01 is because of different approaches used to calculate the 97.5% quantile of the standard normal distribution. More specifically, the submission working group used the quantile value calculated using the function `qt()` while FDA staff used the

approximated value 1.96. We kept our approach in the submission package without further modifications.

The rounding issue in Table 14-3.02 has been addressed after updating according to Agency Comment 1. Specifically, the approach to calculate RMSE was updated.

### Agency Comment 3

Column headers are switched in Table 14-3.01.

### The R Consortium R Submission Working Group Response

The coding error in Table 14-3.01 was corrected in the updated eCTD submission package.

Kind regards,  
The R Consortium R Submission Pilot 1 Project Team