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Document Identification: FDA Pilot Project Test Report (Revision 1)

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REVISION HISTORY

Rev.	Date	Author	Revision Summary
.1	2020-01-24	Jacinthe Mongrain	Initial Version

APPROVAL

List all personnel reviewing and authorizing this test protocol.

Department	Printed Name	Signature	Initials	Date			
		N/A			-		
		Zpri	15JUN2020				
		,					
No approval signature was captured. Test phase approval was provided by email.							
\smile							

IDENTIFICATION RECORD

Document the name, title, signature and initials of all the persons who participate in this test effort. By signing this page, they certify that they have read and understood this protocol.

Name	Title	Signature	Initials / Date
Julien Galibois Sauvageau	Software Deployment Specialist	Julien G. Suvvageau	JGS
Jacinthe Mongrain	Validation Specialist	Jacinthe Mongrain	AM
	N/A		
		AM 15.0002020	



1 Purpose

The goal of the Optel Pilot Project with the FDA is to show that it is possible to meet the Drug Supply Chain Security Act (DSCSA) requirements related to interoperable, electronic tracing of products at the package level, specifically the enhanced requirements for package level tracing and verification that will go into effect in 2023.

2 Scope

The purpose of the present document is to provide documented evidences that the transfer of serialization data to and from all the different parties of the pharmaceutical products distribution chain can be done during the processing of the physical serialized products, without any corruption or blocking issue, from the manufacturer to the dispenser.

The test strategy that was determined to demonstrate this interoperability consists mainly in modifying physical EPC dispositions on simulated physical products at each stage of the distribution chain, and to reconciliate the simulated physical products dispositions with the EPCIS serialization data after each modification of an aggregation. The intention behind this strategy is to simulate a distribution scenario compliant with the Drug Supply Chain Security Act (DSCSA) requirements which is as close as possible to a real-life compliant pharmaceutical products distribution use case.

The present document is loosely based on validation standards in order to produce relevant technical test evidences, and is to be filled up according to the Good Documentation Practices of the industry. It has previously been agreed with the FDA representative that no formal validation effort will be required in the course of this pilot project, since the simulated products that will be handled to demonstrate technical success of this pilot solution will not be actual pharmaceutical products to be sold on the market.

No physical pharmaceutical product will be used for the tests included in the present document. Physical products will be simulated with printed labels. When a reference to a pallet is stated in the test script, it always refers to a simulated pallet that will take the physical form of printed label and the virtual form of aggregated serial numbers.

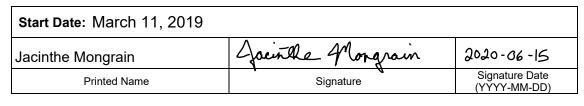
The following companies are involved in this pilot project:

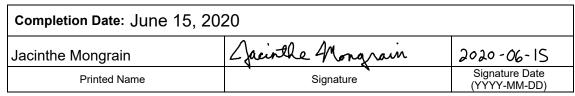
- Solution provider
 - Role: To provide the serialization systems required to transfer serialization data to all the involved parties.
 - Name of company representative: Simon Bastarache
- Manufacturer: ANI Pharmaceuticals
 - Role: To produce the initial serialized and aggregated homogenous pallet simulations on a serialized packaging line. To rework these pallet simulations in the warehouse to make them heterogenous.
 - o Name of company representative: Matt Haataja
- Distributor: McKesson
 - o Role: To rework the heterogenous pallet simulations at the distribution site.
 - Name of company representative: Khushboo Joshi and Brian Schmidt
- Dispenser: simulated by McKesson and Optel
 - Role: To reconciliate the simulated delivered products with the related serialization repository data.
 - Name of company representative: Julien Galibois-Sauvageau



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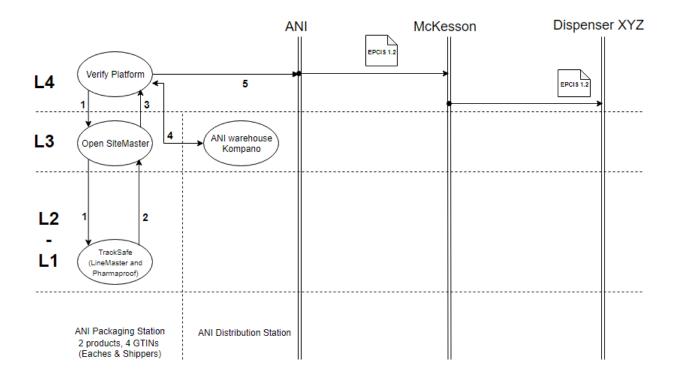
Pilot Project Duration 2.1





2.2 **System Description**

FDA Pilot - DSCSA



1. UID Provisioning to the Optel Lines

UD Provisioning to the Opter Lines
 Finished Goods Data
 Finished Goods Data (EPCIS format, contains COMM and AGG only from OSM)
 Kompano triggering SHIP event using prototype API on VP
 Trigger activates Outcomes on VP to send files to McKesson. (All three - COMM, AGG and SHIP)

Figure 1: Distribution Flow Illustration



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3 Test Strategy

Step 1	Step 2	Step 3	Step 4
More of a prerequisite: 1- Prepare 2 homogenous pallets (16 eaches, 4 cases). 2- Reserve all labels from these pallets. 3- Open the EPCIS reports and reconciliate each label with an EPC in the report.	Kompano Rework: 1- Decommission one each 2- Destroy one each 3- Sample one each 4- Switch a case from Pallet 1 to Pallet 2) Outcome: -1 partial heterogenous palet -1 complete heterogenous pallet	Ask McKesson to: - Reconciliate received labels with EPCIS report(s) - Switch 2 cases on the 2 pallets. - Update and transfer EPCIS report with the annoted labels. Outcome: - 2 partial heterogenous pallets	1- Reconciliate the 2 heterogenous pallets with the EPCIS report(s). 2- Confirm destroyed items are not in EPCIS.

3.1 Assumption

The tests are meant to be executed by technical experts familiar with the Optel solutions. The people executing the tests must understand the Optel systems environments.

The tests are to be reviewed by a trained compliance specialist for test results accuracy and tests documentation compliance with the Good Documentation Practices of the pharmaceutical industry.

3.2 General Procedure

Ensure that all information spaces in the test scripts are completed as the testing is performed. If a page is blank or information is not applicable, then cross it out with a single line and write "N/A". Print and sign your name then date the section that has been crossed out.

Verify that all the test actions produce the expected outcome and provide a test evidence for each outcome. If any outstanding item is observed during a test action, document all the related information in the **Comments** section.

The person filling the test script must sign and date the **Performed by / Date** spaces. The execution should be verified, and then the revision should be signed and dated in the **Reviewed by / Date** boxes at the end of each test section.

Attach all supporting documentation must be attached to the present document.

4 Prerequisite Steps

- 1. Ensure a demo environment is created for the serialization data management in the course of this pilot project.
- 2. Ensure the Optel systems installed at ANI Pharmaceuticals are functional and can produce data for at least two (2) simulated pallets with two (2) different types of product. Ensure a label sample is available for each simulated product package.
- 3. Ensure the Kompano system is functional and communicates with the Verify Platform without any issue.
- 4. Ensure the Verify Platform is configured to send shipping event to McKesson without any issue.
- 5. Ensure that a Dispenser is simulated and is ready to receive serialization data.
- 6. Ensure the McKesson system can send serialization data to the simulated Dispenser.



Date: 2020-01-27

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5 Test Evidences

Objective	The objective of the present document is to provide evidences that the transfer of serialization data throughout the pharmaceutical distribution chain can technically be successful, and therefore that the whole distribution chain can be compliant with the current and upcoming DSCSA regulations implementation phases.				
Test Procedure	Execute the Test Action and document the Observed Results as indicated.				
Test Technical Scope	 Two (2) different simulated pharmaceutical products will be used for this test. Four (4) different GTINs will be used, one for each unit of product, and one for each case of products. SSCCs will be used for pallets. Two (2) pallets (P1 and P2), each containing four (4) cases (C1, C2, C3 and C4), each containing four (4) units (E1, E2, E3, E4, etc.), will be aggregated and reworked. Therefore, P1 and P2 will both initially contain 16 units. The EPCs will be reconciliated with the EPCIS messages related to these EPCs after each rework phases and at the simulated final Dispenser site. All communications will occur in a demo environment, with no impact on ANI Pharmaceuticals and McKesson actual production data. 				
	Comments / Additional Information				
·					
Performed by:	Julien G. Suvageau Date: 22MAY2020 Date: 15/(10) 2020				
Reviewed by:	Jacinthe Mongroun Date: 15JUN2020				
	N (



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Test	Test Start Date and Time (YYYY-MM-DD_HH-MM): 2020-05-22_10:06					
#	Test Action	Observed Result	Test Evidence			
	Step 1: Homogenous Pallets Aggregation with the ANI Pharmaceuticals Optel Systems					
1.	Start a batch on the LineMaster and homogenous aggregated Pallet 1 with 16 units in 4 cases of Product 1.	Pallet 1 is aggregated.	Simulated Products Labels Location: Virtual barcode files			
2.	Start a batch on the LineMaster and homogenous aggregated Pallet 1 with 16 units in 4 cases of Product 2.	Pallet 2 is aggregated.	Simulated Products Labels Location: Virtual barcode files			
	Step 1 Vis	ual Outcome				
	Homogenous Pallet 1 with Product 1 EA1 EA2 CA1 EA3 EA4 EA3 EA4 EA3 EA4 PA1 EA3 EA10 CA3 EA11 EA12 EA3 EA16 CA2 EA7 EA8 PA1	Step 1 Outcome Homogenous Pallet 2 with Product 2 EA17 EA18 CA5 CA6 EA19 EA20 EA23 EA24 PA2 EA25 EA25 EA26 CA7 CA8 EA27 EA28				
	Comments /	Additional Information				
	N/A ⊠					
	Performed by: Julien G. Savvageau	Dat	e: 2211AY2020			
	Performed by: Julien G. Savvageau Reviewed by: Jurnthe Mong	Nour Dat	e: 15MAY2020			
	N 4					



Date: 2020-01-27 Page: 9 of 24

#	Test Action	Observed Result	Test Evidence
	Step 1 R	econciliation	
	Note the Pallet 1 contents labels EPCs and reconciliate the printed EPCs with the EPCIS report aggregation information for this pallet:		
	PA1 SSCC: (00)803625591000001239		
	CA1 SGTIN: (01)50362559620371(21)13Z3LK8ZNJ4TXZ		
	CA2 SGTIN: (01)50362559620371(21)14TGDZKRWYFHNV	The EPCIS report contains the Pallet 1 EPCs in the "Active" disposition and the pallet aggregation data matches the physical pallet configuration.	EPCIS Serialization Report Identification: Test04 EPCIS Report.xml
	CA3 SGTIN: (01)50362559620371(21)14XG98KXSP89GN		
	CA4 SGTIN: (01)50362559620371(21)15QGKS3W8FJFYM		
3.	EA1 SGTIN: (01)00362559620376(21)1558HT89Z9KYXH		
	EA2 SGTIN: (01)00362559620376(21)15ZVKNF4TC78JJ		Simulated Products Labels Location: Virtual barcode files
	EA3 SGTIN:		· <u></u>
	EA4 SGTIN: (01)00362559620376(21)16ZYCR7HPFSTLX		
	EA5 SGTIN: (01)00362559620376(21)179KHJM7DK2R6Y		
	EA6 SGTIN:(01)00362559620376(21)17DPCXCH66RL1L		
	EA7 SGTIN: (01)00362559620376(21)17GFDYNCKQQWPQ		

Comments / Additional Information				
			N/A 🛛	
Performed by:	Julien G. Suvageau	Date:	2211A42020	
Reviewed by:	Documbe Mongrain	Date:	1500020	



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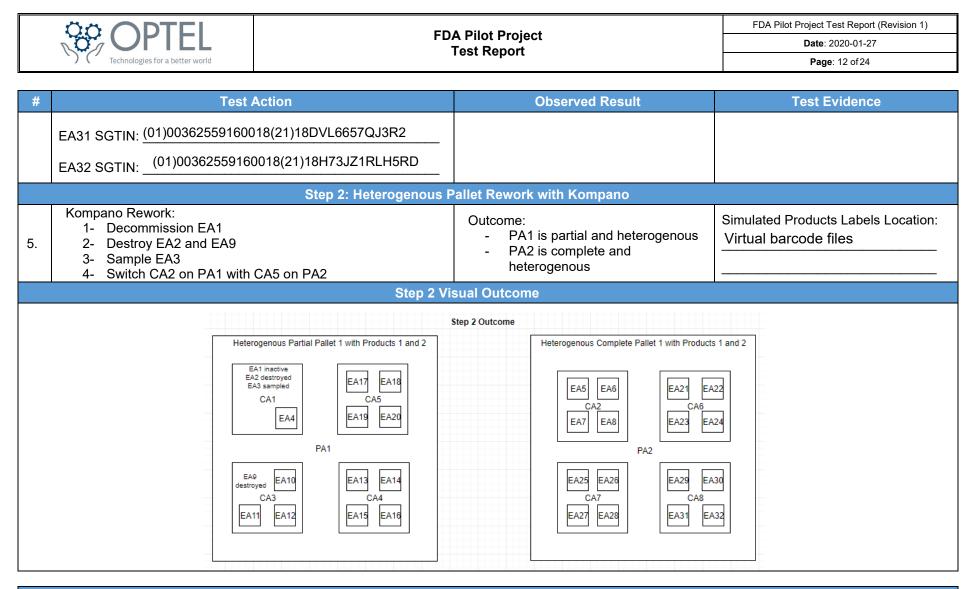
#	Test Action	Observed Result	Test Evidence
	EA8 SGTIN: (01)00362559620376(21)17R1M6HY4N2RMN		
	EA9 SGTIN:(01)00362559620376(21)18R87F47Y333D6_		
	EA10 SGTIN: <u>(01)00362559620376(21)18SW3YHKLHX2H</u> 8		
	EA11 SGTIN: (01)00362559620376(21)18VDC8HN9SXVL7		
	EA12 SGTIN: (01)00362559620376(21)18VNTQPJ1CQW1M		
	EA13 SGTIN: (01)00362559620376(21)1CFX64W86ZC9TH		
	EA14 SGTIN: (01)00362559620376(21)1CY29LW3X1LGL3		
	EA15 SGTIN: (01)00362559620376(21)1D8DXZXXRZKS7W		
	EA16 SGTIN: (01)00362559620376(21)1DZ8KQNSS1KRXZ		
	Note the Pallet 2 contents labels EPCs and reconciliate the printed EPCs with the EPCIS report aggregation information for this pallet:		EPCIS Serialization Report Identification: Test05_EPCIS_Report.xml
	PA2 SSCC: (00)803625591000001246	The EPCIS report contains the Pallet 2 EPCs in the "Active" disposition and the	
4.	CA5 SGTIN: (01)50362559160013(21)1142X8W7DG1FRY	pallet aggregation data matches the physical pallet configuration.	
	CA6 SGTIN: _(01)50362559160013(21)11CRNCVLVFCQ14	F	Simulated Products Labels Location:
	CA7 SGTIN: (01)50362559160013(21)11CZN4PYV25QH8		Virtual barcode files

Comments / Additional Information				
			N/A 🛛	
Performed by:	Julien G. Sunageau	Date:	2211,442.020	
Reviewed by:	Jacinthe Mongrain	Date:	15 JUN2020	



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#	Test Action	Observed Result		Test Evidence	
	CA8 SGTIN:50362559160013(21)124DP42ZHRHSRN		N/A		
	EA17 SGTIN: (01)00362559160018(21)11KND8SZ2STR6Q				
	EA18 SGTIN: (01)00362559160018(21)11NHMWX9Y36PY8				
	EA19 SGTIN: (01)00362559160018(21)11Y74DQ848CPGW				
	EA20 SGTIN: <u>(01)00362559160018(21)125SLNZJHFXD92</u>				
	EA21 SGTIN:(01)00362559160018(21)12HWWYHZFL5D3H				
	EA22 SGTIN: (01)00362559160018(21)135P9LFWRCGPSL				
	EA23 SGTIN: _(01)00362559160018(21)14DMWTKGDQ7RMJ_				
	EA24 SGTIN: _(01)00362559160018(21)14KZHP3HHCML5L				
	EA25 SGTIN: (01)00362559160018(21)14ZCVPWR275VTL				
	EA26 SGTIN: (01)00362559160018(21)15Y5JN18GJLMGH				
	EA27 SGTIN: (01)00362559160018(21)165KX4VQR1TKF3				
	EA28 SGTIN:01)00362559160018(21)16CDM4ZY93Y8F6				
	EA29 SGTIN: (01)00362559160018(21)17X5NK5ML5FYGJ				
	EA30 SGTIN: (01)00362559160018(21)182SCYZ85WC32M				
	Comments /	Additional Information			
					N/A ⊠
	Performed by: Julien G. Suvvigeau	Da	ate:	2211AY2020	
	Performed by: Julien G. Savvigeau Reviewed by: Jacinthe Monana	In	ate:	151002020	



Comments / Additional Information				
See comments in Section	6. JGS		N/A 🗆	
	10 JUN 2021			
Performed by:	Julien G. Savvageau	Date:	10JUN2020	
Reviewed by:	Jacinthe Mongrain	Date:	15JUN 2020	



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#	Test Action	Observed Result	Test Evidence
	Step 2 R	econciliation	
	Note the Pallet 1 contents labels EPCs and reconciliate the printed EPCs with the EPCIS report aggregation information for this pallet: Partial PA1 SSCC: (00)803625591000001239		
	Partial CA1 SGTIN:		EPCIS Serialization Report
	CA5 SGTIN: (01)50362559160013(21)1142X8W7DG1FRY	The EPCIS report contains the Pallet 1	Identification: _(00)803625591000001239 after_Kompano_rework.xlsx
6.	Partial CA3 SGTIN: (01)50362559620371(21)14XG98KXSP89GN	EPCs and the pallet aggregation data matches the physical pallet configuration. - EA1 is inactive - EA2 is destroyed	
	CA4 SGTIN: (01)50362559620371(21)15QGKS3W8FJFYM		
0.	Inactive EA1 SGTIN: (01)00362559620376(21)1558HT89Z9KYXH	EA3 is sampledEA9 is destroyed	
	Destroyed EA2 SGTIN:	 CA5 is aggregated to PA1 CA2 is not aggregated to PA1 	Simulated Products Labels Location: Virtual barcode files
	Sampled EA3 SGTIN: (01)00362559620376(21)16WQSQZHR4RPT1	anymore	
	EA4 SGTIN: (01)00362559620376(21)16ZYCR7HPFSTLX		
	EA17 SGTIN: (01)00362559160018(21)11KND8SZ2STR6Q		
	EA18 SGTIN: (01)00362559160018(21)11NHMWX9Y36PY8		
	EA19 SGTIN: (01)00362559160018(21)11Y74DQ848CPGW		

Comments / Additional Information				
See comments in Section 6.	JGS 10JUN 2021		N/A 🗆	
Performed by:	Julien G. Savvageau	Date:	10JUN2021	
Reviewed by:	Jacinthe Monarain	Date:	15JUN 2020	
	\mathcal{A}			



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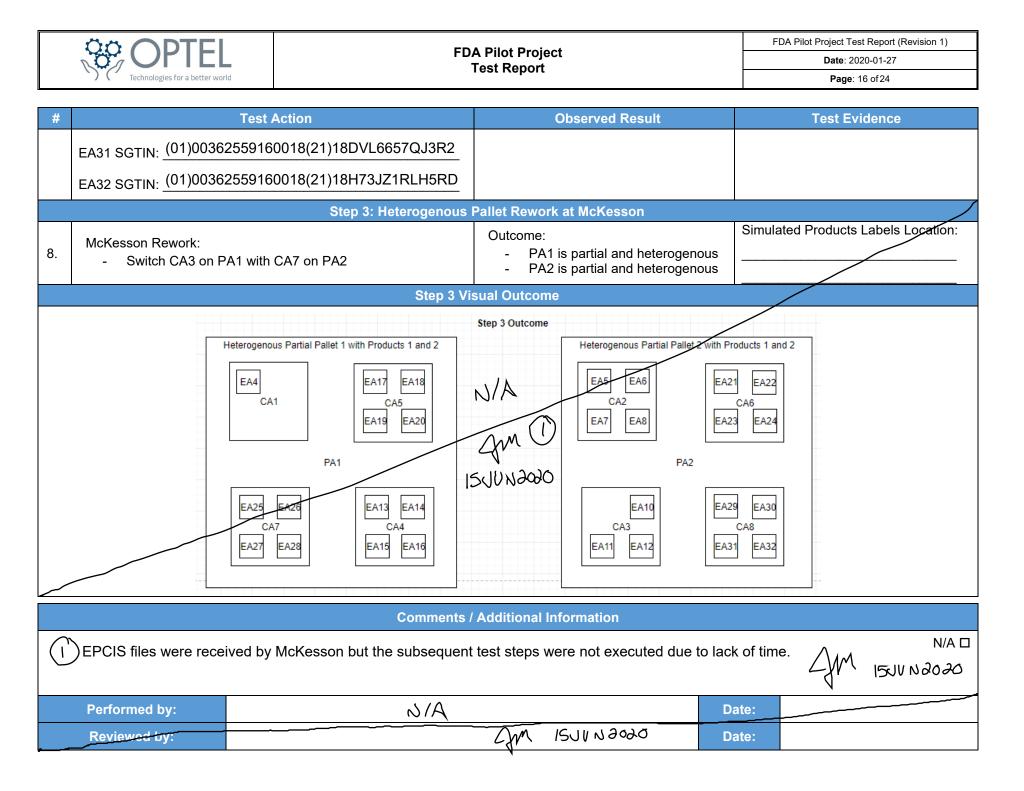
#	Test Action	Observed Result	Test Evidence
	EA20 SGTIN: (01)00362559160018(21)125SLNZJHFXD92		
	Destroyed EA9 SGTIN:(01)00362559620376(21)18R87F47Y333D6		
	EA10 SGTIN: (01)00362559620376(21)18SW3YHKLHX2H8		
	EA11 SGTIN: (01)00362559620376(21)18VDC8HN9SXVL7		
	EA12 SGTIN: (01)00362559620376(21)18VNTQPJ1CQW1M		
	EA13 SGTIN: (01)00362559620376(21)1CFX64W86ZC9TH		
	EA14 SGTIN: (01)00362559620376(21)1CY29LW3X1LGL3		
	EA15 SGTIN: (01)00362559620376(21)1D8DXZXXRZKS7W		
	EA16 SGTIN: (01)00362559620376(21)1DZ8KQNSS1KRXZ		
	Note the Pallet 2 contents labels EPCs and reconciliate the printed EPCs with the EPCIS report aggregation information for this pallet:	The EPCIS report contains the Pallet 2	EPCIS Serialization Report Identification: (00)803625591000001246_
7.	PA2 SSCC: (00)803625591000001246	EPCs in the "Active" disposition and the pallet aggregation data matches the	after_Kompano_rework.xlsx
1.	CA2 SGTIN: (01)50362559620371(21)14TGDZKRWYFHNV	 physical pallet configuration. CA2 is aggregated to PA2 	
	CA6 SGTIN: (01)50362559160013(21)11CRNCVLVFCQ14	 CA5 is not aggregated to PA2 anymore 	Simulated Products Labels Location:
	CA7 SGTIN: (01)50362559160013(21)11CZN4PYV25QH8		Virtual barcode files

Comments / Additional Information				
			N/A 🛛	
Performed by:	Julien G. Savageau	Date:	10JUN2020	
Reviewed by:	Jacinthe Mongrain	Date:	15002020	



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# Test Action	Observed Result	Test Evidence
CA8 SGTIN: (01)50362559160013(21)124DP42ZHRHSRN		<u>N/A</u>
EA5 SGTIN: (01)00362559620376(21)179KHJM7DK2R6Y		
EA6 SGTIN:(01)00362559620376(21)17DPCXCH66RL1L		
EA7 SGTIN: (01)00362559620376(21)17GFDYNCKQQWPQ		
EA8 SGTIN:(01)00362559620376(21)17R1M6HY4N2RMN		
EA21 SGTIN: (01)00362559160018(21)12HWWYHZFL5D3H		
EA22 SGTIN: (01)00362559160018(21)135P9LFWRCGPSL		
EA23 SGTIN: (01)00362559160018(21)14DMWTKGDQ7RMJ		
EA24 SGTIN: (01)00362559160018(21)14KZHP3HHCML5L		
EA25 SGTIN: (01)00362559160018(21)14ZCVPWR275VTL		
EA26 SGTIN: (01)00362559160018(21)15Y5JN18GJLMGH		
EA27 SGTIN: (01)00362559160018(21)165KX4VQR1TKF3		
EA28 SGTIN: (01)00362559160018(21)16CDM4ZY93Y8F6		
EA29 SGTIN: (01)00362559160018(21)17X5NK5ML5FYGJ		
EA30 SGTIN: (01)00362559160018(21)182SCYZ85WC32M		
Comments / /	Additional Information	
		N/A 🛛
Performed by: Julien G. Savvageau	D	late: 10 JUN 2021
Performed by: Julien G. Savrageau Reviewed by: Jacin the Mongy	jain D	ate: 5JUN 2020





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#	Test Action	Observed Result	Test Evidence
	Step 3 R	econciliation	
9.	Note the Pallet 1 contents labels EPCs and reconciliate the printed EPCs with the EPCIS report aggregation information for this pallet: Partial PA1 SSCC: Partial CA1 SGTIN: CA5 SGTIN: CA7 SGTIN: CA4 SGTIN: EA4 SGTIN: EA13 SGTIN: EA13 SGTIN: EA14 SGTIN: EA15 SGTIN: EA15 SGTIN: EA16 SGTIN: EA17 SGTIN: EA18 SGTIN:	The EPCIS report contains the Pallet 1 EPCs and the pallet aggregation data matches the physical pallet configuration. - CA7 is aggregated to PA1 - CA3 is not aggregated to PA1 anymore N/A [5JUN2620	EPCI8 Serialization Report Identification: Simulated Products Labels Location:

Comments / Additional Information		
		N/A 🗆
Performed by:	Date:	
Reviewed by:	Date:	



#	Test Action	Observed Result	Test Evidence		
	EA19 SGTIN:				
	EA28 SGTIN:				
10.	Note the Pallet 2 contents labels EPCs and reconciliate the printed EPCs with the EPCIS report aggregation information for this pallet: Partial PA2 SSCC: CA2 SGTIN: Partial CA3 SGTIN: CA6 SGTIN: CA8 SGTIN: EA5 SGTIN: EA6 SGTIN:	N / A The EPCIS report contains the Pallet 2EPCs and the pallet aggregation data matches the physical pallet configuration. - CA3 is aggregated to PA2 CA7 is not aggregated to PA2 anymore.	EPCIS Serialization Report Identification: 		
	Comments	Additional Information			
	N/A 🗆				
	Performed by:	D	ate:		
	Reviewed by:	D	ate:		

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#	Test Action	Observed Result	Test Evidence
	EA7 SGTIN:		
	EA8 SGTIN:		
	EA10 SGTIN:		
	EA11 SGTIN:		
	EA12 SGTIN:		
	EA21 SGTIN:		
	EA22 SGTIN:		
	EA23 SGTIN:	N/A	
	EA24 SGTIN:	Λ.Μ	
	EA29 SGTIN:	Z	
	EA30 SGTIN:	15 JUN 2020	
	EA31 SGTIN:		
	EA32 SGTIN:		

	Comments / Additional Information		
			N/A 🗆
Performed by:		Date:	
Reviewed by:		Date:	



#	Test Action	Observed Result	Test Evidence			
	Step 4: Final Reconciliation at Simulated Dispenser					
11.	Reconciliate the Pallet PA1 contents with the related EPCIS report.	The whole Pallet PA1 contents is logged in the related EPCIS report.	EPCIS Serialization Report Identification:			
12.	Reconciliate the Pallet PA2 contents with the related EPCIS report.	N/A The whole Pallet PA2 contents is logged in the related EPCIS report. AM (5JUN 2020	EPCIS Serialization Report Identification: 			
	Comments / Additional Information					
	N/A 🗆					
	Performed by:	D	ate:			
	Reviewed by:	D	ate:			

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#	Test Action	Observed Result	Test Evidence			
13.	Verify that there is no EPC in the Pallet PA1 EPCIS report that is not part of Pallet PA1.	There is no EPC in the Pallet PA1 EPCIS report that is not part of Pallet PA1.	EPCIS Serialization Report Identification:			
14.	Verify that there is no EPC in the Pallet PA2 EPCIS report that is not part of Pallet PA2.	There is no EPC in the Pallet PA2 EPCIS report that is not part of Pallet PA2.	EPCIS Serialization Report Identification:			
Test	Test End Date and Time (YYYY-MM-DD_HH-MM): 2020-06-15_16-29					

Comments / Additional Information				
N/A Tests could not be executed in whole due to lack of time. AM 15JV N 2020				
Performed by:	N/A	Date:		
Reviewed by:	CM ISJUNZOZO	Date:		



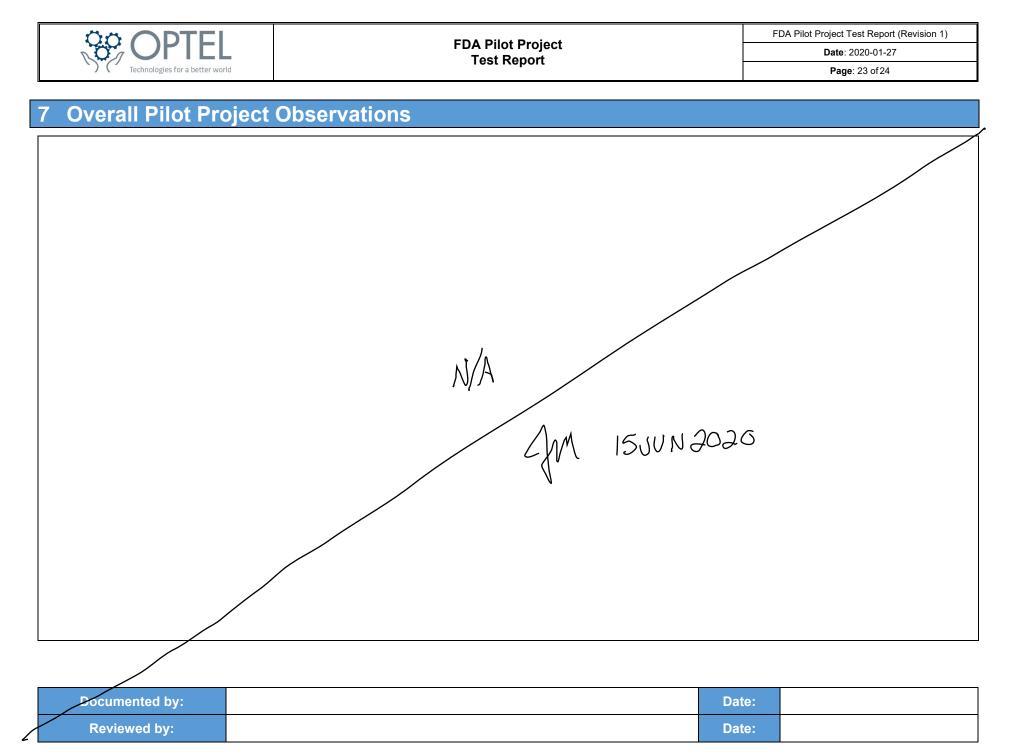
Date: 2020-01-27

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6 Test Phase Observations

Steps 5 & 6: At the time of execution, a bug was found on Verify Platform which prevents changing UID statuses to "Destroyed" and "Sampled" via Kompano, or through the web interface. However, it was possible to change them to "Inactive". As a result, EA2 and EA9 were not destroyed but instead decommissioned, and EA3 was not sampled but also decommissioned. This slightly changes the results of step 6 but the items were still removed from the parents. JGS ISJUN 2020 The tests from the present document could not be completed due to lack of time. The last executed action was the transfer of the EPCIS files to McKesson, which confirmed they were received correctly. 21002020 N/A 150002020

Documented by:	Julien G. Suvageau	Date:	ISJUN2020
Reviewed by:	Clacinthe Monarain	Date:	15JUN 2020
			, .





8 Review and Approval

The following signatures indicate that the persons have entirely reviewed these tests evidences and all supporting documents and agree that it is complete and correct.

Department	Printed Name	Signature	Date
Validation	Jacinthe Mongrain	Jacinthe Mongrain	15JUN 2020
		N/A	
		AM 15000 2020	