CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

63065/S14, S15

BIOEQUIVALENCY REVIEW(S)

Minocycline Hydrochloride Capsules
100 mg & 75 mg
AADA #63-065 / SCQ-014
Reviewer: Hoainhon Nguyen

Danbury Pharmacal
Danbury, CT
Submission Date:
July 31, 1998
November 5, 1998

Review of Disolution Data
and a Waiver Request

I. Background:

The firm has submitted dissolution data for the 75 mg strength of the above test product (The strength was approved under Docket No. 98P-0042/CP1.) in support of the request for waiver of *in vivo* bioequivalence requirements for the 75 mg strength. The formulations of the 100 mg and 75 mg strengths are dose proportional and the two strengths are manufactured from a "common blend".

In addition, the firm has also submitted comparative dissolution data for two lots of the 100 mg strengths of the RLD product, Lederle's Minocin Capsules USP, one used in the 1988 bio study and one recently manufactured.

II. Comment and Recommendation:

Although the bioequivalence study for the 100 mg strength of the test product was found acceptable (See review of the submission dated March 13, 1998), the DSI audit for the study has found that *"the integrity of data generated in Study 8409A is questionable due to the many errors and non-compliant practices involved in the conduct of the study."* The OGD *"has concluded that the study data are not reliable and do not support the therapeutic equivalence evaluation code determinations for"* the test product (See a copy of the OGD's correspondence to Danbury dated November 10, 1998 attached.). The OGD has requested the firm to conduct a new bioequivalence study for the test product for these reasons.

The dissolution data and waiver request for the 75 mg strength therefore will not be considered at this time and pending acceptable results of the new study requested for

the 100 mg strength.

Hoainhon Nguyen
Division of Bioequivalence
Review Branch I

RD INITIALED YHUANG
FT INITIALED YHUANG /S/ 11/25/98

Concur: /S/ Date: 11/30/98
Dale P. Conner, Pharm.D.
Division of Bioequivalence

cc: AADA # 63-065 (original, duplicate), HFD-652(Huang, Nguyen), Drug File, Division File, HFD-650(Director)

Hnguyen/11-19-98/WP #63065dw.798
Attachments: 2 pages

BIOEQUIVALENCY DEFICIENCY COMMENT

AADA: 63-065 APPLICANT: Danbury Pharmacal

DRUG PRODUCT: Minocycline Hydrochloride Capsules, 75 mg & 100 mg

The Division of Bioequivalence has completed its review of your submission(s) acknowledged on the cover sheet. The following deficiency has been identified.

Due to the unacceptable findings from the DSI audit for the bioequivalence study (No. 8409A) of the 100 mg strength of the test product, the dissolution data and waiver request for the 75 mg strength will not be reviewed at this time pending the results of a new bio study for the 100 mg. This new bio study has been requested in the OGD correspondence to you dated November 10, 1998.

Sincerely yours,

/S/

Dale P. Conner, Pharm. D.
Director, Division of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research