CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

21-544

CORRESPONDENCE

August 27, 2003

Division of Reproductive and Urologic Drug Products, HFD-580
Center for Drug Evaluation and Research
Food and Drug Administration
Document Control Room 17B-20
5600 Fisher Lane
Rockville, MD 20857

NDA 21-544
Seasonale®
Levonorgestrel and Ethinyl Estradiol Tablets, USP 0.15 mg/0.03 mg
RESPONSE TO FDA'S LABELING COMMENTS

Reference is made to our New Drug Application (NDA) submitted on August 5, 2002, under Section 505(b) of the Federal Food, Drug and Cosmetic Act for Seasonale.

Reference is also made to the August 22, 2003 email from Dr. Scott Monroe of the Division of Reproductive and Urologic Drug Products with the Division's revisions to the Package Insert. Additionally, Barr is sending pdf versions of final color print of the packaging labeling components intended for commercial marketing, specifically, the carton and pouch.

Barr Research has accepted nearly all of the Division's recommended revisions; we have made editorial changes to the following two sections: **Indications and Usage and Warnings: Thromboembolism.** In addition, we are proposing additional language in both the **Indications and Usage** and **Warnings: 11. Bleeding Irregularities** sections. Specifically, the proposal for the **Indications and Usage** section is to add a statement concerning [redacted] being highly effective [redacted] The addition of this statement is consistent with the labels of all currently marketed contraceptives. Our proposed revision to the **Warnings: 11 Bleeding Irregularities** is to add additional information consistent with Barr's August 12, 2003 submission to the NDA concerning bleeding patterns.

Barr Research respectfully requests a teleconference with the Division if there is major disagreement with our proposals to the Seasonale labeling.

As requested by the Agency, Barr Research has revised the package insert, carton and foil pouch. The revised labeling is being submitted to the document control room on a CD ROM. In addition, a desk copy is also being sent to Karen Anderson. A certification for the electronic submission is also provided.

Please feel free to contact me with any questions or requests by phone (201) 930-3600 or by e-mail at cmundkur@barrlabs.com.

Sincerely,
BARR RESEARCH

Christine Mundkur
Senior Vice President, Quality and Regulatory Counsel

37 Draft Labeling Page(s) Withheld

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-544

INFORMATION REQUEST LETTER

Barr Laboratories, Inc.
Attention: Christine Mundkur
Senior Vice President, Quality and Regulatory Counsel
One Bala Plaza, Suite 324
Bala Cynwyd, PA 19004-1401

Dear Ms. Mundkur:

Please refer to your August 5, 2002 new drug application (NDA) submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Seasonale® (levonorgestrel /ethinyl estradiol tablets, USP) 0.15 mg/0.03 mg.

The Division of Medication Errors and Technical Support (DMETS) has reviewed the proposed carton label and labeling and has the following comments. We request a prompt written response in order to continue our evaluation of your NDA.

1. Regarding the use of the statement "[redacted]" on the carton labeling, DMETS has concerns that "[redacted]" will be used to advertise this product in which case physicians may write for "[redacted]" rather than "Seasonale". This may cause confusion among pharmacists, as they may be familiar with the proprietary name "Seasonale" and not the term "[redacted]". Remove "[redacted]" from all labels and labeling.

2. Remove the "[redacted]" from the established name and revise all labels and labeling to read: (levonorgestrel and ethinyl estradiol tablets, USP) 0.15 mg/0.03 mg.

3. Ensure that the established name is at least ½ the size of the proprietary name.

If you have any questions, call Karen Anderson, NP, Project Manager, at (301) 827-4260.

Sincerely,

{see appended electronic signature page}

Moo-Jhong Rhee, Ph.D.
Chemistry Team Leader for the
Division of Reproductive and Urologic Drug Products, HFD-580
DNDC II, Office of New Drug Chemistry
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Moo-Jhong Rhee
6/18/03 08:43:54 AM

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

NDA 21-544

Barr Laboratories, Inc.
Attention: Christine Mundkur
Senior Vice President Quality and Regulatory Counsel
One Bala Plaza, Suite 324
Bala Cynwyd, PA 19004-1401

Dear Ms. Mundkur:

We have received your new drug application (NDA) submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for the following:

Name of Drug Product:	Seasonale® (levonorgestrel/ethinyl estradiol)) Tablets
Review Priority Classification:	Standard (S)
Date of Application:	August 5, 2002
Date of Receipt:	August 5, 2002
Our Reference Number:	NDA 21-544

Unless we notify you within 60 days of our receipt date that the application is not sufficiently complete to permit a substantive review, this application will be filed under section 505(b) of the Act on October 5, 2002 in accordance with 21 CFR 314.101(a). If the application is filed, the primary user fee goal date will be June 5, 2003.

Be advised that, as of April 1, 1999, all applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred (63 *FR* 66632). If you have not already fulfilled the requirements of 21 CFR 314.55 (or 601.27), please submit your plans for pediatric drug development within 120 days from the date of this letter unless you believe a waiver is appropriate. Within approximately 120 days of receipt of your pediatric drug development plan, we will review your plan and notify you of its adequacy.

If you believe that this drug qualifies for a waiver of the pediatric study requirement, you should submit a request for a waiver with supporting information and documentation in accordance with the provisions of 21 CFR 314.55 within 60 days from the date of this letter. We will make a determination whether to grant or deny a request for a waiver of pediatric studies during the review of the application. In no case, however, will the determination be made later than the date action is taken on the application. If a waiver is not granted, we will ask you to submit your pediatric drug development plans within 120 days from the date of denial of the waiver.

Pediatric studies conducted under the terms of section 505A of the Federal Food, Drug, and Cosmetic Act may result in additional marketing exclusivity for certain products (pediatric exclusivity). You should refer to the *Guidance for Industry on Qualifying for Pediatric Exclusivity* (available on our web site at www.fda.gov/cder/pediatric) for details. If you wish to qualify for pediatric exclusivity you should submit a "Proposed Pediatric Study Request" (PPSR) in addition to your plans for pediatric drug development described above. We recommend that you submit a Proposed Pediatric Study Request within 120 days from the date of this letter. If you are unable to meet this time frame but are interested in pediatric exclusivity, please notify the division in writing. FDA generally will not accept studies submitted to an NDA before issuance of a Written Request as responsive to a Written Request. Sponsors should obtain a Written Request before submitting pediatric studies to an NDA. If you do not submit a PPSR or indicate that you are interested in pediatric exclusivity, we will review your pediatric drug development plan and notify you of its adequacy. Please note that satisfaction of the requirements in 21 CFR 314.55 alone may not qualify you for pediatric exclusivity. FDA does not necessarily ask a sponsor to complete the same scope of studies to qualify for pediatric exclusivity as it does to fulfill the requirements of the pediatric rule.

Please cite the NDA number listed above at the top of the first page of any communications concerning this application. All communications concerning this NDA should be addressed as follows:

U.S. Postal/Courier/Overnight Mail:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Reproductive and Urologic Drug Products, HFD-580
Attention: Division Document Room
5600 Fishers Lane
Rockville, Maryland 20857

If you have any questions, call Jennifer Mercier, B.S., Regulatory Health Project Manager, at (301) 827-4260.

Sincerely,

{See appended electronic signature page}

Margaret Kober, R.Ph.
Chief, Project Management Staff
Division of Reproductive and Urologic Drug Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Margaret Kober
8/8/02 10:22:37 AM