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RESEARCH**

APPLICATION NUMBER:
21-795

APPROVABLE LETTER

AE letter dated
December 22, 2005



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-795

Ferring Pharmaceuticals, Inc.
Attention: Ronald Hargreaves, Ph.D.
Executive Director, Regulatory Affairs
400 Rella Boulevard, Suite 300
Suffern, NY 10901

Dear Dr. Hargreaves:

Please refer to your new drug application (NDA) dated March 2, 2005, received March 4, 2005, submitted under section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Minirin (desmopressin acetate) Tablets, 0.1 and 0.2 mg.

We acknowledge receipt of your submissions dated April 12 and 27, June 14 and 17, August 9, September 27, October 28, and December 6, 2005.

We have completed our review of this application, as amended, and it is approvable. We have conducted an audit of the clinical and analytical portions of the bioequivalence study entitled, *An Open-Label, Randomized, Cross-over Study with Two Treatment Periods Investigating the Bioequivalence of a Single Dose of Minirin Tablets (0.2 mg) and a Single Dose of DDAVP Tablets (0.2 mg) in Healthy Male and Female Participants*" (FE992026 CS025). The accuracy of a large number of analytical runs was not demonstrated due to unacceptable quality control performance.

Before the application may be approved, it will be necessary for you to conduct another bioequivalence study or rerun the stored samples from Study FE992026 CS025 with acceptable quality control performance.

Labeling will be discussed at a later date.

When you respond to the above deficiencies, include a safety update as described at 21 CFR 314.50(d)(5)(vi)(b). The safety update should include data from all non-clinical and clinical studies of the drug under consideration regardless of indication, dosage form, or dose level.

1. Describe in detail any significant changes or findings in the safety profile.
2. When assembling the sections describing discontinuations due to adverse events, serious adverse events, and common adverse events, incorporate new safety data as follows:
 - Present new safety data from the studies for the proposed indication using the same format as the original NDA submission.
 - Present tabulations of the new safety data combined with the original NDA data.

- Include tables that compare frequencies of adverse events in the original NDA with the retabulated frequencies described in the bullet above.
 - For indications other than the proposed indication, provide separate tables for the frequencies of adverse events occurring in clinical trials.
3. Present a retabulation of the reasons for premature study discontinuation by incorporating the drop-outs from the newly completed studies. Describe any new trends or patterns identified.
 4. Provide case report forms and narrative summaries for each patient who died during a clinical study or who did not complete a study because of an adverse event. In addition, provide narrative summaries for serious adverse events.
 5. Describe any information that suggests a substantial change in the incidence of common, but less serious, adverse events between the new data and the original NDA data.
 6. Provide a summary of worldwide experience on the safety of this drug. Include an updated estimate of use for drug marketed in other countries.
 7. Provide English translations of current approved foreign labeling not previously submitted.

Within 10 days after the date of this letter, you are required to amend this application, notify us of your intent to file an amendment, or follow one of your other options under 21 CFR 314.110. If you do not follow one of these options, we will consider your lack of response a request to withdraw the application under 21 CFR 314.65. Any amendment should respond to all the deficiencies listed. We will not process a partial reply as a major amendment nor will the review clock be reactivated until all deficiencies have been addressed.

Under 21 CFR 314.102(d), you may request a meeting or telephone conference with this division to discuss what steps need to be taken before the application may be approved.

The drug product may not be legally marketed until you have been notified in writing that the application is approved.

If you have any questions, call Lina AlJuburi, Pharm.D., M.S., Regulatory Project Manager, at (301) 796-1168.

Sincerely,

{See appended electronic signature page}

David Orloff, M.D.
Director
Division of Metabolism and Endocrinology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

**This is a representation of an electronic record that was signed electronically and
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/s/

Mary Parks
12/22/2005 03:55:27 PM
for Dr. Orloff