CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

200179Orig1s000

Trade Name: Staxyn Orally Disintegrating Tablet, 10 mg.

Generic Name: Vardenafil hydrochloride

Sponsor: Bayer Healthcare Pharmaceuticals

Approval Date: June 17, 2010

Indications: Treatment of Erectil Dysfunction.

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CONTENTS

Reviews / Information Included in this NDA Review.

Approval Letter	**X**
Other Action Letters	
Labeling	**X**
REMS	
Summary Review	**X**
Officer/Employee List	**X**
Office Director Memo	
Cross Discipline Team Leader Review	**X**
Medical Review(s)	**X**
Chemistry Review(s)	**X**
Environmental Assessment	
Pharmacology Review(s)	**X**
Statistical Review(s)	**X**
Microbiology Review(s)	
Clinical Pharmacology/Biopharmaceutics Review(s)	**X**
Other Reviews	**X**
Risk Assessment and Risk Mitigation Review(s)	
Proprietary Name Review(s)	**X**
Administrative/Correspondence Document(s)	**X**

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APPROVAL LETTER

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 200179 **NDA APPROVAL**

Bayer Healthcare Pharmaceuticals
Attention: Alexandra Park
Deputy Director, Global Regulatory Affairs
P.O. Box 1000
Montville, NJ 07045-1000

Dear Ms. Park:

Please refer to your new drug application (NDA) dated and received August 26, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act, for STAXYN™ (vardenafil hydrochloride), orally disintegrating tablet, 10 mg.

We acknowledge receipt of your submissions dated September 16 and 28, October 20 and 30, November 16, and December 9 and 23, 2009, February 12 and 15, March 2, April 20 and 30, and May 12, 19 and 28, June 9, 16 and 17, 2010.

This new drug application provides for the use of STAXYN™ for the treatment of erectile dysfunction.

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for this application because the required studies are impossible or highly impracticable because the indication for this drug product does not occur in the pediatric population.

POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and

clinical trials for certain purposes, if FDA makes certain findings required by the statute (section 505(o)(3)(A)).

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to identify an unexpected serious risk of orthostatic hypotension in elderly men.

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA has not yet been established and is not sufficient to assess this serious risk.

Finally, we have determined that only a clinical trial (rather than a nonclinical or observational study) will be sufficient to identify an unexpected serious risk of orthostatic hypotension in elderly men.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following:

> 1653-1. A drug interaction clinical trial to assess the potential for orthostatic hypotension in elderly men (age 65 – 80) with erectile dysfunction whose hypertension is controlled with a vasodilator who have been on a stable dose for at least four weeks and who are then treated with vardenafil hydrochloride orally disintegrating tablets (ODT) 10 mg. The design should be a randomized, double-blind, placebo-controlled, cross-over study stratified by age (n=20 in age 65-69, n=20 in age 70-80) with the following treatments: vardenafil 10 mg ODT or placebo administered concomitantly with a vasodilator.

The timetable you submitted on June 9, 2010, states that you will conduct this study according to the following timetable:

Final Protocol Submission:	December 2010
Trial Completion Date:	February 2012
Final Report Submission:	August 2012

Submit the protocol to your IND, with a cross-reference letter to this NDA. Submit the final report to your NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate:

- **REQUIRED POSTMARKETING PROTOCOL UNDER 505(o)**
- **REQUIRED POSTMARKETING FINAL REPORT UNDER 505(o)**
- **REQUIRED POSTMARKETING CORRESPONDENCE UNDER 505(o)**

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B of the FDCA, as well as 21 CFR 314.81(b)(2)(vii) requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 314.81(b)(2)(vii) to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 314.81(b)(2)(vii). We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm, that is identical to the enclosed labeling (text for the package insert, text for the patient package insert). Information on submitting SPL files using eLIST may be found in the guidance for industry titled "SPL Standard for Content of Labeling Technical Qs and As" at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible via publicly available labeling repositories.

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and container labels that are identical to the enclosed carton and immediate container labels as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (October 2005)". For administrative purposes, designate this submission "**Final Printed Carton and Container Labels for approved NDA 200179**." Approval of this submission by FDA is not required before the labeling is used.

Marketing the product with Final Printed Labeling (FPL) that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705-1266

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

LETTERS TO HEALTH CARE PROFESSIONALS

If you decide to issue a letter communicating important safety-related information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit, at least 24 hours prior to issuing the letter, an electronic copy of the letter to this NDA, to CDERMedWatchSafetyAlerts@fda.hhs.gov, and to the following address:

MedWatch
Food and Drug Administration
Suite 12B-05
5600 Fishers Lane
Rockville, MD 20857

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Eufrecina DeGuia, Senior Regulatory Health Project Manager, at (301) 796-0881.

Sincerely,

{See appended electronic signature page}

George Benson, M.D.
Deputy Director
Division of Reproductive and Urologic Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

ENCLOSURE(S):
Content of Labeling
Carton and Container Labeling

Application Type/Number	Submission Type/Number	Submitter Name	Product Name
NDA-200179	ORIG-1	BAYER HEALTHCARE PHARMACEUTICALS INC	VARDENAFIL HCL

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

/s/

GEORGE S BENSON
06/17/2010