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RESEARCH**

APPLICATION NUMBER:
200738Orig1s000

OTHER ACTION LETTERS



NDA 200738

COMPLETE RESPONSE

Bausch & Lomb Incorporated
Attention: Michael Bailey
Director, Global Regulatory Affairs, Pharmaceuticals
7 Giralda Farms, Suite 1001
Madison, NJ 07940

Dear Mr. Bailey:

Please refer to your New Drug Application (NDA) dated December 22, 2009, received December 23, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Lotemax (loteprednol etabonate ophthalmic ointment) 0.5%.

We acknowledge receipt of your amendments dated January 26, February 4, March 4 (2), April 30, May 11 and 27, June 9 and 17, July 21, and September 21 (2), 2010.

We have completed our review of this application, as amended, and have determined that we cannot approve this application in its present form. We have described our reasons for this action below and, where possible, our recommendations to address these issues. Satisfactory resolution of these deficiencies is required before this application may be approved.

- 1) Manufacturing facilities for the drug substance are not in compliance with current good manufacturing practice. Please amend the application with facilities that are in compliance with current good manufacturing practice (cGMP) or notify us when all currently submitted facilities are in compliance with cGMPs.
- 2) The proposed controls for the drug product are inadequate to preserve the quality or stability of the drug product. Specifically, the wide acceptance criteria do not provide adequate control on dose uniformity. The acceptance criteria should be based on data from homogeneous samples at release with a narrower range than currently proposed. The dose uniformity test with appropriate acceptance criteria should be able to identify settling in samples during stability. When responding to this deficiency, please submit the complete data set from the stability studies.

When you respond to the above deficiencies, please include a safety update as described at 21 CFR 314.50(d)(5)(vi)(b). We reserve comment on the proposed labeling until the application is otherwise adequate. If you revise labeling, your response must include updated content of labeling [21 CFR 314.50(l)(1)(i)] in structured product labeling (SPL) format as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>.

Within one year after the date of this letter, you are required to resubmit or take other actions available under 21 CFR 314.110. If you do not take one of these actions, we may consider your lack of response a request to withdraw the application under 21 CFR 314.65. You may also request an extension of time in which to resubmit the application. A resubmission must fully address all the deficiencies listed. A partial response to this letter will not be processed as a resubmission and will not start a new review cycle.

Under 21 CFR 314.102(d), you may request a meeting or telephone conference with us to discuss what steps you need to take before the application may be approved. If you wish to have such a meeting, submit your meeting request as described in the FDA's "Guidance for Industry - Formal Meetings Between the FDA and Sponsors or Applicants," May 2009 at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM153222.pdf>.

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

If you have any questions, call Fariba Izadi, Pharm.D., Regulatory Project Manager, at (301) 796-0563.

Sincerely,

{See appended electronic signature page}

Wiley A. Chambers, M.D.
Acting Director
Division of Anti-Infective and Ophthalmology Products
Office of Antimicrobial Products
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/

WILEY A CHAMBERS
10/20/2010