## CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: NDA 20-749

# CLINICAL PHARMACOLOGY AND BIOPHARMACEUTICS REVIEW(S)

Terbinafine HCl 1% Topical Solution Lamisil® 1% Spray NDA 20-749

Reviewer: E.D. Bashaw, Pharm.D.

APW

Sandoz Pharmaceutical East Hanover, NJ 07936

Submission Date: Oct. 18, 1996

#### Review of an NDA

#### I. Background

Terbinafine is a broad spectrum antifungal agent belonging to the allylamine family. It exerts its antifungal activity through inhibition of fungal biosynthesis of ergosterol at the point of squalene epoxidation. Cell death follows the disruption of cell membranes and the interruption of cell wall synthesis. Currently terbinafine is available on the U.S. market as an oral 250mg tablet (NDA 20-539) and as a 1% topical cream (NDA 20-192). This NDA is for a new topical formulation of terbinafine as a topical spray.

Chemically, terbinafine is 1-Naphthalenemethanamine, N-(6,6-dimethyl-2-hepten-4-ynyl) -N-methyl-,(E). It is highly lipid soluble and hydrophobic. It is the high degree of lipophilicity that is thought to account for its preferential uptake into the skin but not into plasma.

Terbinafine 1% spray will be indicated for the topical treatment of the following infections: pityriasis versicolor, tinea pedis (athlete's foot), tinea cruris (jock itch), or tinea corporis (ringworm). These indications are the same as for the previously approved terbinafine 1% cream. The 250mg terbinafine tablets are indicated only for the treatment of onychomycosis of the fingernail and toenail caused by dermatophytes.

In support of this new delivery system for terbinafine the applicant has included the results of three in vivo bioavailability studies. These studies evaluate the systemic absorption of terbinafine topical spray in volunteers with normal skin and in subjects with tinea cruris. In addition the sponsor has provided an evaluation of the dermatopharmacokinetics of terbinafine from the spray and the marketed cream.

#### II. Recommendation

This NDA is more of a supplement than a full NDA. The majority of the "classical" pharmacokinetic studies were done with the oral tablet formulation of terbinafine. Given that the exposure to terbinafine from the tablet is almost 1000x that available topically, this NDA concerns itself not with terbinafine pharmacokinetics per se, but with the comparability of the

spray dosage form to the marketed cream. Evaluation of the results of the in vivo pharmacokinetic trials submitted with this NDA indicate that the systemic absorption of terbinafine is uncalculatable being that plasma levels are either below or just at the limit of detection in all samples for parent and metabolite. Data from the 1% cream NDA indicate that it has a bioavailability of approximately 3.5%. The systemic bioavailability of the 1% spray is either equal to or lower than this. As to the dermal penetration, a comparative study of the dermatopharmacokinetics of both the spray and cream dosage forms indicates that the spray penetrates the stratum corneum as well as the cream. As the stratum corneum is the site of the infectious process this suggest and is borne out by clinical trials that the 1% spray should be at least as efficacious as the 1% cream. From a biopharmaceutics standpoint the sponsor has adequately investigated the in vivo pharmacokinetics of the 1% terbinafine spray dosage form.

					IND	EX					
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	SFF-101-E-00 SFF-103-E-00		Bio	availabi	lity in N	lormal :	Skin	*	*	*	4
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SFF-	101-E-00	Bioav	ailabi	lity in N	Jormal !	Skin	*	*	*	2	2
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#### III. PK Studies Overview

As noted above, the sponsor has submitted the results of three in vivo pharmacokinetic studies. These studies evaluate the absorption of terbinafine from a 1% solution in both normal and fungally infected skin. In the development of this NDA the applicant evaluated two different delivery systems for this product, a spray and a dropper dosage form. The two studies (101 and 103) that dealt with systemic absorption used the dropper dosage form of the product. In study 307 the local absorption of terbinafine from both delivery systems was evaluated. Given that terbinafine is highly lipid soluble, that both delivery systems used the same formulation of the product, and that degree of local absorption was similar this should have no impact on the approvability of the 1% spray dosage form.

### Formulation

The formulation detailed below is identical to that used in clinical trials protion of this NDA and in both the dropper and spray versions of the 1% solution. No other "investigational" formulations were utilized. This formulation is identical to the to-be-marketed dosage form.

Ingredient*	Amount	Function
Terbinafine HCl	0.01g	active ingredient
Cetomacrogol 1000**	g	surfactant
Propylene Glycol	g	solvent
Ethanol (96%)	g	solvent, preservative
Water (purified)		solvent
Total	3	

### IV. Analytical Methods

#### Accuracy

The accuracy of the study was based on back calculation of the standard concentrations used to construct the daily standard curves for both parent and metabolite. Over the range of concentrations tested 1g/ml) the assay demonstrated acceptable accuracy.

Terb	inafine	Metabolite		
Target(ng/ml)	Observed (CV%)	Target(ng/ml)	Observed (CV%)	
0	-0.02	0	-0.07	
1378.98	1349.89(0.8%)	1444.77	1413.05(3.7%)	
478.8	492.2(7.3%)	501.68	523.6(6.8%)	
26.84	27.76(5.5%)	28.1	28.51(7.2%)	

### Reproducibility

Likewise for reproducibility, a series of standard concentrations were interspersed randomly throughout the mass of plasma samples to be run. Duplicate samples were included at both at the start of and at the end of the daily sample run for both parent and metabolite. Reproduced below are the results of the analysis of these quality control samples:

Terbi	nafine	Metabolite	Assess		
Target(ng/ml)	Observed (CV%)	Target(ng/ml)	Observed (CV%)		
830.06	827.98(1%)	861.08	863.59(1%)		
207.54	218.73(6.1%)	215.27	226.56(7.3%)		
20.71	20.36(5.8%)	21.56	20.76(5.4%)		
8.27	7.91(9.9%)	8.57	7.69(7.9%)		

Examination of this data suggests that the assay was reproducible from an intra-day standpoint.

#### Sensitivity

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The limit of quantification was defined by the applicant as the lowest concentration on the standard curve or quality control sample for which the accuracy or bias estimate and the precision were below 20%. For this study that value was set at 8ng/ml for both parent and metabolite as this was the lowest quality control sample that was utilized in this study.

### Analytical Summary

The analytical methods utilized by the sponsor were adequately validated and well reported. While this synopsis dealt with the results of trial SFF-101-E-00, a similarly detailed analytical validation report was submitted for each study in the NDA. At the bottom of each of the study summary sheets in Appendix I is summary information on the assay performance in the individual trials.

#### V. Summary of In Vivo Pharmacokinetic Trials

SFF-101-E-00 Bioavailability in Normal Skin

This study was an investigation of the dermal absorption of terbinafine solution following application to normal skin on their inner thigh. A total of 11 normal subjects (3M/8F) were enrolled and completed all phases of the trial. Upon enrollment into the trial a rectangular area of 150cm² was marked off on each subjects inner thigh with an indelible marker. Each subject was instructed to apply 3ml of 1% terbinafine solution to this area once daily in the morning for seven days. During this period of time three 8ml blood samples were collected at baseline (prior to dosing on day 1), immediately before the last dose and two hours following the last dose. Attached in Appendix I (page 2) is study summary sheet that contains detailed information on the subject demographics and study prodcedures.

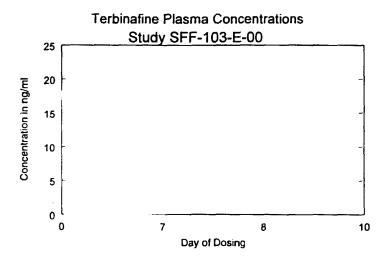
At the conclusion of this trial the 33 plasma samples were analyzed for both parent and metabolite according to the previously described analytical method. No plasma levels were above the limit of quantification (8ng/ml) for either parent or metabolite.

The results of this study suggest that terbinafine is poorly absorbed into the systemic circulation following application to intact normal skin.

SFF-103-E-00 Bioavailability in Subjects with Tinea Cruris

Unlike the previous study, this study was done in subjects suffering from tinea cruris. A total of 10 subjects (all male) were enrolled in the trial and all subjects completed all phases of the trial. Upon enrollment each subject was instructed to apply sufficient 1% solution to cover all of the affected lesions and a 1 inch border of normal skin once daily in the morning. Each subject was given six bottles of drug such that they would use one bottle for one dose only. In doing so the applicant was able to calculate the individual doses administered to each subject. On average the affected area treated in this study was  $59 \text{cm}^2$  (range  $\text{cm}^2$ ). This resulted in an average daily dose of 13.2mg of terbinafine. During this trial 8ml blood samples were collected at baseline (prior to dosing on day 1), immediately before the last dose and two hours following the last dose. Attached in Appendix I (page3-5) are the study summary sheet and supportive data describing the results of this trial.

After 8 days of dosing most of the observed plasma concentrations were either at or below the limit of detection of parent drug and the plasma (see below).



The results of this study gives us some idea of the steady-state plasma levels associated with this formulation of terbinafine. To put these levels in perspective, a single dose of the 250mg oral tablet of terbinafine in NDA 20-539 gave peak plasma levels of 1,796ng/ml (Study SFP-101). In a study with the 1% cream formulation (NDA 20-192) patients suffering from P. versicolor had peak plasma levels of 6ng/ml. While the levels seen here are somehat higher than those observed with the 1% cream, it should be noted that in the 1% cream study no attempt was made to determine the individual dose administered. In addition the data from this study is somewhat limited in that the day 7 data represents a trough level and the day 8 data as two hours after application. At best this study indicates that the systemic absorption of the 1% solution is approximately the same as that following the 1% topical cream and that both topical dosage forms produce steady-state plasma levels that are greatly inferior to those from the oral dosage form.

SFF-307-E-00

Because of the low systemic plasma levels produced by either the cream or spray dosage forms the applicant undertook an evaulation of the uptake of terbinafine into the stratum corneum. The study was done using a rathter complicated study design consisting of six parallel treatment arms (see below):

Trt. Arm	Dosage Form	Dose	Duration		
A-1	Dropper	0.5gm	l day		
A-2	Dropper	0.5gm	7 days		
B-1	Spray	0.5gm	1 day		
B-2	Spray	0.5gm	7 days		
C-1	Cream	0.5gm	1 day		
C-2	Cream	0.5gm	7 days		

Each treatment arm consisted of 3 males and 3 females for a total of 36 subjects. Two subjects dropped out of the trial and were replaced. Attached in Appendix I (pages 6-15) is the Study Summary Sheet and supporting demographic and in vivo data from this trial.

This technique was done following application of the various treatments to a proscribed area on the back of ~190cm². The material was allowed to dry (15min for spray and dropper, 30min for the cream) prior to stripping. Skin stripping was accomplished by applying ul of adhesive to a glass microscope slide. The slide plus adhesive side was then applied to the skin surface and allowed to set for 20-30 sec. On removal of the slide from the skin surface, a layer of stratum corneum 3-4 cell layers thick adhered to the slide. This procedure was repeated five times at each study site to fully remove the stratum corneum. This removal procedure was conducted at time zero, and 4, 8, 12, 24, 48, 72, 96 and 168hrs at a different site for each sample time. In order to standardize the procedure, all samples were obtained by the same person. Once obtained the slides were labeled and frozen at -20C until ready for analysis. Attached as pages 7-13 are the individual study treatment results, reproduced below is a summary table of results for Total extracted drug (skin levels 1-5):

Trt. Arm	Dosage Form	Duration	AUC0-t	Cmax	Half-life	
A-1	A-1 Dropper		7627 (12%)	687 (8%)	15.63 (16%)	
A-2	Dropper	7 days	10437 (14%)	848 (9%)	24.79 (18%)	
Ratio Day 7/Day 1			1.37	1.23	1.59	
B-1	B-1 Spray		7721 (9%)	692 (8%)	14.19 (12%)	
B-2	Spray	7 days	9054 (23%)	780 (17%)	19.92 (38%)	
Ratio	Day 7/Day 1		1.17	1.13	1.41	
C-1	Cream	1 day	8469 (16%)	780 (16%)	20.05(49%)	
C-2	Cream	7 days	9650 (25%)	805 (15%)	17.6 (29%)	
Ratio	Ratio Day 7/Day 1		1.14	1.03	0.88	

Although a bioequivalency determination was not done on this data, it is clear from examination of the raw data and plots that the spray and cream dosage forms are very similar in their penetration of dermal tissues. The dropper dosage form (not being pursued at this time) does seem to deliver more drug to the tissues than the spray or cream dosage forms. While no clear explanation is readily available for this difference it should be noted that the spray and dropper dosage forms use the same formulation of terbinafine solution (thereby ruling out formulation effects). In addition, as the dropper dosage form was used in studies SFF-101 and -103, the systemic exposure seen in those studies would be to the extreme side of those produced by the spray dosage form.

#### VI. Conclusions

As noted earlier in this review, this NDA is in reality a line extension of the Lamisil® product line. Terbinafine is currently avialable as an oral tablet and as a 1% cream. The solution dosage form is intended to provide consumers and practitioners another route of administration for patient convenience. From a pharmacokinetic standpoint, terbinafine is poorly absorbed into the systemic circulation. The applicant has postulated in their NDA that the high lipid solubility of terbinafine has the net result of localizing it in the dermal tissues, rather than being taken up into the systemic circulation. From a pharmacokinetic standpoint the applicant has demonstrated that systemic absorption is increased in diseased skin, and that the resulting plasma levels are markedly inferior to the oral product. In relation to the topical cream, terbinafine solution as a spray appears to taken up to the same extent as the cream in all layers of the stratum corneum. While a bioequivalency determination was not done (nor would it be appropriate) the steady-state bioavailability in the stratum corneum for the 1% spray was 94% (based on day 7 AUC values). Given that more detailed pharmacokinetics have been done with the approved oral tablet and given that the plasma and stratum corneum levels of the product are similar to the approved cream, no additional pharmacokinetic information is required for approval.

9//6/97
E. Dennis Bashaw, Pharm.D.
Senior Pharmacokineticist (HFD-550)
Division of Pharmaceutical Evaluation-III

Secondary Review, John Lazor, Pharm.D.

8/22/17

CC: NDA 20-749 (ORIG),

HFD-540/DIV File

HFD-540/CSO/Cross

HFD-880(Bashaw)

HFD-880(Lazor)

CDR. ATTN: B. Murphy HFD-344(Viswanathan)

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# **Appendix I-Studies**

Study #	Short Summary Title		Page No.
SFF-101-E-00	Bioavailability in Normal Skin * *	*	2
SFF-103-E-00	Bioavailabilitiy in Subjects with Tinea Cruris	*	3
SFF-307-E-00	Dermatopharmacokinetics of 1% Cream and 1% Sp	oray	6

N/DA/IND	# 20-7	49 Suppl/A	Amend# Orig.	Submission Date:	10/13	8/96	Volume:	1.7
hdy Typ	e: Bioa	vailability		Study#	SFF-	101-E-00		
Study Title	e: Plasi	na Concenti	ations of Terbina	fine Following 1%	Topic	cal Solutio	n for 7 Days	
Clinical In	vestigat	or		Analytica Site	l Inves	stigator		
				•				
Single Dos	se:	Multiple Do	ose: Y Washo	out Period: N				
Cross-Ove	er	Parallel	Other :	Design: Single	Treatr	nent		
Fasted 1	VA Foo	d Study N	FDA High Fa	t Breakfast	_			
If fasted, h	ow long	g (hrs.)?						
			Subject Break	kdown				
Normal X	X Pati	ients	Young XX Eld	lerly Rena		_ Hepatic		
	Su	bject Type	Males	Group All	_N=	11 M=	=3 F=	8
Weight	Mean	76.5 Rang	e kg.	Group	_N= .	M=	F=	
Age	Mean	35 Rang	e yrs.	Group	N= .	M=	<del></del>	
)		bject Type	Females	Group	_N=	M=		
Weight	Mean	55.7 Rang		Group	_N=	M=		
Age	Mean	30.6 Rang	e yrs.	Group	_N=	M=	F=	
Treatment	Group	Dose	Dosage Form	Strength	•	Lot#	I.c	ot Size
All Sub		3ml	Topical Solution			08-0492		A BIZE
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	3	100.00.					-
					· · · · · · · · · · · · · · · · · · ·			
	<del></del>							
L		<b>.</b>	Sam	pling Times				
Plasma	8ml, at	baseline (be		ion), immediately	before	and 2 hrs	after last app	plication
Urine	N/A							
Feces	N/A							
Assay Me	thod:							
Assay Sen	sitivity	8ng/ml lim	nit of quantification	on	ļii .			
^ssay Acc	curacy	Target Obs	s. %CV;830 827 1	%;207.5 218.7 6.1	%;20.7	7 20.4 5.8%	6;8.3 7.9 9.99	<del>/</del> 6
Labeling ( From Stu	dy	skin on the	•	cal application of a tectable levels of t		•		

ady Ty	pe: Bio	availability		Submission Date: Study # fine Following 19		103-E-00	Volume:	in Tinea Cruris
Clinical I Site	nvestiga	tor		Analytica Site	al Inves	stigator 		-
Single Do	ose:	Multiple D	ose: Y Washo	out Period: N				
Cross-Ov	er	Parallel	Other 1	Design: Single	Treatr	nent		
Fasted	n/a Foo	d Study	FDA High Fat	t Breakfast				
If fasted,	how lon	g (hrs.)?			_			
Normal 1	XX Pa	tients	Subject Breal Young XX Eld		I	Hepatic		
_	 Sı	ıbject Type	Males	Group All	N=	10 M=	10 F=	
Weight	Mean	76.3 Rang	ge kg	Group	N=	M=	F=	
Age	Mean	37.9 Rang	ge yrs.	Group	_N=	M=	F=	
)	Sı	bject Type		Group	N=	M=	F=	
Weight	Mean	Rang	ge	Group	N=	M=	F=	
Age	Mean	Rang	ge	Group	N=	M=	F=	
Treatmen	t Group	Dose	Dosage Form	Strength		Lot#	Lo	ot Size
All Su	bjects	Varies	Topical Solution	1%	Y6	08-0492		
<u> </u>		1	Som	nling Times				
Plasma	8ml. at	baseline (be	Sam efore first applicati	pling Times	before	and 2 hrs a	ifter last ann	lication
Urine	N/A	(0.		,,			Test upp	
Feces	N/A		-					
Assay Me	ethod:							
Assay Se		(Limit of (	Quantification) Par	rent 4.8ng/ml, Me	tabolite	e 5.1ng/ml		
^ssay Ac	curacy		s. %CV;111.9 102	<del></del>			.6%;1.4 1.14	147.8%
Labeling From Str		mentagroph to the affect	0 subjects were en sytes (2) and E. flo ted areas a clinical nts. Plasma levels	ccosum (2). Follo cure (negative sig	owing s gns, syr	seven days nptoms, an	of once daily d culture) w	y administration as observed in

**Project**: HPLC Determination of SF 86-327 and 86-621 in Plasma (Tinea cruris) 29 March 1995 Appendix / page 17/17 Study: Final Study Report 1111

CHROM 1

Typical chromatograms for the determination of terbinafine (SF 86-327) and metabolite 86-621 in human plasma

Subject day 0 (patient's blank) Α

day 7

В Subject

C Calibration standard (C-00), blank

(SF 86-327)

**terbinafine** 

Individual plasma concentrations of terbinafine (SF 86-327) Project: SDZ 86-327 Study: SFF 103

Time  $\{day\} \rightarrow 0.0$  7.0 8.0 Subjects

\* concentration below limit of quantification ng/mL)

> Individual plasma concentrations of metabolite 86-621 Project: SDZ 86-327 Study: SFF 103

8.0 Time [days]-> 0.0 7.0 Subjects

concentration below limit of quantification ng/mL)

NDA/IND# 20-	749 Suppl/.	Amend.# Orig. Su	ibmission Date:	: 10/18/97	Volume:	1.8
lidy Type: Bio	avilability	St	udy#	SFF-307-E-00		
Study Title: Bio	availability (	Comparison of Terb	inafine From T	wo Topical Delive	ry Devices and Crear	n.
Clinical Investiga	itor		Analytical li	nvestigator		
Site			Site	ivedigator		
Site			Site	•		
	<del></del>					
Single Dose:	Multiple D	ose: Y Washou	t Period: N			
Cross-Over	_Parallel	Y Other De	esign:			
Fasted n/a Foo	od Study	FDA High Fat I	Breakfast			
If fasted, how lon	g (hrs.)?					
		Subject Breakd	lown			
Normal XX Pa	tients	Young XX Elder	rly Rena	al Hepatic		
	<del></del>					
	See A	ttachment for detail	ed breakdown o	of subject demogra	phics	
Treatment Group	Dose	Dosage Form	Strength	Lot#	Lot Size	
Cream	0.5gm	Cream	1%	Y6130594		
Spray	~0.5gm*	Solution Spray	.1%	Z0250992		
Dropper	~0.5gm*	Solution Dropper	1%	Y6140594		
*dose equal to 0.5ml=0.	4845gm using a	density of 0.969gm/ml (de	osed as 20-22 drops	or 5-6sprays)		
Note: This study	was designe	d as a six group stud	ly in 36 patients	s. Each group con	sisted to six subjects	(3M/3F).
The group	s were furthe	er divided by dosage	e form, with tw	o groups (12 subje	ects) each receiving o	one of the
					pplication to two are	as on the
back (each	measuring.	3x5in.) while the otl	ner group receiv	ved a single daily d	lose for seven days.	
		Skin Samp	ling Times			
Day 1(all) prior	to dosing, as	nd 4, 8, 12, 24, 48, 7	72, 96, and 1681	hrs (7 days) after la	ast dose	
Day 3&5 prior	to dosing or	days 3 and 5				
Day 7 prior	to dosing, a	nd 4, 8, 12, 24, 48,	72, 96, and 168	hrs (7 days) after la	ast dose	
Assay Method:		_				
Assay Sensitivity (Limit of Quantification) 7.3ng/ssb						
Assay Accuracy	Target Ob:	s. %CV;3000 3503	8.8%; 2500 253	34 2.9%; 2000 1925	5 8.4%;	
)		1000 1121.5	5 6.9%; 250 256	.9 9.4%; 12.5 12.5	5 6.1%;	
			_			
		rneum concentration		-		
From Study	between the	ing the treatment gro	oups and no sign	nificant difference	s were noted	

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• . . .

Table 2.1
Summary of Baseline Demographics
(Population: Randomised Subjects)

Treatment Group

		Lamisil Solu	tion Dropper	Lamisil Sol	ution Spray	Lamisil Cream		
		One Day (N=6)	Seven Days (N=6)	One Day (N=7)	Seven Days (N=7)	One Day (N=6)	Seven Days (N=6)	
Age (years)	N Hean Hedian s.d. Minimum Maximum	6 32.3 27.0 16.18 19	6 34.8 35.0 12.32 22	7 31.0 28.0 9.76 22 46	7 31.6 23.0 12.46 20	6 35.2 37.0 5.38 28	6 32.7 32.5 8.14 24	
Sex	Hale Female	3 ( 50.0%) 3 ( 50.0%)	3 ( 50.0%) 3 ( 50.0%)	3 ( 42.9%) 4 ( 57.1%)	3 ( 42.9%) 4 ( 57.1%)	3 ( 50.0%) 3 ( 50.0%)	3 { 50.0%} 3 { 50.0%}	
Race	Caucasian Black	6 {100.0%} 0 { 0.0%}	6 (100.0%) 0 ( 0.0%)	6 ( 85.7%) 1 ( 14.3%)	7 (100.0%) 0 ( 0.0%)	6 (100.0%) 0 ( 0.0%)	6 (100.0%) 0 ( 0.0%)	
Height (cm)	N Hean Hedian s.d. Hinlmum Haximum	170.7 171.5 9.48 155	6 171.0 170.0 14.03 157	7 166.6 155.0 15.25 155	7 174 1 175 0 12.56 158	6 172.8 175.5 7.11 160 178	169.5 175.0 15.18	
Weight (kg)	N Mean Madian s.d. Minimum Maximum	6 58.67 71.50 11.255 49.0 79.0	6 68.83 72.50 15.303 48.0 85.0	7 74.50 69.00 9.206 64.0 85.0	7 69.36 66.00 12.944 49.0 83.5	6 66.00 64.00 6.197 58.0 76.0	6 63.33 66.00 11.112 49.0 76.0	

11

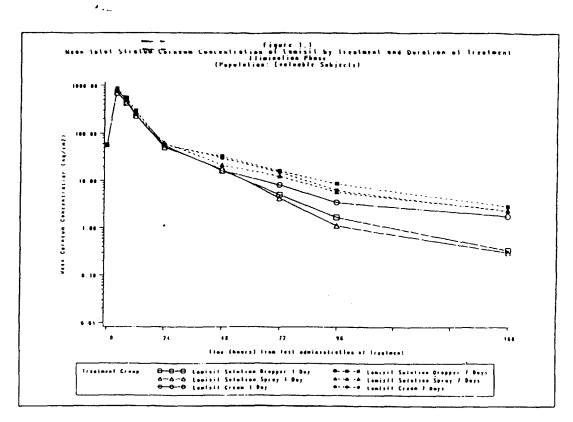


Table 3.1.1.1

Summary of Total Stratum Corneum Concentrations (ng/cm2)

(One Day Treatment Duration)

(Population: Evaluable Subjects)

					Time (h	rs)				
1		0		8	12	24	48	72	96	168
misil Solution Dropper (N=6)	r N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.0000	6 686.992 682.475 52.0667	6 422.060 443.585 77.5962	6 226.300 245.325 50.1691	6 54.950 56.965 12.7161	6 14.012 12.265 8.2398	6 1.603 0.000 2.5570	6 0.365 0.000 0.8941	6 0.000 0.000 0.000
.amisil Solution spray (N=6)	N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.000	6 692.088 671.085 56.4852	6 448.490 420.090 60.9523	6 227.637 233.140 54.1746	: 6 50.132 55.600 13.8376	6 15.280 11.290 10.8284	6 2.888 2.145 3.3242	6 0.000 0.000 0.0000	6 0.000 0.000 0.000
.amisil Cream (N=6)	N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.000	6 780.045 754.535 127.4180	6 503.603 477.515 85.3947	6 227.573 226.940 46.1381	6 54.510 54.735 12.2229	6 14.455 16.375 6.9668	6 5.177 5.550 4.8903	6 0.947 0.000 1.5087	6 0.460 0.000 1.1268

	Treatment Duration)	(ng/cm2)
(Population:	Evaluable Subjects)	

					(1.00011			,,						
			Time (hrs)											
			-144	-96	-48	0	4	8	12	24	48	72	96	168
Lamisil Solution ( (N=6)		N Mean Median s.d. Minimum Maximum		6 40.898 39.740 8.6917	6 49.513 49.785 6.6707	6 58.212 55.870 10.1169	6 848.307 827.050 79.6556	6 539.298 534.460 74.5125	6 290.345 312.815 54.6062	6 56.257 57.060 10.6570	6 31.913 35.640 10.6626	6 14.485 17.050 7.3175	6 6.427 7.375 3.9558	6 0.363 0.000 0.8900
Lamisil Solution s (N=6)	:	N Mean Median s.d. Minimum Maximum		6 46.505 45.480 5.9307	6 52.030 50.625 4.4594			6 470.157 469.435 75.4231	6 240.232 243.315 69.3444	6 62.422 57.960 25.2454	6 20.642 21.210 9.2879	6 9.652 10.150 7.2773	6 3.473 2.375 3.6975	6 0.000 0.000 0.000
Lamisil Cream (N-6)		N Mean Median s.d. Minimum Maximum		6 45.488 43.300 6.3645	6 51.687 51.920 8.7016	6 54.092 51.250 8.8731	6 805.417 806.450 118.6961	6 475.848 454.190 127.4865	6 272.782 261.030 98.7252	6 58.193 54.740 16.1283	6 29.627 31.810 9.1213	6 13.068 14.210 8.1350	6 3.383 2.345 3.8674	6 0.000 0.000 0.000

<sup>1) 0</sup> hrs corresponds to the time of the skin sample taken immediately prior to the last application of study medication.

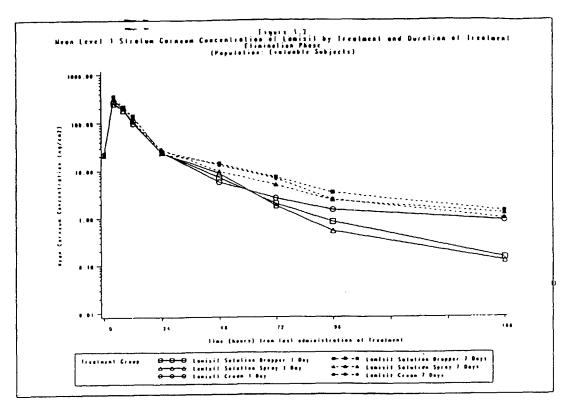


Table 3.2.1.1

Summary of Level 1 Stratum Corneum Concentrations (ng/cm2)

{One Day Treatment Duration}

{Population: Evaluable Subjects}

,		Time (hrs)										
<u></u>		0	4	8	12	24	48	72	96	168		
Lamisil Solution Droppe (N=6)	r N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.000	6 265.038 264.905 19.6167	6 178.625 182.750 30.0130	6 98.602 103.180 16.9842	6 23.405 21.590 7.0189	6 7.065 6.155 3.9265	6 1.215 0.000 1.8867	6 0.365 0.000 0.8941	6 0.000 0.000 0.000		
Lamisil Solution spray (N=6)	N Median s.d. Minimum Maximum	6 0.000 0.000 0.000	6 246.528 247.100 26.6103	6 181.348 176.275 22.0546	6 97.925 94.610 26.5886	6 23.133 22.890 3.2469	6 8.630 6.670 5.6062	6 1.475 1.140 1.6611	6 0.000 0.000 0.0000	6 0.000 0.000 0.000		
Lamisil Cream (N=6)	N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.000	6 286.320 289.685 57.9081	6 198.417 198.800 24.4260	6 95.145 93.935 24.4087	6 23.523 23.455 6.0134	6 5.643 5.850 1.7618	6 2.425 3.115 1.9866	6 0.947 0.000 1.5087	6 0.460 0.000 1.1268		

Summary of Level 1 Stratum Corneum Concentrations (ng/cm2) (Seven Days Treatment Duration) (Population: Evaluable Subjects)

			Time (hrs)											
			-144	-96	-48	0	4		12	24	48	72	96	168
Lamisil (N=6)	Solution Dropper	N Mean Median s.d. Minimur Maximur		6 16.948 17.320 2.4624	6 19.535 19.685 0.8728		6 348.890 341.895 41.1784	6 213.542 215.125 34.6005	6 137.528 148.205 37.8048	6 22.272 22.570 3.1712	6 13.775 14.180 5.5470	6 6.897 7.680 4.1621	6 3.397 3.715 2.1585	6 0.363 0.000 0.8900
التانان	Solution spray	N Mean Median s.d. Minimum Maximum		6 18.398 17.180 3.6946	6 20,847 20,575 2,0364	6 21.063 20.775 1.3982	6 315.593 309.890 22.4414	6 192.927 196.925 25.5055	6 103.757 106.475 32.3279	27.340 23.010 15.1067	6 9.470 8.365 3.8749	6 4.720 5.270 2.9383	6 1.965 2.375 1.6247	6 0.000 0.000 0.0000
Lamisil (N=6)	Cream	N Mean Median a.d. Minimum Maximum		6 18.852 18.735 1.7973	6 20.163 19.540 1.8002	6 21.810 21.705 1.0606	6 310.150 313.220 56.3364	6 207.283 202.720 51.0101	6 124.272 135.665 42.2166	6 25.640 22.530 11.1825	6 12.938 15.100 4.8759	6 6.630 6.225 3.8178	6 2.205 2.345 2.0399	6 0.000 0.000 0.000

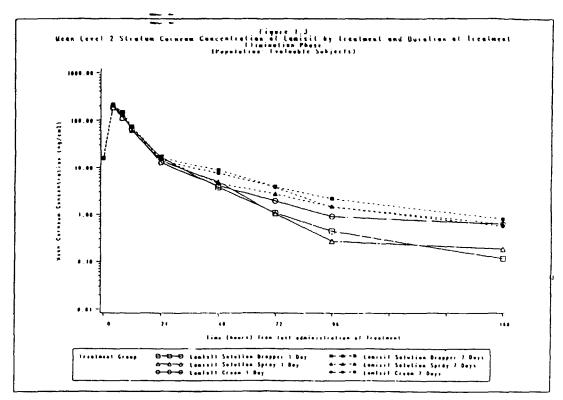


Table 3.3.1.1

Summary of Level 2 Stratum Cornaum Concentrations (ng/cm2)
(One Day Treatment Duration)
(Population: Evaluable Subjects)

,			Time (hrs)										
)		0	4	8	12	24	48	72	96	168			
Lamisil Solution Droppes (N=6)	r N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.0000	6 187;223 184.525 16.9742	6 110.935 119.350 24.2342	6 65.867 75.165 18.1926	6 16.240 17.590 4.7945	6 3.435 3.535 2.0762	6 0.000 0.000 0.000	6 0.000 0.000 0.000	6 0.000 0.000 0.000			
Lamisil Solution spray (N=6)	N Mean Hedian s.d. Minimum Maximum	6 0.000 0.000 0.000	6 188.890 190.855 20.8744	6 129.602 135.900 24.5888	6 60.690 60.490 23.2467	6 13.808 14.775 3.3100	6 4.343 3.800 4.9067	6 0.688 0.000 1.0664	6 0.000 0.000 0.000	6 0.000 0.000 0.000			
Lamisil Cream (N=6)	N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.000	6 206.722 200.240 20.1696	6 143.408 146.130 16.5421	60.887 58.065 11.8495	6 12.557 12.360 2.3602	6 3.642 4.275 2.1297	6 1.530 1.305 1.6949	6 0.000 0.000 0.0000	6 0.000 0.000 0.000			

# Summary of Level 2 Stratum Corneum Concentrations (ng/cm2) (Seven Days Treatment Duration) (Population: Evaluable Subjects)

		Time (hrs)											
		-144	-96	-48	G	4	•	12	24	48	72	96	168
Lamisil Solution Dropper (N=6)	N Mean Median s.d. Minimum Maximum		6 11.722 12.790 3.1517	6 13.983 13.750 1.3779	6 15.630 14.965 3.5010		6 148.650 139.870 30.9634	6 73.188 73.045 17.8358	6 16.075 16.475 2.4187	6 8.663 8.970 3.0733	6 3.673 4.385 1.8808	6 1.860 2.480 1.4673	6 0.000 0.000 0.000
Lamisil Solution spray (N=6)	N Mean Median a.d. Minimum Maximum		6 12.267 11.280 2.0357	6 14.542 13.495 3.1535	6 15.725 15.710 3.3068	6 213.812 213.915 35.0494	6 125.692 129.475 16.3349	6 58.787 61.470 14.1590	6 16.060 16.120 4.7055	6 4.473 4.420 1.6532	6 2.205 2.625 1.9024	6 0.797 0.000 1.2562	6 0.000 0.000 0.000
-amisil Cream (N=6)	N Mean Median s.d. Minimum Maximum		6 13.555 13.505 1.8692	6 15.718 15.115 2.2511	6 15.043 15.125 2.1826	6 209.238 210.500 33.5082	6 128.042 125.535 30.8028	6 71.060 60.600 33.6062	6 14.378- 15.080 2.1101	6 7.390 6.855 3.1143	6 3.485 3.515 2.2046	6 0.423 0.000 1.0370	6 0.000 0.000 0.000

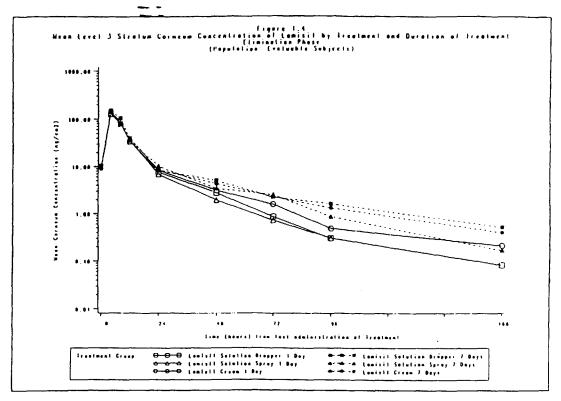


Table 3.4.1.1

Summary of Level 3 Stratum Corneum Concentrations (ng/cm2)
(One Day Treatment Duration)
(Population: Evaluable Subjects)

)					Time	(hrs)				
,		0	4	8	12	24	48	72	96	168
Lamisil Solution Dropper (N=6)	N Mean Median s.d., Minimum Maximum	6 0.000 0.000 0.0000	6 125.133 117.735 18.5198	6 76,933 80,940 20,1639	6 33.150 37.645 11.7545	6 7.778 6.280 3.7392	6 2,312 2.845 1.8776	6 0.388 0.000 0.9512	6 0.000 0.000 0.000	6 0.000 0.000 0.000
Lamisil Solution spray (N=6)	N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.000	6 132,403 133,495 15,9515	6 80.202 78.345 10.3257	6 . 34.182 32.800 5.2313	6 6.928 7.040 3.9087	6 1.478 1.160 1.7107	6 0.390 0.000 0.9553	6 0.000 0.000 0.000	6 0.000 0.000 0.000
Lamisil Cream (N=6)	N Mean Median a.d. Minimum Maximum	6 0.000 0.000 0.000	6 143.462 140.285 21.7680	6 86.447 84.865 18.6283	6 33.765 34.145 7.2696	6 8.448 7.940 2.2505	6 2.515 3.395 2.0000	6 1,222 1,130 1,3431	6 0.000 0.000 0.000	6 0.000 0.000 0.0000

Summary of Level 3 Stratum Corneum Concentrations (ng/cm2) (Seven Days Treatment Duration) (Population: Evaluable Subjects)

		Time (hrs)											
		-144	-96	-40	0	4	8	12	24	48	72	96	168
Lamisil Solution Dropper (N=6)	N Mean Median a.d. Minimum Maximum		6 5.990 5.380 1.5427	6 8.942 8.285 2.8557	6 10.477 9.540 3.7382	6 147.625 149.890 18.6028	6 103,328 99,500 23,4868	6 39.037 36.725 11.3411	6 8.597 8.415 3.2741	6 4.958 5.575 1.3194	6 2.247 2.440 1.2074	6 1.170 1.000 1.3150	6 0.000 0.000 0.000
Sail Solution apray	N Mean Median s.d. Minimum Maximum		6 7.540 7.590 1.3604	6 8.975 9.360 1.0585	6 10.020 9.595 1.7259	6 140.697 147.775 31.4352	6 80.382 86.520 18.1986	6 34.758 37.600 14.9046	6 10.425 10.830 4.2721	6 3.253 3.925 1.6974	6 1.965 1.705 2.1766	6 0.363 0.000 0.8900	6 0.000 0.000 0.000
Lamisil Cream (N=6)	N Mean Median s.d. Minimum Maximum		6 6.357 5.910 2.0629	6 8.480 8:605 3.0562	6 8.838 7.555 2.4470	6 146.957 151.515 25.0898	6 79.103 77.665 23.8717	6 38.702 32.080 15.6522	6 8.678 7.905 2.4404	6 4.290 3.925 1.6273	6 1.533 1.310 1.7393	6 0.755 0.000 1.1709	6 0.000 0.000 0.000

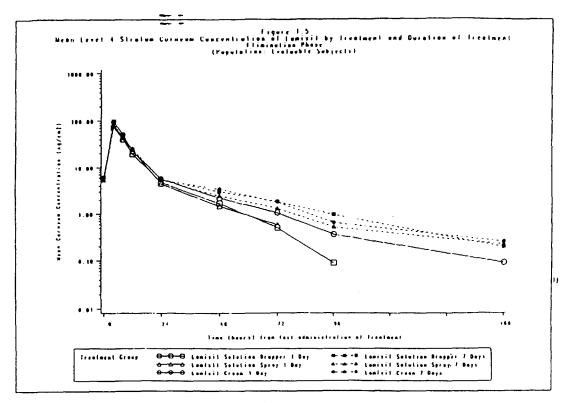


Table 3.5.1.1

Summary of Level 4 Stratum Corneum Concentrations (ng/cm2)

(One Day Treatment Duration)

(Population: Evaluable Subjects)

Time (hrs) 72 168 24 48 96 0 4 8 12 6 19.020 20.385 9.2671 6 4.480 4.325 3.2273 6 0.000 0.000 6 0.000 0.000 6 Lamisil Solution Dropper N 0.000 0.000 0.0000 38,897 35,785 12,0448 72.020 71.505 7.0182 Mean Median 0.000 (N-6) 0.000 1.2678 0.000 0.0000 0.0000 0.0000 s.d. Minimum Maximum 6 39.677 45.600 21.7213 6 3.995 4.660 3.4358 6 0.335 0.000 6 0.000 0.000 6 22.707 6 0.828 6 6 Lamisil Solution spray (N=6) 80.820 17.000 13.2376 0.000 0.000 Median s.d. Minimum 0.0000 13.5401 Haximum 6 5.737 5.270 2.0852 6 1.483 1.170 1.6620 6 94.010 90.235 6 21.580 20.915 6 0.000 6 6 6 50,240 44,235 6 Lamisil Cream Mean (N=6) 0.000 0.000 0.000 0.000 Median s.d. Minimum 0.0000 Maximum

> Summary of Level 4 Stratum Corneum Concentrations (ng/cm2) (Seven Days Treatment Duration) (Population: Evaluable Subjects)

			Time (hrm)										
		-144	-96	-41	0	4	8	12	24	48	72	96	168
Lamisil Solution Dropper (N=6)	N Mean Median s.d. Minimum Maximum		6 4.498 4.570 1.3187	6 4.613 3.900 1.6960	6 6.140 5.785 2.2886	6 95.312 89.270 19.6829	6 50.092 46.805 15.3961	6 23.953 23.935 6.6124	6 5.550 5.225 1.8914	6 2.770 3.065 1.5512	6 0.985 0.000 1.5309	6 0.000 0.000 0.000	6 0.000 0.000 0.000
Lamisil Solution spray	Mean Median s.d. Minimum Maximum		6 5.022 4.885 1.1245	6 5.053 4.915 0.9213	6 5.347 5.345 1.0884	6 74.037 79.195 37.7259	6 45,472 42,780 21,7525	6 24.928 25.295 14.1500	6 5.452 5.495 2.2558	6 2.122 2.600 1.7828	6 0.762 0.000 1.1800	6 0.000 0.000 0.000	6 0.000 0.000 0.000
Lamisil Cream (N=6)	N Mean Median s.d. Minimum Maximum		6 4.773 4.065 2.2198	6 5.113 4.270 2.0392	6 5.743 4.880 2.4757	6 89.750 86.950 21.8718	6 41,870 37,065 19,5150	6 23.528 20.785 8.9446	6 5.402 5.360 0.6946	6 3.385 3.180 0.7180	6 0.973 0.000 1.5433	6 0.000 0.000 0.000	6 0.000 0.000 0.0000

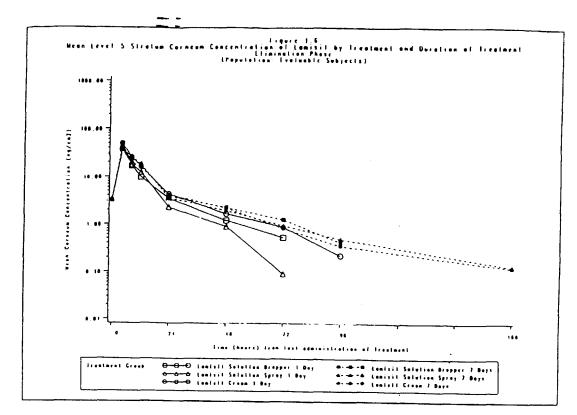


Table 3.6.1.1

Summary of Level 5 Stratum Corneum Concentrations (ng/cm2)
(One Day Treatment Duration)
(Population: Evaluable Subjects)

)					Time	(hrs)				
<i>1</i>		0	4	8	12	24	48	72	96	168
Lamiail Solution Dropper (N=6)	N Mean Median a.d. Minimum Maximum	6 0.000 0.000 0.000	6 37.577 38.225 8.6650	6 16.670 13.975 8.9470	6 9.662 9.560 5.7864	6 3.047 2.960 3.0421	6 0.382 0.000 0.9349	6 0.000 0.000 0.000	6 0.000 0.000 0.000	6 0.000 0.000 0.000
Lamisil Solution spray (N=6)	N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.000	6 43.447 43.500 14.1817	\$ 17.662 14.685 12.4316	6 12.133 10.625 6.1783	6 2.267 2.430 2.1435	6 0.000 0.000 0.000	6 0.000 0.000 0.000	6 0.000 0.000 0.000	6 0.000 0.000 0.000
Lamisil Cream (N=6)	N Mean Median s.d. Minimum Maximum	6 0.000 0.000 0.000	6 49.532 48.255 13.0370	6 25.092 18.605 17.7675	6 16.197 14.795 7.3138	6 4.245 4.060 1.3333	6 1.172 1.085 1.2880	6 0.000 0.000 0.000	6 0.000 0.000 0.000	6 0.000 0.000 0.000

Summary of Level 5 Stratum Corneum Concentrations (ng/cm2) (Seven Days Treatment Duration) (Population: Evaluable Subjects)

		Time (hrs)											
		-144	-96	-48	0	4	8	12	24	48	72	96	168
Lamisil Solution Dropper (N=6)	N Mean Median s.d. Minimum Maximum		6 1.740 1.140 2.0328	6 2.440 2.320 1.4512	6 3.108 2.555 1.0890	6 40.320 38.380 9.4172	6 23.687 23.015 9.1337	6 16.638 14.385 4.5560	6 3.763 3.370 1.1893	6 1.747 2.455 1.3681	6 0.683 0.000 1.0591	6 0.000 0.000 0.0000	6 0.000 0.000 0.000
Solution spray	N Mean Median s.d. Minimum Maximum		6 3.278 3.060 0.9819	6 2.613 3.005 1.3398	6 3.383 3.275 0.5438	6 36.735 37.100 17.0866	6 25.685 20.795 15.4779	6 18.002 18.370 9.1415	6 3.145 3.525 1.6560	6 1.323 1.170 1.4760	6 0.000 0.000 0.000	6 0.348 0.000 0.8532	6 0.000 0.000 0.000
Lamisil Cream (N=6)	N Mean Median s.d. Minimum Maximum		6 1.952 2.510 1.5941	6 2.212 2.400 2.1053	6 2.657 2.545 2.4449	6 49.322 47.535 17.9681	6 19.550 15.735 10.6464	6 15.220 13.120 7.3210	6 4.095 4.160 0.9598	6 1.623 2.120 1.3154	6 0.447 0.000 1.0941	6 0.000 0.000 0.000	6 0.000 0.000 0.000

TABLE 1

TOTAL STRATUM CORNEUM PHARMACOKINETIC PARAMETERS												
	Lamisil® Solution Lamisil® Solution Lamisil®  Dropper Spray Cream											
	1 Day	7 Days	1 Day	7 Days	1 Day	7 Days						
No. of Subjects	6	6	6	6	6	6						
AUC <sub>0-1</sub> (ng•hr/cm²) mean s.d.	7,628 941	10,437 1,465	7,722 680	9,054 2,116	8,470 1,389	9,650 2,363						
C <sub>max</sub> (ng/cm²) mean s.d.	687 52	848 80	692 56	781 132	780 127	805 119						
t <sub>%</sub> (hrs) mean s.d.	n=2# 15.6 2.5	n=5 24.8 4.4	n=3# 14.2 1.8	n=5# 19.9 7.6	n=4# 20.1 9.9	n=6 17.6 5.1						

#-Missing subjects had terbinafine levels detectable at <3 timepoints during the elimination phase. Source: Appendix 1

TABLE 2

COMPARISON OF PHARMACOKINETIC PARAMETERS - P VALUES#							
	AUC <sub>04</sub>	C <sub>max</sub>	t <sub>%</sub>				
Lamisil® Solution Dropper vs. Cream							
1 day	0.345	0.124	0.424				
7 days	0.377	0.446	0.073 (*)				
Lamisik® Solution Spray vs. Cream							
1 day	0.426	0.147	0.235				
7 days	0.542	0.652	0.547				
Lamisil® Solution Dropper vs. Spray							
1 day	0.879	0.925	0.804				
7 days	0.140	0.229	0.234				
1 day vs. 7 days:							
Lamisil® Solution Dropper	0.005**	0.009**	0.096 (*)				
Lamisil® Solution Spray	0.194	0.148	0.225 (*)				
Lamisil® Cream	0.264	0.653	0.550				

<sup>#</sup> The p-values correspond to Student's t-test

Source: Appendix 1

<sup>\*\*\*</sup> p<0.001, \*\* 0.001≤p<0.01, \* 0.01≤p≤0.05, (\*) 0.05≤p<0.10

	Lamisil Sol	Lamisil Solution Dropper		Lamisil Solution Spray		Lamisil Cream	
	One Day (N=6)	Seven Days (N=6)	One Day (N-6)	Seven Days (N-6)	One Day (N=6)	Seven Days (N=6)	
N Hean Median s.d. Minimum Maximum	7627.987 7956.670 940.5621	6 10437.343 11079.080 1465.4694	6 7721.017 7514.720 ; 680.4030	6 9054,400 9404,930 2115,7949	6 8469.520 8521.050 1388.6896	6 9650.057 9368.390 2363.1862	
Comparison		Geometric Hean Ratio	95	Confidence Int	erval p-value		
Lamisil Solution Dropper vs. Cream:	1 day 7 days	0.91 1.10		0.73, 1.12) 0.89, 1.36)	0.345 0.377		
Lamisil Solution Spray vs. Cream:	l day 7 days	0.92		0.74, 1.34) 0.76, 1.16)	0.426 0.542		
Lamisil Solution Dropper vs. Spray:	l day 7 days	0.98 1.17		0.80, 1.22) 0.95, 1.45)	0.879 0.140		
l day vs. 7 days:	Lamisil Solution Dropper Lamisil Solution Spray Lamisil Cream	0.73 0.87 0.89	(.)	0.59, 0.91) 0.70, 1.08) 0.72, 1.10)	0.005 0.194 0.264	••	

1.\_

# Table 3.1.2.2 Summary of Total-Stratum Corneum Pharmacokinetic Parameters: Cmax (ng/cm2) (Population: Evaluable Subjects)

		Treatment	Group
-	 	 	

	,						
	Lamisil Solu	Lamisil Solution Dropper		Lamisil Solution Spray		Lamisil Cream	
	One Day (N=6)	Seven Days (N=6)	One Day (N=6)	Seven Days (N=6)	One Day (N=6)	Seven Days (N=6)	
N Mean Median s.d. Minimum Haximum	6 686.992 682.475 52.0667	6 848.307 827.050 79.6556	692.088 671.085 56.4852	6 780.873 812.675 131.5753	6 780.045 754.535 127.4180	6 805.417 806.450 118.6961	
Comparison		Geometric Hean Ratio	95	58 Confidence Int	erval p-value		
Lamisil Solution Dropper vs. Cream:	l day 7 days	0.89		0.76, 1.03) 0.91, 1.23)	0.124 0.446		
Lamisil Solution Spray vs. Cream:	l day 7 days	0.89 0.97		0.77, 1.04) 0.83, 1.13)	0.147 0.652		
Lamisil Solution Dropper vs. Spray:	1 day 7 days	0.99		0.85, 1.16) 0.94, 1.28)	0.925 0.229		
1 day vs. ? days:	Lamisil Solution Dropper Lamisil Solution Spray Lamisil Cream	0.81 0.89 0.97	i	0.70, 0.94) 0.77, 1.04) 0.83, 1.13)	0.009 0.148 0.653	••	

# Table 3.1.2.4 Summary of Total Stratum Corneum Pharmacokinetic Parameters: t1/2 (hrs) Population: (Evaluable Subjects)

#### Treatment Group

	Lamisil Sol	Lamisil Solution Dropper		Lamisil Solution Spray		Lamisil Cream	
	One Day (N=6)	Seven Days (N=6)	One Day (N=6)	Seven Days (N=6)	One Day (N=6)	Seven Days (N=6)	
N Mean Median s.d. Minimum Maximum	2 15.63 15.63 2.538	5 24.79 25.42 4.423	3 14.19 13.50 1.756	5 19.92 18.61 7.620	4 20.05 17.23 9.876	6 17.60 17.69 5.051	
Comparison		Hean Difference		95% Confidence Inter	val p-value		
Lamisil Solution Dropper vs. Cream:	l day 7 days	-4.43 7.19		(-15.77, 6.91) (-0.74, 15.11)	0.424 0.073	(*)	
Lamisil Solution Spray vs. Cream:	1 day 7 days	-5.86 2.32		(-15.86, 4.13) (-5.60, 10.25)	0.235 0.547		
Lamisil Solution Dropper vs. Spray:	l day 7 days	1.43		(-10.52, 13.30) (-3.42, 13.14)	0.804 0.234		
1 day vs. 7 days:	Lamisil Solution Dropper Lamisil Solution Spray Lamisil Cream	-9.16 -5.73 2.46		(~20.11, 1.79) (~15.29, 3.83) (~5.99, 10.91)	0.096 0.225 0.550	(*)	

Note :

The p-values correspond to Student's t-test on t1/2 using the pooled estimate of residual variance from the analysis of variance of the six treatment groups. Flags on p-values indicate the following: \*\*\* for p<0.001, \*\* for 0.001<=p<0.01, for 0.01<=p<0.05 and (\*) for 0.05<=p<0.10.</li>

<sup>2)</sup> n/a = Not applicable due to insufficient data.

en the marketed Lamisil soln and the proposed Lamisil gel. Since amisil gel NDA contains its own safety and efficacy data, an assessment of bioequivalence is not required. Even so the sponsor must indicate in the label that the comparability of the dosage forms has not been demonstrated.

As part of the biopharm package the sponsor provided the results of a k trial in which the absorption of drug from Lamisil gel was compared o normal volunters. We need to have some assurance that the way in which it was studied is in general compliance with the proposed label.

Bubject: Topical Antifungal Evaluation Groups (Revised)

Topical Antifungal Evaluation Groups

Intent to Treat - every subject who was dispensed a study
 treatment (active or vehicle).

Modified Intent to Treat - every subject in the ITT group who ADDITIONALLY had a positive dermatophyte mycology.

Safety Subset - every subject in the ITT group who had a post-baseline assessment.

MITT includes both subjects with and without a post-baseline assessment.

Safety Subset includes both subjects with and without a positive dermatophyte mycology.

The post-baseline assessment that defines, in part, the Safety Subset need not be an actual visit to the clinical study site. Correspondence and telephone calls may suffice.

We are interested in whether females handle the test drug differently than males in terms of both efficacy and safety. We use meta analysis procedures to combine the trials. From this, we calculate a 95% CI on the response rates for males and females separately. If these two CI's overlap, i.e., are not statistically differentiable, we conclude there is no evidence that a difference in efficacy exists. One can alternatively calculate a 95% CI on the difference between Response Rates. If this CI includes "0", we conclude there is no evidence of a difference in efficacy. Similarly, we compare AE's and safety data. The same approach applies to age as defined in the August 2, 1994 geriatric CFR.