DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 18-989/S-056

Wyeth Consumer Healthcare
Attention: Filomena Gesik
Associate Director Regulatory Affairs
Madison, New Jersey 07940-0871

Dear Ms. Gesik:

Please refer to your supplemental new drug application dated March 21, 2003, received March 28, 2003, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Advil (200 mg ibuprofen) Tablets.

This supplemental new drug application provides for a new packaging site as well as new packaging for Advil 200 mg tablets in a 10 count vial with a screw cap.

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

The final printed labeling (FPL) must be identical to the enclosed labeling (immediate container and carton labels), and must be formatted in accordance with the requirements of 21 CFR 201.66.

We have the following additional recommendations for your consideration to be incorporated at the next printing:

1. Under "Directions," the second bullet reads: "adults and children 12 years and over: take 1 tablet every 4 to 6 hours while symptoms persist." The phrase "take 1 tablet every 4 to 6 hours while symptoms persist" should be preceded with a bullet, moved to the next line, and indented. Each subsequent bullet under "Directions," except the last (which pertains to a different age group), should also be indented under "adults and children 12 years and over." The last bullet, "children under 12 years: ask a doctor" should be aligned with the first two bullets. The Directions should appear as follows:

   Directions
   ■ **do not use more than directed**
   ■ adults and children 12 years and over:
   ■ take one tablet every 4 to 6 hours while symptoms persist
   ■ if pain or fever does not respond to 1 tablet, 2 tablets may be used

- do not exceed 6 tablets in 24 hours, unless directed by a doctor
- the smallest effective dose should be used

■ children under 12 years: ask a doctor

The changes should be made for 4.5 and 5.8 inch cards for consistency and to help differentiate the Directions between the two age groups, even if the 4.5 inch card uses a modified Drug Facts format.

2. Increase the size of the statement of identity on the 4.5 and 5.8 inch cards to ½ the size of the Trade name on the PDP.

3. In the Drug Facts labeling on the 4.5 and 5.8 inch cards and on the immediate container, include an 800 phone number under the heading "Questions?" or "Questions or comments?", along with the days of week and times of day a person is available to respond to questions.

4. Revise the Drug Facts labeling on the 4.5 inch card from the modified format to the regular Drug Facts format to allow for easier reading. Labeling space could be increased by using a portion of the front panel for Drug Facts labeling, if needed.

5. On the immediate container (vial), under "Directions", revise the format as described in number 1 above for the labeling on the cards.

6. On the immediate container (vial), increase the font size of the text to allow for easier reading.

7. On the immediate container (vial), consider ways to include all the Drug Facts labeling in the event that consumers would not keep the cards containing complete Drug Facts labeling.

The Agency is concerned about the need for organ-specific warnings for OTC drug products containing analgesic/antipyretic active ingredients. We will provide guidance on wording and placement of organ-specific warnings in the labeling of drug products containing acetaminophen and/or NSAID's in the future.

If you issue a letter communicating important information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH, HFD-410
FDA
5600 Fishers Lane
Rockville, MD 20857

If you have any questions, call Walter J. Ellenberg, Ph.D., Regulatory Project Manager, at (301) 827-2241.

Sincerely,

{See appended electronic signature page}

Curtis Rosebraugh, M.D., M.P.H.
Deputy Director
Division of Over-the-Counter Drug 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/

Curtis Rosebraugh
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