



NDA 21-085/S-027 and S-029
NDA 21-277/S-024 and S-025

Bayer Pharmaceuticals Corporation
Attention: Janet A. Herrington, Ph.D.
Deputy Director, Regulatory Affairs
400 Morgan Lane
West Haven, CT 06516-4175

Dear Dr. Herrington:

Please refer to your New Drug Applications (NDAs) for Avelox® Tablets and Avelox® I.V.

A. Approval of Efficacy Supplements

Please also refer to your supplemental new drug applications submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for the following:

NDA #	Drug Product	Supplement Number	Date of supplement	Date of receipt
21-085	Avelox® (moxifloxacin hydrochloride) Tablets, 400 mg	S-027	January 31, 2005	February 1, 2005
21-277	Avelox® (moxifloxacin hydrochloride in NaCl injection) I.V., 400 mg	S-024	January 31, 2005	January 31, 2005

We acknowledge receipt of your submissions dated:

February 4, 2005	June 6, 2005	August 18, 2005
March 3, 2005	June 30, 2005	September 19, 2005
April 20, 2005	July 22, 2005	November 17, 2005
April 26, 2005	August 11, 2005	
May 12, 2005	August 15, 2005	

These supplemental new drug applications provide for a change in the product labeling to include the use of Avelox® (moxifloxacin hydrochloride) Tablets and Avelox® (moxifloxacin hydrochloride in NaCl injection) I.V. for the treatment of complicated intra-abdominal infections caused by *Escherichia coli*, *Bacteroides fragilis*, *Streptococcus anginosus*, *Streptococcus constellatus*, *Enterococcus faecalis*, *Proteus mirabilis*, *Clostridium perfringens*, *Bacteroides thetaiotaomicron*, or *Peptostreptococcus* species.

We completed our review of these applications, as amended. These applications are approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text.

B. Approval of Labeling Supplements

Please also refer to your supplemental new drug applications submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for the following:

NDA #	Drug Product	Supplement Number	Date of supplement	Date of receipt
21-085	Avelox® (moxifloxacin hydrochloride) Tablets, 400 mg	S-029	April 19, 2005	April 20, 2005
21-277	Avelox® (moxifloxacin hydrochloride in NaCl injection) I.V., 400 mg	S-025	April 19, 2005	April 21, 2005

We acknowledge receipt of your submissions dated November 4 and 9, 2005.

These supplemental new drug applications provide for the following changes to the product labeling:

- Revision to the serum protein binding statement under the **CLINICAL PHARMACOLOGY** section, and
- Revisions to the photosensitivity precautions under the **PRECAUTIONS/Information for Patients** subsection.

We completed our review of these applications, as amended. These applications are approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text.

C. Additional Labeling Revisions

Please refer to your June 30, 2005 submissions to NDA 21-085 and NDA 21-277 containing all available *in vitro* and associated clinical outcome data for Avelox® and staphylococci. These data were submitted in response to a March 2005 request from the Agency in order to determine whether the data either support breakpoints in the current approved product labeling or support changing the interpretive criteria and breakpoints to those published in January 2005 by the Clinical and Laboratory Standards Institute (CLSI), formerly the National Committee for Clinical Laboratory Standards (NCCLS).

Based on the information included in the June 30, 2005 submission, you proposed not to revise the breakpoints as published by the CLSI. The Agency concurs and does not believe that a revision to the breakpoints is necessary.

For accuracy and to ensure that susceptibility interpretive criteria are used only for approved organisms, agreed upon revisions have been made to the **CLINICAL PHARMACOLOGY/MICROBIOLOGY/Susceptibility Testing** subsection and to the **INDICATIONS AND USAGE** section of the labeling to furnish adequate information for the safe and effective use of the drugs.

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert, text for the patient package insert).

The electronic labeling rule published December 11, 2003, (68 FR 69009) requires submission of labeling content in electronic format effective June 8, 2004. For additional information, consult the following guidances for industry regarding electronic submissions: *Providing Regulatory Submissions in Electronic Format - NDAs* (January 1999) and *Providing Regulatory Submissions in Electronic Format – Content of Labeling* (February 2004). The guidances specify that labeling is to be submitted in PDF format. To assist in our review, we request that labeling also be submitted in MS Word format. If formatted copies of all labeling pieces (i.e., package insert, patient package insert, container labels, and carton labels) are submitted electronically, labeling does not need to be submitted in paper. For administrative purposes, these submissions should be designated "**FPL for approved supplement NDA 21-085/S-027 and S-029 and NDA 21-277/S-024 and S-025.**" Approval of these submissions by FDA is not required before the labeling is used.

All applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred. The Agency has not made a determination if a health benefit would be gained by studying AVELOX® (moxifloxacin hydrochloride) in pediatric patients for its approved indications. The agency held an internal meeting in June 2005 to discuss this matter and will inform you on or before October 10, 2006 whether pediatric studies are required under PREA. If FDA determines at that time that pediatric studies are necessary, we will also set a specified time at which you must submit the required assessments, which will be considered to be required post-marketing commitments. The status of any Post-marketing study(ies) required under PREA shall be reported annually according to 21 CFR 314.81.

In addition, submit three copies of the introductory promotional materials that you propose to use for these products. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this Division and two copies of both the promotional materials and the package inserts directly to:

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

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
Food and Drug Administration
5901-B Ammendale Road
Beltsville, MD 20705-1266

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

NDA 21-085/S-027 and S-029

NDA 21-277/S-024 and S-025

Page 4

If you have any questions, please call Kristen Miller, Pharm.D., Regulatory Health Project Manager, at (301) 796-1600.

Sincerely,

{See appended electronic signature page}

Renata Albrecht, M.D.
Director
Division of Special Pathogen and Transplant
Products
Center for Drug Evaluation and Research

Enclosure

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

/s/

Renata Albrecht
11/22/2005 12:09:52 PM