DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-205/S-011

GlaxoSmithKline
Attention: Martha Anne A. Moore, R.Ph.
Antiviral/Antibacterial US Regulatory Affairs
PO Box 13398
Five Moore Drive
Research Triangle Park, NC 27709

Dear Ms. Moore:

Please refer to your supplemental new drug application dated July 14, 2004, received July 16, 2004, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for TRIZIVIR® (abacavir sulfate, lamivudine, and zidovudine) Tablets.

We also acknowledge receipt of your submissions dated: 14-Jul. 2004, 23-Sep. 2004 (2), 19-Oct. 2004, 03-Feb. 2005, 03-Mar. 2005, 04-Mar. 2005, 30-Mar. 2005, 19-Apr. 2005, 28-Apr. 2005 and 04-May 2005.

This supplemental application fulfills your accelerated approval commitments as required under CFR 314.510. Specifically, this supplemental new drug application provides for the use of TRIZIVIR® (abacavir sulfate, lamivudine, and zidovudine) Tablets in combination with other antiretroviral agents or alone for the treatment of HIV-1 infection.

We have completed the review of this application, as amended, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as recommended in the agreed upon labeling text. Accordingly, this application is approved effective on the date of this letter.

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert, text for the medication guide). Marketing the products with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

Please submit the FPL electronically according to the guidance for industry titled *"Providing Regulatory Submissions in Electronic Format – NDA."* Alternatively, you may submit 20 paper copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, this submission should be designated "FPL for approved supplement NDA 21-205/S-011." Approval of this submission by FDA is not required before the labeling is used.

We remind you of your postmarketing study commitments in your submission dated April 19, 2005. These commitments are listed below; please address each as stated.

1. Complete and report on the ongoing pharmacogenetics assessments to identify genetic markers associated with hypersensitivity to abacavir that may have predictive value alone or in combination with HLA-B*5701 (studies CNA30027 and CNA30032) in Caucasians, Blacks, Hispanics, males and females.

    - Final report submission: by May 31, 2006

2. Supplement the previously completed work to identify genetic markers associated with hypersensitivity to abacavir in additional patient subpopulations (studies CNA30027, CNA30032 and EPV40001).

    - Final report submission: by May 31, 2006

3. Prepare and submit a summary of GlaxoSmithKline's cumulative research on possible genetic correlates of hypersensitivity to abacavir.

    - Final report submission: by May 31, 2006

4. Provide data on the genotypes and phenotypes of baseline and on-therapy isolates from patients receiving Trizivir therapy in the absence of other antiretroviral drugs. Data from study CNA3005 (96 week) will be provided in a virology report with data in the HIV resistance template format.

    - Submission of final 96 week study report and data in the HIV resistance template: by August 31, 2005

Submit clinical protocols to your IND for this product. If an IND is not required to meet your Phase 4 commitments, please submit protocols, data and final reports to this NDA as correspondence. Submit nonclinical and chemistry, manufacturing, and controls protocols and all study final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii), you should include a status summary of each commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies, number of patients entered into each study. All submissions, including supplements, relating to these postmarketing study commitments must be prominently labeled "**Postmarketing Study Protocol**", "**Postmarketing Study Final Report**", or "**Postmarketing Study Correspondence**."

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

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, please contact Tanima Sinha, M.S., Regulatory Project Manager, at (301) 827-2335.

Sincerely yours,

{See appended electronic signature page}

Debra Birnkrant, M.D.
Director
Division of Antiviral Drug Products
Office of Drug Evaluation IV
Center for Drug Evaluation and Research

Attachment: Approved labeling

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

/s/

Debra Birnkrant
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NDA 21-205