DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-035/S-038
NDA 21-505/S-006

UCB, Inc.
Attention: Linda F. Noa, M.S., RAC
Senior Associate, Global Regulatory Affairs
1950 Lake Park Drive, Building 2100
Smyrna, GA 30080

Dear Ms. Noa:

Please refer to your supplemental new drug application dated August 31, 2004, received September 2, 2004, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Keppra (levetiracetam) tablets and oral solution.

These supplemental new drug applications provide for revisions to the **Mechanism of Action**, **Pharmacokinetics**, and **Drug Interaction** sections.

We have 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.

The final printed labeling (FPL) must be identical to the submitted labeling (package insert dated June 29, 2005), but must include the following two revisions (in red) as agreed in our January 20, 2006 telephone conversation with you:

1.
CLINICAL PHARMACOLOGY
Mechanism Of Action
The precise mechanism(s) by which levetiracetam exerts its antiepileptic effect is unknown.

2.
Pharmacokinetics
Overview
…Levetiracetam is not significantly protein-bound (<10% bound) and its volume of distribution is close to the volume of intracellular and extracellular water...

Please submit an electronic version of the FPL 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 but no more than 30 days after it is printed. Individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, designate this submission "**FPL for approved supplement NDA 21-035/S-038 and NDA 21-505/S-006**." Approval of this submission by FDA is not required before the labeling is used.

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
WO 22, Room 4447
10903 New Hampshire Avenue
Silver Spring, MD 20993-0002

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, call Courtney Calder, Pharm.D., Regulatory Project Manager, at (301) 796-1050.

Sincerely,

{See appended electronic signature page}

Russell Katz, MD
Director
Division of Neurology Products
Office of Drug Evaluation I
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/

Russell Katz

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