Dear Ms. Benson:


We acknowledge receipt of your submissions dated July 5 and August 23, 2007. We also acknowledge receipt of your electronic submission dated August 30, 2007.

These “Changes Being Effected” supplemental new drug applications provide for the addition of a boxed warning that describes the increased risk for NSF associated with GBCAs in patients with acute or chronic severe renal insufficiency or acute renal insufficiency of any severity due to the hepato-renal syndrome or in the perioperative liver transplantation period and a Warning subsection that contains additional information about the risk of NSF associated with GBCAs and a recommendation to screen patients for renal dysfunction prior to administering GBCAs.

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 final printed labeling (FPL) submitted on June 21, 2007.

We remind you of your postmarketing study commitment in your submissions dated June 21, 2007.

1. To conduct a post-marketing study to collect clinical data sufficient to assess the magnitude of risk for the development of NSF with your product among patients with moderate (GFR<60ml/min/1.73m2) to severe renal insufficiency.

   Final Protocol available: September 28, 2007
   First patient in (start of study accrual): January 31, 2008
   Last patient out (i.e., 2 year follow-up completed on all patients enrolled): August 15, 2012
   Data Analysis: October 31, 2012
   Completion of study report for FDA submission: December 21, 2012
Submit clinical protocols to your IND for this product. 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 Commitment Protocol”, “Postmarketing Study Commitment Final Report”, or “Postmarketing Study Commitment Correspondence.”

In addition, the Division of Drug Marketing, Advertising, and Communications (DDMAC) have reviewed the revised product labeling and have determined that it contains significant new risk information relating to your drug product. We are hereby requesting that all promotional materials for your drug product that include representations about your drug product be revised to include the new risk information immediately. These revisions should include prominent disclosure of the important new information described in the BOXED WARNING and WARNINGS sections that appear in the revised package labeling. Please submit a written response to this request within 14 days, following receipt of this letter, stating whether you intend to comply with this request to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
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
5515 Security Lane
HFD-001, Suite 5100
Rockville, MD 20852

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 James Moore, Regulatory Project Manager, at (301) 796-2050.

Sincerely,

(See appended electronic signature page)

Rafel Dwaine Rieves, M.D.
Acting Director
Division of Medical Imaging and Hematology Products
Office of Oncology 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/

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Rafel Rieves