



NDA 21-788

**NDA APPROVAL**

Duramed Research, Inc  
Attention: Charlene Bruno  
Senior Manager, Regulatory Affairs  
One Belmont Avenue, 11<sup>th</sup> Floor  
Bala Cynwyd, PA 19004

Dear Ms. Bruno:

Please refer to your new drug application (NDA) dated June 25, 2004, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for synthetic conjugated estrogens, A vaginal cream, 0.625 mg/g.

We acknowledge receipt of your submissions dated September 26, October 27, and 28, November 18, 19, 24, 25 and 26 (3), 2008.

Your submission of September 26, 2008, received September 29, 2008 constituted a complete response to our September 12, 2008, action letter.

This new drug application provides for the use of synthetic conjugated estrogens, A vaginal cream for (1) treatment of moderate to severe vaginal dryness, a symptom of vulvar and vaginal atrophy, due to menopause and (2) treatment of moderate to severe dyspareunia, a symptom of vulvar and vaginal atrophy, due to menopause.

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

The final printed labeling (FPL) must be identical to the enclosed labeling submitted November 25, 2008, and to the immediate container and carton labels submitted on November 26, 2008.

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

As soon as possible, but no later than 14 days from the date of this letter, please submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format as described at <http://www.fda.gov/oc/datacouncil/spl.html> that is identical to the agreed-upon labeling. Upon receipt, we will transmit that version to the National Library of Medicine for public dissemination. For administrative purposes, please designate this submission, "SPL for approved NDA 21-788."

**PEDIATRIC RESEARCH EQUITY ACT (PREA)**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for the treatment of (1) treatment of moderate to severe vaginal dryness, a symptom of vulvar and vaginal atrophy, due to menopause and (2) treatment of moderate to severe dyspareunia, a symptom of vulvar and vaginal atrophy, due to menopause, because studies are impossible given the lack of pediatric patients with these conditions.

**POSTMARKETING COMMITMENT**

We remind you of your postmarketing study commitment in your submission dated November 26, 2008. This commitment is listed below.

1. Duramed commits to design and conduct a Phase IV randomized and placebo-controlled clinical trial to find the lowest effective dose of synthetic conjugated estrogens, A vaginal cream for the indications of (1) treatment of moderate to severe vaginal dryness, a symptom of vulvar and vaginal atrophy, due to menopause and (2) treatment of moderate to severe dyspareunia, a symptom of vulvar and vaginal atrophy, due to menopause. In addition, in your submission dated September 26, 2008 you committed to the following time lines for this study:

Protocol Submission:                Within 6 months of the date of the receipt of this letter.

Study Start:                            Within 6 months of protocol agreement

Final Report Submission:        Within 6 months of study completion.

Submit the clinical protocol to your IND for this product. Submit the study final report 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 this 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 the number of patients entered into the study. All submissions, including supplements, relating to this postmarketing study commitment should be prominently labeled “**Postmarketing Study Commitment Protocol**”, “**Postmarketing Study Commitment Final Report**”, or “**Postmarketing Study Commitment Correspondence.**”

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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 George Lyght, R.Ph., Sr. Regulatory Project Manager, at (301) 796-0948.

Sincerely,

*{See appended electronic signature page}*

George Benson, M.D.  
Deputy Director  
Division of Reproductive and Urologic Products  
Office of Drug Evaluation III  
Center for Drug Evaluation and Research

Enclosure

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**This is a representation of an electronic record that was signed electronically and  
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/s/

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George Benson

11/28/2008 10:10:29 AM