Dear Ms. Kirzecky:

Please refer to your Changes Being Effected and Prior Approval supplemental new drug applications submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for VIRACEPT®.

The following Changes Being Effected supplemental new drug applications were dated and received on December 9, 2009:

- **Name of Drug Product:** VIRACEPT® (nelfinavir mesylate) ORAL POWDER  
  NDA Number: 020778  
  Supplement Number: 033

- **Name of Drug Product:** VIRACEPT® (nelfinavir mesylate) TABLETS, 250 mg  
  NDA Number: 020779  
  Supplement Number: 054

- **Name of Drug Product:** VIRACEPT® (nelfinavir mesylate) TABLETS, 625 mg  
  NDA Number: 021503  
  Supplement Number: 015

We also acknowledge receipt of your submissions dated April 16, 2010.

These Changes Being Effected supplemental new drug applications update the “Medicines that require dose adjustments” subsection in the patient package insert (PPI). The revised list of cholesterol-reducing medicines that have an increased risk of drug interactions if taken with VIRACEPT includes the following medications: Lipitor (atorvastatin), Crestor (rosuvastatin), Pravachol (pravastatin) and Lescol (fluvastatin).
The following Prior Approval supplemental new drug applications were dated and received on February 11, 2010.

Name of Drug Product: VIRACEPT® (nelfinavir mesylate) ORAL POWDER
NDA Number: 020778
Supplement Number: 034

Name of Drug Product: VIRACEPT® (nelfinavir mesylate) TABLETS, 250 mg
NDA Number: 020779
Supplement Number: 055

Name of Drug Product: VIRACEPT® (nelfinavir mesylate) TABLETS, 625 mg
NDA Number: 021503
Supplement Number: 016

We also acknowledge receipt of your submissions dated March 22, 2010, and April 16, 2010.

For these Prior Approval supplemental new drug applications, reference is also made to our letter dated January 13, 2010, notifying you, under Section 505(o)(4) of the FDCA, of new safety information that we believe should be included in the labeling for VIRACEPT (nelfinavir mesylate) ORAL POWDER and VIRACEPT (nelfinavir mesylate) TABLETS. This information pertains to the risk of drug-drug interactions with the use of protease inhibitors, including VIRACEPT (nelfinavir mesylate).

These Prior Approval new drug supplemental applications provide for revisions to the labeling regarding coadministration of certain drugs with VIRACEPT (nelfinavir mesylate) ORAL POWDER and VIRACEPT (nelfinavir mesylate) TABLETS.

The following changes are consistent with our January 13, 2010 Safety Labeling Change Notification letter: the CONTRAINDICATIONS and PRECAUTIONS- Drug Interactions sections of the labeling have been updated with the following information.

- The addition of sildenafil as a contraindicated medication when prescribed for the treatment of pulmonary arterial hypertension.
- The addition of alfuzosin as a contraindicated medication.
- The addition of the recommendation that salmeterol should not be coadministered.
- The addition of new dosing recommendations for bosentan and tadalafil when prescribed for the treatment of pulmonary arterial hypertension.
- The addition of new dosing recommendations for colchicine when prescribed for the treatment of familial Mediterranean fever or gout.
- Modification of the dosing recommendation with vardenafil for the treatment of erectile dysfunction.
Agreed upon changes are as follow:

- The addition of new dosing recommendations for colchicine when prescribed for the prophylaxis of gout.
- The addition of the recommendation that colchicine should not be coadministered with VIRACEPT (nelfinavir mesylate) in patients with hepatic or renal impairment.

We have completed our review of these Changes Being Effected and Prior Approval supplemental applications, as amended. These applications are approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text.

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at [http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm](http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm), that is identical to the enclosed labeling and include the labeling changes proposed in any pending “Changes Being Effected” (CBE) supplements. Information on submitting SPL files using eLIST may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at [http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf](http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf).

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications for this NDA, including pending “Changes Being Effected” (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format that includes the changes approved in this supplemental application.

We request that the revised labeling approved today be available on your website within 10 days of receipt of this letter.

**PROMOTIONAL MATERIALS**

For the Prior Approval supplemental new drug applications, all promotional materials for your drug products that include representations about your drug products must be promptly revised to make it consistent with the labeling changes approved in these supplements, including any new safety information [21 CFR 314.70(a)(4)]. The revisions to your promotional materials should include prominent disclosure of the important new safety information that appears in the revised package labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the following address or by facsimile at 301-847-8444:
In addition, as required under 21 CFR 314.81(b)(3)(i), you must submit your updated final promotional materials, and the package insert(s), at the time of initial dissemination or publication, accompanied by a Form FDA-2253, directly to the above address. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

LETTERS TO HEALTH CARE PROFESSIONALS

If you issue a letter communicating important safety related information about these drug products (i.e., a “Dear Health Care Professional” letter), we request that you submit an electronic copy of the letter to both these NDAs and to the following address:

MedWatch
Food and Drug Administration
5600 Fishers Lane, Room 12B05
Rockville, MD 20857

REPORTING REQUIREMENTS

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 Amalia Himaya, Regulatory Project Manager, at (301) 796-3391 or the Division’s main number at (301) 796-1500.

Sincerely,

{See appended electronic signature page}

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

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

/s/

KENDALL A MARCUS
04/26/2010