Dear Mr. Bergan:

Please refer to your Supplemental Biologics License Applications (sBLAs), dated December 19, 2008, submitted under section 351 of the Public Health Service Act for Prolia® (denosumab).

We acknowledge receipt of your amendments dated through September 15, 2011 and your risk evaluation and mitigation strategy (REMS) assessment dated September 9, 2011.

The March 18, 2011, submissions constituted complete responses to our October 19, 2009, action letter for each of the supplements listed below:

**BLA STN 125320/5**
This Prior Approval efficacy supplement to your biologics license application provides for a new indication to include treatment to increase bone mass in women at high risk for fracture receiving adjuvant aromatase inhibitor therapy for breast cancer.

**BLA STN 125320/6**
This Prior Approval efficacy supplement to your biologics license application provides for a new indication to include treatment to increase bone mass in men at high risk for fracture receiving androgen deprivation therapy for nonmetastatic prostate cancer. In these patients Prolia also reduced the incidence of vertebral fractures.

These supplements also provide for a proposed modification to the approved REMS.

We have completed our review of these supplemental applications, as amended. They are approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.
**CONTENT OF LABELING**
As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 601.14(b)] 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 (text for the package insert and Medication Guide) 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). For administrative purposes, please designate this submission “Product Correspondence – Final SPL for approved BLA STNs 125320/5 and 125320/6.”

Also within 14 days, amend all pending supplemental applications for this BLA, including pending “Changes Being Effected” (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] in MS Word format that includes the changes approved in these supplemental applications.

The SPL will be accessible via publicly available labeling repositories.

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

**REQUIRED PEDIATRIC ASSESSMENTS**
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 these applications because necessary studies are impossible or highly impracticable because the disease/condition does not exist in children.

**RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS**
The REMS for Prolia® (denosumab) was originally approved on June 1, 2010, and a REMS modification was approved July 22, 2011. The REMS consists of a Medication Guide, communication plan, and a timetable for submission of assessments of the REMS. Your proposed modifications to the REMS consist of a revised REMS document to describe the amended communication plan, updated communication materials reflecting the newly approved indications, and an updated Medication Guide to be consistent with the prescribing information.

Your proposed modified REMS, submitted on July 1, 2011, and appended to this letter, is approved.
The timetable for submission of assessments of the REMS will remain the same as that approved on June 1, 2010.

There are no changes to the REMS assessment plan described in our June 1, 2010 letter.

We remind you that assessments of an approved REMS must also include, under section 505-1(g)(3)(B) and (C), information on the status of any post-approval study or clinical trial required under section 505(o) or otherwise undertaken to investigate a safety issue. With respect to any such post-approval study, you must include the status of such study, including whether any difficulties completing the study have been encountered. With respect to any such post-approval clinical trial, you must include the status of such clinical trial, including whether enrollment has begun, the number of participants enrolled, the expected completion date, whether any difficulties completing the clinical trial have been encountered, and registration information with respect to requirements under subsections (i) and (j) of section 402 of the Public Health Service Act. You can satisfy these requirements in your REMS assessments by referring to relevant information included in the most recent annual report required under section 506B and 21 CFR 601.70 and including any material or significant updates to the status information since the annual report was prepared. Failure to comply with the REMS assessments provisions in section 505-1(g) could result in enforcement action.

In addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of FDCA.

Prominently identify the submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

**BLA 125320 REMS ASSESSMENT**

**NEW SUPPLEMENT FOR BLA 125320**
**PROPOSED REMS MODIFICATION**
**REMS ASSESSMENT**

**NEW SUPPLEMENT (NEW INDICATION FOR USE)**
**FOR BLA 125320**
**REMS ASSESSMENT**
**PROPOSED REMS MODIFICATION (if included)**

If you do not submit electronically, please send 5 copies of REMS-related submissions.

**PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the
proposed materials in draft or mock-up form with annotated references, and the package insert(s) 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

As required under 21 CFR 601.12(f)(4), you must submit final promotional materials, and the package insert(s), at the time of initial dissemination or publication, accompanied by a Form FDA 2253. 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.

All promotional materials for your drug product that include representations about your drug product must be promptly revised to make it consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 601.12(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 601.12(a)(4) to the address above or by fax to 301-847-8444.

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, call Melanie Pierce, Senior Regulatory Health Project Manager, at (301) 796-1273.

Sincerely,

/ Patricia Keegan /
Patricia Keegan, M.D.
Director
Division of Oncology Products 2
Office of Hematology Oncology Drug Products
Center for Drug Evaluation and Research

ENCLOSURES:
Content of Labeling
REMS