Dear Ms. McKay:

Please refer to your New Drug Application (NDA) dated November 30, 2011, received November 30, 2011, submitted under section 505(b)(1) of the Federal Food, Drug, and Cosmetic Act, for Revatio (sildenafil) 20 mg tablets.

This “Prior Approval” supplemental new drug application provides for several labeling changes. Because you intend to market all Revatio (sildenafil) dosage forms using one common package insert, the labeling changes made to this sNDA are identical to those agreed-upon for NDA 203109 (Revatio for Oral Suspension) and sNDA 22473/S-003 (Revatio Injection).

We have completed our review of this supplemental application. It is 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 the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at [http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm](http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm). Content of labeling must be identical to the enclosed labeling (text for the package insert, text for the patient package insert, Medication Guide), with the addition of any labeling changes in pending “Changes Being Effected” (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.


The SPL will be accessible from publicly available labeling repositories.
Also within 14 days, amend all pending supplemental applications for this NDA, including 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, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

**POSTMARKETING REQUIREMENTS UNDER 505(o)**

Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

Since Revatio (sildenafil) was approved on June 3, 2005, we have become aware of a study in pediatric patients that shows patients taking a high dose of Revatio (sildenafil) had a higher risk of death compared to those taking a lower dose (dose-related effect on mortality). We consider this information to be “new safety information” as defined in section 505-1(b)(3) of the FDCA.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to assess a signal of a serious risk of Revatio’s dose-related effect on mortality in adults.

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess this serious risk.

Finally, we have determined that only a clinical trial (rather than a nonclinical or observational study) will be sufficient to assess this signal of a serious risk of dose-related effect on mortality in adults.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct one or more postmarketing clinical trials to investigate the effects on mortality of multiple doses of sildenafil in adults with pulmonary arterial hypertension (World Health Organization (WHO) Group 1).

Submit a proposal to address this requirement to your IND 64924, with a cross-reference letter to this NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission “Required Postmarketing Correspondence Under 505(o)”.

We will continue discussion of your postmarketing clinical trial proposal, including the methodology and feasibility of the proposed trial, and possibly the addition of other trials.
PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) to:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion (OPDP)
5901-B Ammendale Road
Beltsville, MD 20705-1266

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at [http://www.fda.gov/opacom/morechoices/fdaforms/cder.html](http://www.fda.gov/opacom/morechoices/fdaforms/cder.html); instructions are provided on page 2 of the form. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see [http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm](http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm).

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in 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 address above or by fax to 301-847-8444.

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 call Dan Brum, Pharm.D., RAC, Regulatory Project Manager, at (301)796-0578.

Sincerely,

{See appended electronic signature page}

Ellis Unger, M.D.
Director
Office of Drug Evaluation I
Center for Drug Evaluation and Research

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

/s/

ELLIS F UNGER
08/30/2012