

**CENTER FOR DRUG EVALUATION AND  
RESEARCH**

*APPLICATION NUMBER:*  
**022501Orig1s000**

**OTHER ACTION LETTERS**



NDA 022501

**COMPLETE RESPONSE**

Warner Chilcott Company, LLC  
Attention: Ileana Brown  
Director, Regulatory Affairs  
100 Enterprise Drive  
Rockaway, NJ 07866

Dear Ms. Brown:

Please refer to your new drug application (NDA) dated and received March 26, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for norethindrone acetate and ethinyl estradiol tablets/ethinyl estradiol tablets/ferrous fumarate tablets.

We acknowledge receipt of your amendments dated April 9 and 22, July 22 and 23, September 1 and 21, October 16 and 20, November 10, 11, 20, and 30, December 3, 17, and 23, 2009, and January 19, 20, and 21, 2010.

We have completed the review of your application, as amended, and have determined that we cannot approve this application in its present form. We have described below our reasons for this action and, where possible, our recommendations to address these issues.

### **PRODUCT QUALITY**

During inspections of a drug substance manufacturing facility and a control testing laboratory used to support this application, our field investigators conveyed deficiencies to the representatives of the respective facilities. These deficiencies have not been resolved. Satisfactory resolution of these deficiencies is required before this application can be approved.

### **LABELING**

Labeling remains unresolved. We will continue labeling discussions based on your submission of January 21, 2010.

### **SAFETY UPDATE**

When you respond to the above deficiencies, include a safety update as described at 21 CFR 314.50(d)(5)(vi)(b). The safety update should include data from all nonclinical and clinical studies/trials of the drug under consideration regardless of indication, dosage form, or dose level.

1. Describe in detail any significant changes or findings in the safety profile.
2. When assembling the sections describing discontinuations due to adverse events, serious adverse events, and common adverse events, incorporate new safety data as follows:
  - Present new safety data from the studies/clinical trials for the proposed indication using the same format as the original NDA submission.
  - Present tabulations of the new safety data combined with the original NDA data.
  - Include tables that compare frequencies of adverse events in the original NDA with the retabulated frequencies described in the bullet above.
  - For indications other than the proposed indication, provide separate tables for the frequencies of adverse events occurring in clinical trials.
3. Present a retabulation of the reasons for premature trial discontinuation by incorporating the drop-outs from the newly completed trials. Describe any new trends or patterns identified.
4. Provide case report forms and narrative summaries for each patient who died during a clinical trial or who did not complete a trial because of an adverse event. In addition, provide narrative summaries for serious adverse events.
5. Describe any information that suggests a substantial change in the incidence of common, but less serious, adverse events between the new data and the original NDA data.
6. Provide updated exposure information for the clinical studies/trials (e.g., number of subjects, person time).
7. Provide a summary of worldwide experience on the safety of this drug. Include an updated estimate of use for drug marketed in other countries.
8. Provide English translations of current approved foreign labeling not previously submitted.

## **OTHER**

Within one year after the date of this letter, you are required to resubmit or take one of the other actions available under 21 CFR 314.110. If you do not take one of these actions, we will consider your lack of response a request to withdraw the application under 21 CFR 314.65. A resubmission must fully address all the deficiencies listed. A partial response to this letter will not be processed as a resubmission and will not start a new review cycle.

Under 21 CFR 314.102(d), you may request a meeting or telephone conference with us to discuss what steps you need to take before the application may be approved. If you wish to have such a meeting, submit your meeting request as described in the FDA's *Guidance for Industry - Formal Meetings Between the FDA and Sponsors or Applicants*, May 2009 at

<http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM153222.pdf>.

The drug product may not be legally marketed until you have been notified in writing that this application is approved.

If you have any questions, call Karl Stiller, Regulatory Project Manager, at (301) 796-1993.

Sincerely,

*{See appended electronic signature page}*

Scott Monroe, M.D.  
Director  
Division of Reproductive and Urologic Products  
Office of Drug Evaluation III  
Center for Drug Evaluation and Research

Application  
Type/Number

Submission  
Type/Number

Submitter Name

Product Name

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NDA-22501

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ORIG-1

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WARNER  
CHILCOTT CO INC

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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.**  
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/s/  
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SCOTT E MONROE  
01/26/2010