CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

20-560/S020

Trade Name: Fosamax

Generic Name: (alendronate sodium)

Sponsor: Merck Research Laboratories

Approval Date: October 19, 1999
**Applications for Approval**

**Application Number:** 20-560/S020

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Dear Dr. Flicker:

Please refer to your supplemental new drug application dated October 30, 1998, received November 2, 1998 (Supplement 016) and your supplemental new drug application dated April 26, 1999, received April 27, 1999 (Supplement 020), submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Fosamax (alendronate sodium) 10 and 40 mg Tablets.

We acknowledge receipt of your submission dated June 22, 1999 (Supplement 016). Your submission of April 22, 1999, constituted a complete response to our March 2, 1999, action letter for Supplement 016. We also acknowledge receipt of your submissions dated June 22, 1999 (Supplement-016), and May 26, June 8, and August 17, 1999 (Supplement-020). Further, we refer to the October 6, 1999, telephone conversation between you and Mr. Randy Hedin of our Division in which you agreed to the change listed below concerning bullet three on page two of the physicians’ sample blister package.

Supplement 016 proposes the following changes: A new physicians’ sample blister package for the 10 mg strength of Fosamax Tablets, associated labeling for the new blister package, and two new —— packaging sites for these physicians samples. The submission also requests a categorical exclusion from the requirement to prepare an environmental assessment for the tablets in these blister packages. Supplement 020 provides for a wax polish and a shape change.

We have completed the review of these supplemental applications, as amended, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as recommended in the agreed upon labeling text with the minor revision listed below. Accordingly, these supplemental applications are approved effective on the date of this letter.

The third bullet on page two of the carton in supplement 016 should be changed from, “—FOSAMAX increased the amount of spinal bone in more than 9 out of 10 patients with osteoporosis.—” to “FOSAMAX increased the amount of spinal bone in more than 9 out of 10 patients with osteoporosis.”
The new labeling for the physicians' sample blister package must be identical, and include the minor revision indicated, to the submitted draft blister package submitted on April 22, 1999. This revision is a term of the approval.

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, contact Randy Hedin, R.Ph., Senior Regulatory Management Officer, at (301) 827-6392.

Sincerely,

[Signature]
Sólonon Sobo, M.D.
Director
Division of Metabolic and Endocrine Drug Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

cc:
Archival NDA 20569/
HFD-510/Div. Files
HFD-510/R.Hedin
HFD-510/Reviewers and Team Leaders
HFD-095/DDMS-IMT
HFD-820/DNDC Division Director
DISTRICT OFFICE

Drafted by: RH/October 7, 1999
Initialed by: ECheikhale/10.14/SMarkofsky/DWu/10.15/RShore for HAhn/EGalliers/10.18.99
final: RH 10.19.99
filename: N20560AP.L16

APPROVAL (AP)
October 13, 1999

sNDA 20560-020

MEMO TO THE FILE:

I have reviewed the labeling changes proposed by the sponsor in NDA 20560-020. These changes relate to the shape change and wax coating for Fosamax™ 10 mg tablets. The changes in the label and blister package are acceptable. It should be noted that these comments apply only to the changes proposed herein. Extensive labeling changes for Fosamax™ are currently pending, based on other supplemental NDA submissions.

BRUCE S. SCHNEIDER, MD
MEDICAL OFFICER, DMEDP, HFD-510

CC Drs. Sobel, Troendle, Mr. Hedin, HFD-510 file
CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
20-560/S020

CHEMISTRY REVIEW(S)
**CHEMIST'S REVIEW**

1. ORGANIZATION

DMEDP, HFD-510

2. NDA NUMBER

20-560

3. NAME AND ADDRESS OF APPLICANT

Erck & Co., Inc.

Sumneytown Pike P.O. Box 4

BLA-20 West Point, PA 19486

4. SUPPLEMENT NUMBER, DATE

SCS-020, 04/26/99

User Fee date: 08/27/99 (4 months)

10/27/99 (6 months)

5. NAME OF THE DRUG

Fosamax

6. NONPROPRIETARY NAME

Alendronate sodium

7. SUPPLEMENT PROVIDES FOR:

An image change of Fosamax™ 10 mg tablets, including a shape change and addition of wax polish.

8. AMENDMENTS/REPORT, DATE

5/26/99

8/17/99

9. PHARMACOLOGICAL CATEGORY

Treatment and prevention of osteoporosis. Treatment of Paget's disease of bone.

10. HOW DISPENSED

Rx

11. RELATED IND/ND/DMF

12. DOSAGE FORM

Tablet

13. POTENCY

5, 10, 40 mg

14. CHEMICAL NAME AND STRUCTURE.

(4-amino-1-hydroxybutylidene) bisphosphonic acid monosodium salt trihydrate, C₄H₁₂NNaO₇P₂.3H₂O See chemistry review #1.

15. COMMENTS

This supplement is submitted to HFD-510 as a PA. The sponsor is requesting an image change for the 10 mg tablet, from the current round, non coated tablet to an oval, wax coated tablet. The changes were made for marketing purpose only. The first amendment (5/26/99) clarifies that the sponsor wants to use the same packaging facilities as currently approved for the round tablets. It also contains minor corrections in the process description. The second amendment (8/17/99) provides for a response to our request for information: including acceptance/identity tests and criteria for carnauba wax NF and batch records for the stability lot E980720, of the new image tablets. Other supporting information provided includes manufacturing and controls for the new tablet and revised labeling. Due to a change in tablet shape and the addition of wax coating that may affect the dissolution profiles, a biopharm consult was requested. The review is still pending. The Division of Clinical Pharmacology and Biopharmaceutics finds the change acceptable (see attached review).

16. CONCLUSION AND RECOMMENDATION

From a chemistry standpoint, adequate information has been provided. Issue an approval letter. Request a final printed label (FPL).

17. NAME

Elisabeth G. Chikhale, Ph.D.

REVIEWER SIGNATURE

DATE COMPLETED

9/9/99

DISTRIBUTION: ORIGINAL JUNKET

CSO REVIEWER DIVISION FILE

INIT. by: 

CC: HFD-510, NDA 20-560/S-020

HFD-510/ DG Wu / R Hedin / EG Chikhale/Division file/NDA 20-560

1
4 Page(s) Withheld

× § 552(b)(4) Trade Secret / Confidential

§ 552(b)(4) Draft Labeling

§ 552(b)(5) Deliberative Process

Withheld Track Number: Chemistry-20-560 5020
APPLICATION NUMBER:
20-560/S020

CLINICAL PHARMACOLOGY AND
BIOPHARMACEUTICS REVIEW(S)
CLINICAL PHARMACOLOGY AND BIOPHARMACEUTICS REVIEW

NDA 20-560/S-020
Fosamax™
Alendronate Sodium Tablets

Merck & Co., Inc.
West Point, PA

SUBMISSION DATE: 4/26/99

REVIEWER: Hae-Young Ahn, Ph.D.

SUBMISSION TYPE: Supplement for Shape Change

SUBMISSION: The sponsor has submitted a supplemental NDA to propose an image change for Fosamax™ 10 mg tablets from the currently marketed round tablet to an oval tablet, polished with wax. No changes to the currently approved formulation or method of manufacture was proposed, except for the addition of the wax. The process specifications for hardness and thickness will change to accommodate the manufacturing requirements of the new shape.

The sponsor compared dissolution profiles to the proposed tablets to those of the currently marketed tablets using the approved dissolution method and showed that two profiles were superimposable. (Note: The approved dissolution method is USA Method 2 with a paddle speed of 50 rpm in 900 mL water. The specification is Q = at 15 minutes.)

<table>
<thead>
<tr>
<th>Lot # Image</th>
<th>E980720* Oval/Wax</th>
<th>2022087* Round</th>
<th>2022088* Round</th>
<th>2022089* Round</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appearance</td>
<td>Conforms</td>
<td>Conforms</td>
<td>Conforms</td>
<td>Conforms</td>
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<tr>
<td>Dose Uniformity(%)</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td>/</td>
</tr>
<tr>
<td>Dissolution (%)</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td>/</td>
</tr>
<tr>
<td>Assay (%)</td>
<td>99.8</td>
<td>98.5</td>
<td>100.5</td>
<td>101.1</td>
</tr>
<tr>
<td>Identity</td>
<td>Conforms</td>
<td>Conforms</td>
<td>Conforms</td>
<td>Conforms</td>
</tr>
</tbody>
</table>

*Manufactured at the MMD facility at Arecibo, Puerto Rico.
## Comparative Dissolution Profiles

<table>
<thead>
<tr>
<th>Lot # Image</th>
<th>E980720*&lt;sup&gt;a&lt;/sup&gt; Oval/Wax</th>
<th>2022087*&lt;sup&gt;b&lt;/sup&gt; Round</th>
<th>2022088*&lt;sup&gt;b&lt;/sup&gt; Round</th>
<th>2022089*&lt;sup&gt;b&lt;/sup&gt; Round</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time (min)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td><img src="image" alt="Graph" /></td>
<td></td>
<td></td>
</tr>
<tr>
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<tr>
<td>30</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>40</td>
<td><em>not tested</em></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Manufactured at the MMD facility at Arecibo, Puerto Rico.

* Data were generated for 12 tablets.

* Data were generated for 6 tablets at 10, 20, 30, and 40 minutes, and 40 tablets at 15 minutes.

Specification: Conforms to USP; Q = 80% in 15 minutes

Profiles are shown in Figure 3.

**Figure 3:** Comparative Dissolution Profiles for FOSAMAX 10 mg
New Image vs. Current Image

![Graph](image)

The Agency’s SUPAC IR guidance for industry does not cover a shape change. However, a shape change involves minor equipment and process changes. Head of equipment will be different and it can be considered as a level 1 change that does not require any additional dissolutions beyond application/compendial dissolution requirements. Process change such as mixing times and operating speeds, if any, can be considered as a level 1 change and it does not require anything beyond application/compendial dissolution requirements.
RECOMMENDATION:
The Office of Clinical Pharmacology and Biopharmaceutics/Division of Pharmaceutical Evaluation II has reviewed the supplemental NDA 20-560 submitted on 4/26/99 and finds the proposed change acceptable.

Please convey the Recommendation to the sponsor as appropriate.

Hae-Young Ahn, Ph.D.
Division of Pharmaceutical Evaluation II
Office of Clinical Pharmacology and Biopharmaceutics

RD/FT initialed by J. Hunt, Deputy Director 9/7/99

CC: NDA 20-560, HFD-510 (Hedin, Wu), HFD-870 (M. Chen, Ahn), CDR (Murphy)

CODE:AP
CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
20-560/S020

ADMINISTRATIVE and CORRESPONDENCE DOCUMENTS
Mr. Randy Hedin, Senior Regulatory Manager
Division of Metabolism and Endocrine Drug Products
HFD-510, Room 14B-04
Office of Drug Evaluation II (CDER)
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

NDA 20-560/S-020: FOSAMAX™
(Alendronate Sodium Tablets)

Response to Request for Information

Dear Mr. Hedin:

Reference is made to the Supplemental New Drug Application cited above, submitted on April 26, 1999, which provides for an image change for FOSAMAX™ 10 mg tablets that involves a shape change and addition of wax polish, and to an amendment submitted on May 26, 1999 which clarified the packaging facilities for the new 10 mg image and corrected minor errors in the process description. Further reference is made to a July 8, 1999 telephone conversation between Mr. Randy Hedin (FDA) and Dr. Michele Flicker (MRL, a Division of Merck & Co., Inc.) in which Mr. Hedin requested that MRL provide a complete desk copy of the above referenced supplemental application.

With the attachment to this submission, we are providing an additional desk copy of the above referenced supplemental application (attachment A) and amendment (attachment B).

Questions concerning this submission should be addressed to Michele R. Flicker, MD, PhD (610/397-3193) or, in my absence, Larry P. Bell, MD (610/397-2310).

Sincerely,

Michele R. Flicker, MD, PhD
Director, Regulatory Affairs

**Reviews Completed**

q/canal/mk0217/responses/s020res

CSO ACTION:

□ LETTER □ N.A.I. □ MEMO

CSO INITIALS 12/14/99

DATE

Attachments

Federal Express #1

Desk copy (Letter Only): Dr. Solomon Sobel, HFD-510, Room 14B-04
Federal Express #1
May 26, 1999

Solomon Sobel, MD, Director
Division of Metabolism and Endocrine Drug Products
HFD-510, Room 14B-04
Office of Drug Evaluation II
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

NDA 20-560/S-020: FOSAMAX™
(Alendronate Sodium Tablets)

AMENDMENT TO PENDING SUPPLEMENTAL APPLICATION

Dear Dr. Sobel:

Reference is made to the Supplemental New Drug Application cited above, submitted on April 26, 1999, which provides for an image change for FOSAMAX™ 10 mg tablets that involves a shape change and addition of wax polish. With this submission, Merck Research Laboratories (MRL, a Division of Merck & Co., Inc.) is providing an amendment to the above referenced supplemental application for the following purposes:

- Clarify the identity of __________ packaging facilities for the new 10 mg image
- Correct minor errors in the process description

Specifically, Merck & Co., Inc. wishes to retain the __________ packaging facilities of __________ and __________, for the new image. The process description has been corrected regarding the amount of carnauba wax for the entire __________ batch size and the amount of tablets per pan load for the wax polishing step.

Pursuant to 21 CFR 314.70(a), a complete field copy of this supplement has been submitted to the FDA Philadelphia District Office.
As required by Section 306(k)(1) of the Generic Drug Enforcement Act [21 U.S.C. 335a (k)(1)], we hereby certify that, in connection with this application, Merck & Co., Inc. did not and will not use in any capacity the services of any person debarred under subsections 306 (a) or (b) of the Act.

We consider the filing of this Supplemental New Drug Application to be a confidential matter, and request the Food and Drug Administration not make its content, nor any future communications in regard to it, public without first obtaining the written permission of Merck & Co., Inc.

Questions concerning this submission should be addressed to Michele R. Flicker, MD, PhD (610/397-3193) or, in my absence, Larry P. Bell, MD (610/397-2310).

Sincerely,

Michele R. Flicker, MD, PhD
Director, Regulatory Affairs

Attachments

Federal Express #1

Desk copies:
Mr. Randy Hedin, CSO, HFD-510, Room 14B-04 - Federal Express #1
Dr. Shelly Markofsky, HFD-510, Room 14B-04 - Federal Express #1

Ms. Debra Pagano
Philadelphia District Office
Food & Drug Administration
U.S. Custom House Room 900
2nd and Chestnut Streets
Philadelphia, PA 19106-2973
Federal Express #2
Dear Dr. Sobel:

Reference is made to the NDA cited above. Further reference is made to a September 9, 1998 submission which provided a proposal regarding the submission of a supplemental application providing for an image change for FOSAMAX™ 10 mg tablets that involves a shape change and addition of wax polish. Further reference is made to a September 23, 1998 telephone conversation between Dr. Shelly Markofsky (FDA) and Dr. Michelle Kloss (MRL, a Division of Merck & Co., Inc) during which the Agency’s review of this proposal was discussed; during this conversation, Dr. Markofsky indicated that the Agency agreed with MRL’s proposal regarding the submission of a supplemental application providing for this image change.

Pursuant to Section 505(b) of the Food Drug and Cosmetic Act and in accordance with 21 CFR 314.70 (b), we submit a supplement to NDA 20-560. As indicated on the attached Form FDA 356h, this supplemental application provides for changes in the Labeling and Chemistry Sections of the approved New Drug Application for FOSAMAX™. As noted above, this supplemental application provides for the change of the FOSAMAX™ 10 mg image from the currently marketed round tablet to an oval tablet, polished with wax.

In accordance with the Food and Drug Administration Modernization Act of 1997, as indicated in the attached Form 3397, no user fee is required for this supplemental application.

Attached, for the Agency’s review and approval, are the following:

- CMC documentation for the new image tablet
- Draft labeling which incorporates revisions provided for in this application
- Patent information.

Pursuant to 21 CFR 314.70(a), a complete field copy of this supplement has been submitted to the FDA Philadelphia District Office.
Merck is requesting a categorical exclusion from the requirements to prepare an Environmental Assessment under 21 CFR 25.31(a) for this supplemental application.

As required by Section 306(k)(1) of the Generic Drug Enforcement Act [21 U.S.C. 335a (k)(1)], we hereby certify that, in connection with this application, Merck & Co., Inc. did not and will not use in any capacity the services of any person debarred under subsections 306 (a) or (b) of the Act.

We consider the filing of this Supplemental New Drug Application to be a confidential matter, and request the Food and Drug Administration not make its content, nor any future communications in regard to it, public without first obtaining the written permission of Merck & Co., Inc.

Questions concerning this submission should be addressed to Michelle W. Kloss, Ph.D. (610/397-2905) or, in my absence, Larry P. Bell, M.D. (610/397-2310).

Sincerely,

Michelle W. Kloss, Ph.D.
Director
Regulatory Affairs

Attachments

Federal Express #1

Desk copy:
Mr. Randy Hedin, CSO, HFD-510, Room 14B-04 - Federal Express #1
Dr. Shelly Markofsky, HFD-510, Room 14B-04 - Federal Express #1

Ms. Debra Pagano
Philadelphia District Office
Food & Drug Administration
U.S. Custom House Room 900
2nd and Chestnut Street
Philadelphia, Pennsylvania 19106-2973 - Federal Express #2
NDA 20-560/S-020

Merk & Co., Inc.
Sumneytown Pike P.O. Box 4
BLA-20 West Point, PA 19486

Attention: Michelle W Kloss, Ph.D.
Director, Regulatory Affairs

Dear Dr. Kloss:

We acknowledge receipt of your supplemental application for the following:

Name of Drug: Fosamax™ (Alendronate Sodium) Tablets
NDA Number: 20-560
Supplement Number: S-020
Date of Supplement: April 26, 1999
Date of Receipt: April 27, 1999

Unless we find the application not acceptable for filing, this application will be filed under Section 505(b)(1) of the Act on June 26, 1999, in accordance with 21 CFR 314.101(a).

All communications concerning this NDA should be addressed as follows:

Center for Drug Evaluation and Research
Division of Metabolic and Endocrine Drug Products, HFD-510
Office of Drug Evaluation II
Attention: Document Control Room 14B-19
5600 Fishers Lane
Rockville, MD 20857

Sincerely,

[Signature]
Emid Galliers
Chief, Project Management Staff
Division of Metabolic and Endocrine Drug Products, HFD-510
Office of Drug Evaluation II
Center for Drug Evaluation and Research
cc:
   Original NDA 20-560/S-020
   HFD-510/Div. Files
   HFD-510/CSO/D. Hedin

filename:

SUPPLEMENT ACKNOWLEDGEMENT
See Instructions on Reverse Side Before Completing This Form

APPLICANT'S NAME AND ADDRESS

Merck & Co., Inc.
Summeytown Pike, BLA-10
P. O. Box 4
West Point, PA 19486

PRODUCT NAME

FOSAMAX™

DOES THIS APPLICATION REQUIRE CLINICAL DATA FOR APPROVAL?
IF YOUR RESPONSE IS "NO" AND THIS IS FOR A SUPPLEMENT, STOP HERE AND SIGN THIS FORM.

☐ THE REQUIRED CLINICAL DATA ARE CONTAINED IN THE APPLICATION.
☐ THE REQUIRED CLINICAL DATA ARE SUBMITTED BY REFERENCE TO
   (APPLICATION NO. CONTAINING THE DATA).

TELEPHONE NUMBER (Include Area Code)

(610) 397-2383

USER FEE I.D. NUMBER

LICENSE NUMBER / NDA NUMBER

IS THIS APPLICATION COVERED BY ANY OF THE FOLLOWING USER FEE EXCLUSIONS? IF SO, CHECK THE APPLICABLE EXCLUSION.

☐ A LARGE VOLUME PARENTERAL DRUG PRODUCT
   APPROVED UNDER SECTION 505 OF THE FEDERAL
   FOOD, DRUG, AND COSMETIC ACT BEFORE 9/1/92
   (Self Explanatory)

☐ A 505(b)(2) APPLICATION THAT DOES NOT REQUIRE A FEE
   (See Item 7, reverse side before checking box.)

☐ THE APPLICATION QUALIFIES FOR THE ORPHAN
   EXCEPTION UNDER SECTION 736(a)(1)(E) OF THE FEDERAL FOOD,
   DRUG, AND COSMETIC ACT
   (See Item 7, reverse side before checking box.)

☐ THE APPLICATION IS A PEDIATRIC SUPPLEMENT THAT
   QUALIFIES FOR THE EXCEPTION UNDER SECTION 736(a)(1)(F)
   OF THE FEDERAL FOOD, DRUG, AND COSMETIC ACT
   (See Item 7, reverse side before checking box.)

☐ THE APPLICATION IS SUBMITTED BY A STATE OR FEDERAL
   GOVERNMENT ENTITY FOR A DRUG THAT IS NOT DISTRIBUTED
   COMMERCIALY
   (Self Explanatory)

FOR BIOLOGICAL PRODUCTS ONLY

☐ WHOLE BLOOD OR BLOOD COMPONENT FOR
   TRANSFUSION

☐ A CRUDE ALLERGENIC EXTRACT PRODUCT

☐ AN APPLICATION FOR A BIOLOGICAL PRODUCT
   FOR FURTHER MANUFACTURING USE ONLY

☐ AN 'IN VITRO' DIAGNOSTIC BIOLOGICAL PRODUCT
   LICENSED UNDER SECTION 351 OF THE PHS ACT

☐ BOVINE BLOOD PRODUCT FOR TOPICAL
   APPLICATION LICENSED BEFORE 9/1/92

HAS A WAIVER OF AN APPLICATION FEE BEEN GRANTED FOR THIS APPLICATION?

☐ YES ❑ NO
   (See reverse side if answered YES)

A completed form must be signed and accompany each new drug or biologic product application and each new supplement. If payment is sent by U.S. mail or courier, please include a copy of this completed form with payment.

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to:

DHHS, Reports Clearance Officer
Paperwork Reduction Project (0910-0297)
Hubert H. Humphrey Building, Room 531-H
200 Independence Avenue, S.W.
Washington, DC 20201

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Please DO NOT RETURN this form to this address.

SIGNATURE OF AUTHORIZED COMPANY REPRESENTATIVE

Bonnie Goldman

TITLE

Bonnie J. Goldmann, M.D.
Vice President, Domestic Liaison
Regulatory Affairs

DATE

4/26/99

FORM FDA 3397 (5/98)