

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

**RE: DOCKET NO. 2000D-1350**  
Comments to Draft Guidance for  
Industry on Labeling for Combined  
Oral Contraceptives

Dear Sir or Madame:

Reference is made to the draft guidance for industry entitled "Labeling for Combined Oral Contraceptives" Docket No. 2000D-1350. Although we realize that the deadline for submission of comments was May 4, 2004, as per agreement between Ms. Margaret Kober, Center for Drug Evaluation and Research (CDER), and Ms. Toni-Marie Nearing-Crowley, Johnson & Johnson Pharmaceutical Research & Development, L.L.C. (J&JPRD), we are most appreciative that the Agency agreed to consider our comments if submitted by May 12, 2004.

J&JPRD and Ortho-McNeil Pharmaceutical, Inc. (OMP), affiliates of the Johnson & Johnson family of companies, welcome the opportunity to comment on the proposed labeling for combined oral contraceptives (COCs). We have several broad comments regarding the draft guidance. These general comments are found below. More specific comments and recommendations as they pertain to various sections of the draft proposed guidance is included in enclosed attachment (see attachment #1) in bolded and italicized text. Additionally, a suggested list of recent references in support of some of the safety information in the oral contraceptive labeling is provided in attachment #2.

In general, the proposed draft guidance simplifies the language describing warnings, contraindications, precautions, and adverse reactions. While we support efforts to write useful, clear product labeling that best facilitates safe and effective use of drug products, there can be disadvantages to oversimplifying language regarding risks. Specific language has been deleted from the proposed draft guidance and conclusions inserted regarding certain risks, which have the effect of making risk/benefit judgments on behalf of the healthcare professional. As a commercial marketer, we believe it is our responsibility to objectively relate the risks of oral contraceptive use so as to fairly and adequately inform those who prescribe our products. This includes the scientific basis for such where appropriate, thus allowing the healthcare professional to make his or her own clinical decision regarding the appropriate patients to receive the product. Therefore, many of our comments to the draft

guidance recommend use of more specific and explicit language to better inform the healthcare provider regarding the risks and benefits of combined oral contraceptives. We note that FDA did not specify the references that support the changes made to the draft labeling. Although we have relied upon the published scientific literature in analyzing the proposal, complete evaluation of this document is very difficult without knowledge of the scientific bases for FDA's proposals. We recommend that FDA disclose the specific references to the literature it relied upon to modify labeling content. We also advocate retention of the References section so that we can have a full understanding of the agency's position regarding certain portions of its recommendations. In addition, a comprehensive references section would enable health care professionals to evaluate primary data used to develop class labeling.

We also note that much of the information in the labeling is based on older studies in which patients used oral contraceptives with higher formulations of estrogen and progestin than those in common use today. It's unclear whether data from higher dose formulations are applicable to currently marketed lower dose (i.e., < 35 µg of ethinyl estradiol) formulations, especially with regard to safety. For this reason, we have specifically recommended the inclusion of a statement regarding this in the WARNINGS section (line 125).

In closing, we appreciate the opportunity to comment of this draft guidance and thank the Agency in advance for its thoughtful consideration of our revisions.

Sincerely,

Johnson & Johnson Pharmaceutical Research & Development, L.L.C.



Bonnie J. Goldmann, MD  
Senior Vice President  
Global Regulatory Affairs and Quality Assurance