DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-441

Wyeth Consumer Healthcare
Attention: Filomena Gesek, Associate Director, Regulatory Affairs
5 Giralda Farms
Madison, NJ 07940

Dear Ms. Gesek:

Please refer to your new drug application (NDA) 21-441 dated February 28, 2002, received March 1, 2002, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Advil Allergy Sinus (ibuprofen 200 mg, pseudoephedrine 30 mg and chlorpheniramine 2 mg) Caplet.

We also acknowledge receipt of your submissions dated July 9, 2002, August 26 and 27, 2002, September 16, 2002 November 14 and 25, 2002, and December 6,10 and 18, 2002.

This new drug application provides for the use of Advil Allergy Sinus Caplet for temporary relief of symptoms associated with hay fever or other upper respiratory allergies, and the common cold.

We completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text.

The final printed labeling (FPL) for the 10-count, 20-count, 40-count, 1-count pouch and pouch dispenser must be identical in content to the enclosed 40-count carton label and the 10-count blister pack label submitted November 25, 2002. Blister pack labeling is not applicable to the 1-count pouch and pouch dispenser.

We remind you of your commitment, as presented in your December 18, 2002, submission, to implement the following revisions in the next printing of the labeling to be distributed when existing quantities of approved labeling have been exhausted. In the Drug Facts portion of the label, under ***Warnings***, your approved labeling contains a statement that reads:

Taking more than recommended may cause stomach bleeding.

Per your agreement, ***Warnings*** will be revised in the next printing to include a subheader as follows:

Stomach Bleeding Warning: Taking more than recommended may cause stomach bleeding.

Please submit an electronic version of the FPL according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA*. Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Individually mount ten of the copies on heavy-weight paper or similar material. For administrative purposes, designate this submission "**FPL for approved NDA 21-441**." Approval of this submission by FDA is not required before the labeling is used.

On August 21, 2002, the Agency published a proposed rule to include ibuprofen as a generally recognized as safe and effective ingredient in the monograph for internal analgesic, antipyretic and antirheumatic drug products. On September 20, 2002, the Non-Prescription Drug Advisory Committee made recommendations for additional warnings for non-steroidal anti-inflammatory drugs. As this rulemaking process continues, it is

possible that the warning statements may differ from those approved in this application. Once final warning statements are established through the rulemaking process, your label may need to be revised.

FDA's Pediatric Rule [at 21 CFR 314.55/21 CFR 601.27] was challenged in court. On October 17, 2002, the court ruled that FDA did not have the authority to issue the Pediatric Rule and has barred FDA from enforcing it. Although the government decided not to pursue an appeal in the courts, it will work with Congress in an effort to enact legislation requiring pharmaceutical manufacturers to conduct appropriate pediatric clinical trials. In addition, third party interveners have decided to appeal the court's decision striking down the rule. Therefore, we encourage you to submit a pediatric plan that describes development of your product in the pediatric population where it may be used. Please be aware that whether or not this pediatric plan and subsequent submission of pediatric data will be required depends upon passage of legislation or the success of the third party appeal. In any event, we hope you will decide to submit a pediatric plan and conduct the appropriate pediatric studies to provide important information on the safe and effective use of this drug in the relevant pediatric populations.

The pediatric exclusivity provisions of FDAMA as reauthorized by the Best Pharmaceuticals for Children Act are not affected by the court's ruling. Pediatric studies conducted under the terms of section 505A of the Federal Food, Drug, and Cosmetic Act may result in additional marketing exclusivity for certain products. You should refer to the Guidance for Industry on Qualifying for Pediatric Exclusivity (available on our web site at www.fda.gov/cder/pediatric) for details. If you wish to qualify for pediatric exclusivity you should submit a "Proposed Pediatric Study Request". FDA generally does not consider studies submitted to an NDA before issuance of a Written Request as responsive to the Written Request. Applicants should obtain a Written Request before submitting pediatric studies to an NDA.

In addition, we request that you submit two copies of the introductory promotional materials you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to the Division of Anti-Inflammatory, Analgesic and Ophthalmic Drug Products, HFD-550 and one to the Division of Over-the-Counter Drug Products, HFD-560.

Please submit one market package of the drug product when it is available.

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

Oversight of this application is being transferred to the Division of Over-the-Counter Drug Products.

If you have any questions, please call Ms. Elaine Abraham, Regulatory Project Manager at (301) 827-2222.

Sincerely,

{See appended electronic signature page}

Charles Ganley, MD
Director
Division of Over-the-Counter Drug Products, HFD-560
Ophthalmic Center for Drug Evaluation and Research

{See appended electronic signature page}

Lee S. Simon, MD
Director
Division of Anti-Inflammatory, Analgesic and Drug Products, HFD-550
Center for Drug Evaluation and Research

Enclosure

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

/s/

Charles Ganley
12/19/02 03:53:57 PM

Lee Simon
12/19/02 05:26:53 PM