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VIA FEDERAL EXPRESS

October 10, 2002

Dockets Management Branch  
Food and Drug Administration  
Department of Health and Human Services  
HFA-305, Room 1061  
5630 Fishers Lane  
Rockville, MD 20852

### SUITABILITY PETITION

This petition is submitted pursuant to 21 CFR §10.20 and §10.30, as provided for in 21 CFR §314.93 and Section 505(j)(2)(c) of the Federal Food, Drug and Cosmetic Act, to request the Commissioner of the Food and Drug Administration to declare that the drug product Cefpodoxime Proxetil Tablets for Oral Suspension 50 mg and 100 mg are suitable for submission as an abbreviated new drug application (ANDA).

#### A. Action Requested

The petition is submitted for a change in dosage form of the drug product from "Granules for Oral Suspension" to "Tablets for Oral Suspension". The reference listed drug product is Vantin® Granules for Oral Suspension 50 mg/5 mL and 100 mg/5 mL manufactured by Pharmacia & Upjohn. Cefpodoxime Proxetil will be marketed as Tablets for Oral Suspension in dosage strengths of 50 mg and 100 mg. The drug, the route of administration and the recommendations for use are the same as the listed drug product. The proposed product would differ only in dosage form from Pharmacia & Upjohn's marketed product.

The proposed drug product is expected to demonstrate bioequivalence to the 100 mg/5 mL granules for oral suspension dosage form of the listed product; data will be submitted at a later date.

02P-0444

CPI

**B. Statement of Grounds**

Cefpodoxime Proxetil Tablets for Oral Suspension are presented for administration by dispersing a single tablet in a specified amount of water.

The new dosage form is expected to offer a better alternative to the powder for oral suspension due to the following advantages:

- Unit dose dispensing
- Convenience to the patient with respect to the ease of administration, even during travel
- Storage of the product will not require special conditions (e.g., refrigeration)
- Better precision of dosage over the traditional teaspoonful
- Ease of carrying

The proposed product will differ only in dosage form. The indications, strength, route of administration, intended patient population and recommendations for use will remain the same as the Pharmacia & Upjohn-marketed product; therefore, there will be no difference in the safety and efficacy of the proposed Tablets for Oral Suspension.

The package insert for Pharmacia & Upjohn's Vantin® (Attachment 1), as well as the draft package insert of the proposed Cefpodoxime Proxetil Tablets for Oral Suspension (Attachment 2), are provided with this petition.

**C. Pediatric Use Information**

As the package insert of Pharmacia & Upjohn's Vantin® granules for oral suspension contains adequate dosing and administration information for the pediatric population, no additional studies are required.

**D. Environmental Impact**

An environmental assessment report on the action requested in this petition is not required under 21 CFR §25.31.

**E. Economic Impact**

The petitioner does not believe that this is applicable in this case, but will agree to provide such an analysis if requested by the agency.



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**F. Certification**

The undersigned certifies that to the best of his knowledge, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioner which are unfavorable to the petition.

Sincerely,



Nicholas M. Fleischer, R.Ph., Ph.D.  
Director of Biopharmaceutics  
THE WEINBERG GROUP INC.

NMF/kh

Enclosure

cc Gary Buehler, Director, Office of Generic Drugs (w/encl.)

