



8234 '00 AUG -3 19:57

Stanford Research Park
1050 Arastradero Road
Palo Alto, CA 94304
T: 650.849.8505 F: 650.849.8565

June 19, 2000

Dockets Management Branch
Food and Drug Administration
Department of Health and Human Services
Room 1-23
12420 Parklawn Drive
Rockville, MD 20857

CITIZEN'S PETITION

The undersigned submits this petition pursuant to 21CFR 314.93 to request that the Commissioner of Food and Drugs permit the filing of an Abbreviated New Drug Application for a drug that has the same active ingredient in the same strength as a drug listed in FDA's publication entitled "Approved Drug Products with Therapeutic Equivalence Evaluations," current Internet edition, but differs in its dosage form.

A. Action requested

By this petition, we hereby request the Agency to permit the filing of an Abbreviated New Drug Application for an Over-The-Counter (OTC) drug product, Famotidine Orally Disintegrating Tablets, 10 mg, a tablet that disintegrates quickly in the oral cavity. This drug differs from the reference listed drug (RLD), Pepcid AC Tablets, 10 mg, only in its dosage form.

B. Statement of grounds

In accordance with section 505(j)(2)(C) of the Federal Food, Drug, and Cosmetic Act, a petition may be filed with the Agency seeking permission to file an Abbreviated New Drug Application for a new drug which differs from a "listed" drug in dosage form. The Act stipulates that such a petition must be approved by the Agency unless there is a finding that investigations are needed to demonstrate the safety and effectiveness of the proposed drug product.

The reference listed drug product, Merck's Pepcid AC Tablets, 10 mg, NDA 20-325, is identified in the Over-The-Counter Drug Product List of the FDA's "Approved Drug Products with Therapeutic Equivalence Evaluations" (Orange Book) as supplied in the current version of the CDER Internet web site. A print-out of this listing, classified by active ingredient, is provided in Attachment A.

00P-1433

CPI

We propose to develop an orally disintegrating form of the tablet, for over-the-counter distribution, in the same dosage strength as the reference listed drug. Thus, the proposed product will be labeled with the same dosage recommendations as the listed drug and is expected to have the same therapeutic effect when used as indicated in the labeling. The labeling for the listed drug, Johnson&Johnson/Merck's Pepcid AC, is included in Attachment B. Labeling for the more recently approved related product, Johnson&Johnson/Merck's Pepcid AC Gelcap is also provided in Attachment C. The labeling of the proposed product is expected to be substantially the same as that for the RLD, with the exception of the mode of administration which will instruct the user to swirl the tablet between the tongue and roof of the mouth to promote disintegration before swallowing. The labeling will not require that a drink of water follow ingestion of the product. A copy of the draft proposed package insert, which also incorporates language recently approved for Pepcid AC Gelcaps, is provided in Attachment D.

The new dosage form will facilitate use of the product by persons who are unable to chew or ingest a tablet.

C. Environmental impact

An environmental impact analysis report is not required for this petition per 21CFR 25.24.

D. Economic impact

This information will be provided upon request from the Agency.

E. Certification

The undersigned certifies that, to the best knowledge of the undersigned, 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.

Should you have any questions concerning the foregoing, please contact me by phone: 1-877-342-0895 (toll free) or (650) 849-8587, or by fax: (650) 849-7887 or (650) 849-8622, or by e-mail: rkrishna@ypharma.com.

Sincerely,



Raan V. Krishna, Ph. D.
Manager, Regulatory Affairs
Yamanouchi Pharma Technologies, Inc.

Enclosures

**Suitability Petition for an Over-The-Counter (OTC) drug product,
Famotidine Orally Disintegrating Tablets, 10 mg**

Table of Contents

Citizen's Petition.....	1
Action requested.....	1
Statement of grounds.....	1
Environmental impact.....	2
Economic impact.....	2
Certification.....	2
Attachment A.....	4
Attachment B.....	6
Attachment C.....	11
Attachment D.....	13

ATTACHMENT A

ATTACHMENT A
Orange Book Listings for Famotidine 10 mg OTC

Active Ingredient Search Results from "OTC" table for query on "famotidine."

Appl No	<u>RLD</u>	Active Ingredient	Dosage Form; Route	Strength	Proprietary Name	Applicant
<u>020801</u>	Yes	FAMOTIDINE	Tablet, Chewable; Oral	10MG	PEPCID AC	MERCK
<u>020325</u>	Yes	FAMOTIDINE	Tablet; Oral	10MG	PEPCID AC	MERCK
<u>020902</u>	No	FAMOTIDINE	Tablet; Oral	10MG	PEPCID AC	MERCK

ATTACHMENT B

ATTACHMENT B

Labeling for the Listed Drug Pepcid AC Tablets

PDR® entry for
Pepcid AC Tablets (J&J -- Merck Consumer)

DESCRIPTION

ACTIVE INGREDIENT: Famotidine 10 mg per tablet.

INACTIVE INGREDIENTS: Hydroxypropyl cellulose, hydroxypropyl methylcellulose, red iron oxide, magnesium stearate, microcrystalline cellulose, starch, talc, titanium dioxide.

Product Benefits:

- **1 tablet** relieves heartburn and acid indigestion.
- Pepcid AC prevents heartburn and acid indigestion brought on by consuming food and beverages.

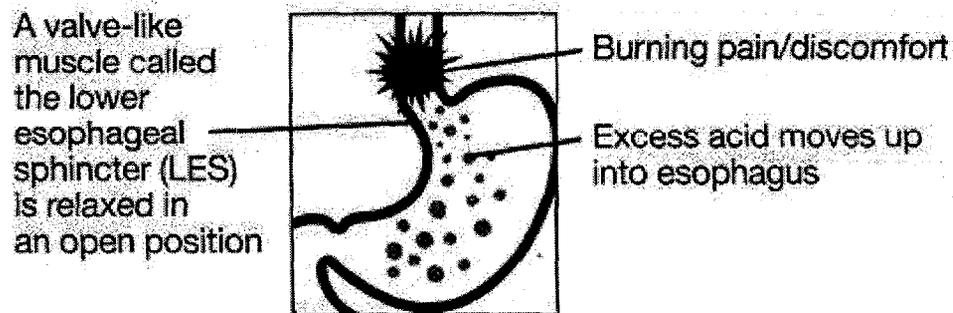
It contains famotidine, a prescription-proven medicine.

The ingredient in PEPCID AC, famotidine, has been prescribed by doctors for years to treat millions of patients safely and effectively. The active ingredient in PEPCID AC has been taken safely with many frequently prescribed medications.

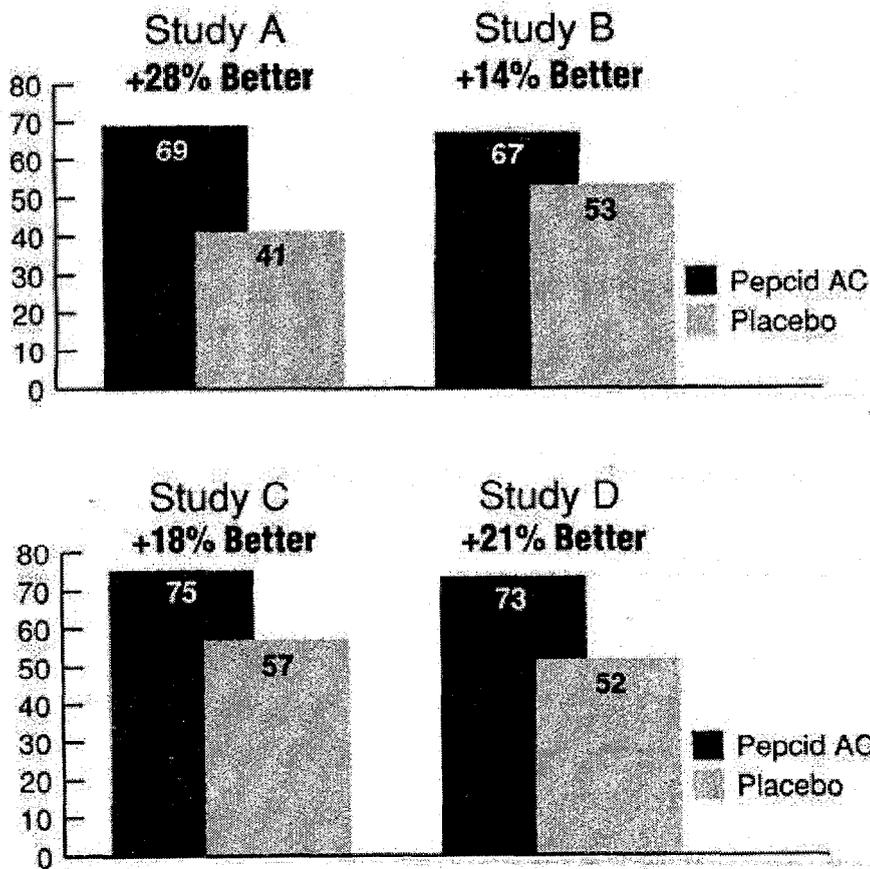
ACTION

It is normal for the stomach to produce acid, especially after consuming food and beverages. However, acid in the wrong place (the esophagus), or too much acid, can cause burning pain and discomfort that interfere with everyday activities.

- **Heartburn--Caused by acid in the esophagus**



In clinical studies, PEPCID AC was significantly better than placebo pills in relieving and preventing heartburn.



USES

- For Relief of heartburn, associated with acid indigestion, and sour stomach;
- For Prevention of heartburn associated with acid indigestion and sour stomach brought on by consuming food and beverages.

Tips for Managing Heartburn

- Do not lie flat or bend over soon after eating.
- Do not eat late at night, or just before bedtime.
- Avoid food or drinks that are more likely to cause heartburn, such as rich, spicy, fatty, and fried foods, chocolate, caffeine, alcohol, and even some fruits and vegetables.
- Eat slowly and do not eat big meals.
- If you are overweight, lose weight.
- If you smoke, quit smoking.
- Raise the head of your bed.
- Wear loose fitting clothing around your stomach.

WARNINGS

Allergy Warning: Do not use if you are allergic to Pepcid AC (famotidine) or other acid reducers.

- Do not take the maximum daily dosage for more than 2 weeks continuously except under the advice and supervision of a doctor.
- Do not use with other acid reducers.
- If you have trouble swallowing, or persistent abdominal pain, see your doctor promptly. You may have a serious condition that may need different treatment.
- As with any drug, if you are pregnant or nursing a baby, seek the advice of a health professional before using this product.
- Keep this and all drugs out of the reach of children.
- In case of accidental overdose, seek professional assistance or contact a poison control center immediately.

CAUTION

Heartburn and acid indigestion are common, but you should see your doctor promptly if:

- You have trouble swallowing or persistent abdominal pain. You may have a serious condition that may need different treatment.
- You have used the maximum dosage every day for two weeks continuously.

Important: As with any drug, if you are pregnant or nursing a baby, seek the advice of a health professional before using this product. This product should not be given to children under 12 years old, unless directed by a doctor. Keep this and all drugs out of the reach of children. In case of accidental overdose, seek professional assistance or contact a poison control center immediately.

DIRECTIONS

- To relieve symptoms, swallow 1 tablet with a glass of water.
- To prevent symptoms, swallow 1 tablet with a glass of water at any time from 15 to 60 minutes before eating food or drinking beverages that cause heartburn.
- Can be used up to twice daily (up to 2 tablets in 24 hours).
- This product should not be given to children under 12 years old unless directed by a doctor.

HOW SUPPLIED

Pepcid AC is available as a rose-colored tablet identified as 'PEPCID AC'.

Pepcid AC is available in blister packs in boxes of 6, 12, 18, 30, 60, and 90 tablets. NDC 16837-872

- Read the directions and warnings before use.
- Keep the carton. It contains important information.

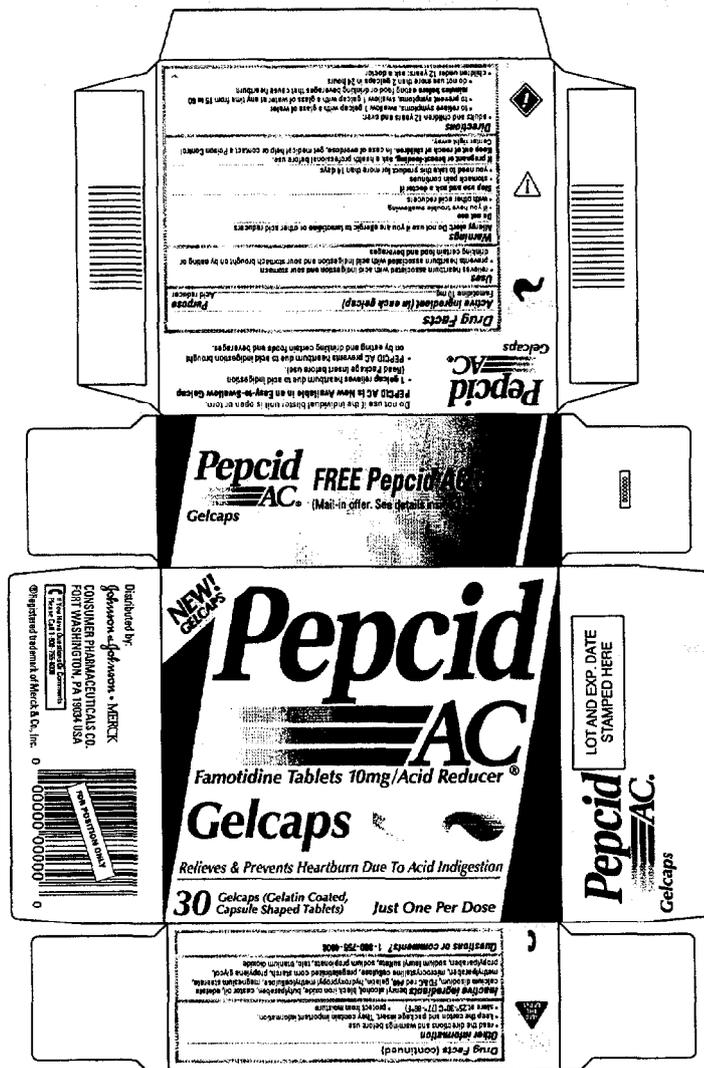
Store at 25°- 30°C (77-86°F).

Protect from moisture.

PRODUCT PHOTO(S):

NOTE: These photos can be used only for identification by shape, color, and imprint. They do not depict actual *or relative* size.

The product samples shown here have been supplied by the manufacturer and reproduced in full color by PDR as a quick-reference identification aid. While every effort has been made to assure accurate reproduction, please remember that any visual identification should be considered preliminary. In cases of poisoning or suspected overdose, the drug's identity should be verified by chemical analysis.



ATTACHMENT C

ATTACHMENT C Labeling for the Related Product Pepcid AC Gelcaps

Do not use if the individual blister unit is open or torn.

WHAT YOU SHOULD KNOW ABOUT:



Pepcid AC
Famotidine Tablets 10mg/
Acid Reducer
Gelcaps

PACKAGE INSERT

A non-prescription stomach medicine

PEPCID AC Gelcaps contain a medicine, different from antacids, that doctors have prescribed for years to treat acid-related problems in millions of people.

Product Benefits:

- 1 gelcap relieves heartburn due to acid indigestion.
- Pepcid AC prevents heartburn due to acid indigestion brought on by eating and drinking certain foods and beverages.
- It contains famotidine, a prescription-proven medicine.

Shown actual size

How to use PEPCID AC Gelcaps

Use PEPCID AC Gelcaps to relieve or prevent heartburn due to acid indigestion and sour stomach.

TO RELIEVE SYMPTOMS
Swallow 1 gelcap with a glass of water (do not chew).

PEPCID AC can be used up to twice daily (up to 2 gelcaps in 24 hours).

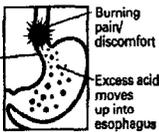
TO PREVENT SYMPTOMS
Swallow 1 gelcap with a glass of water at any time from 15 to 60 minutes before eating food or drinking beverages that cause heartburn.

Excess acid: a burning problem

It is normal for the stomach to produce acid, especially after consuming food and beverages. However, acid in the wrong place (the esophagus), or too much acid, can cause burning pain and discomfort that interfere with everyday activities.

Heartburn—
Caused by acid in the esophagus

A valve-like muscle called the lower esophageal sphincter (LES) is relaxed in an open position



Burning pain/discomfort

Excess acid moves up into esophagus

Tips for Managing Heartburn

- Do not lie flat or bend over soon after eating.
- Do not eat late at night, or just before bedtime.
- Certain foods or drinks are more likely to cause heartburn, such as rich, spicy, fatty, and fried foods, chocolate, caffeine, alcohol, and even some fruits and vegetables.
- Eat slowly and do not eat big meals.
- If you are overweight, lose weight.
- If you smoke, quit smoking.
- Raise the head of your bed.
- Wear loose fitting clothing around your stomach.

Proven effective in clinical studies

In clinical studies, PEPCID AC film-coated tablets were significantly better in relieving and preventing heartburn than placebo tablets (tablets without the medicine). PEPCID AC Gelcaps contain the same active ingredient.

Percent of heartburn episodes completely relieved

Study	Time	PEPCID AC	Placebo
Study A	15 minutes*	69	40
	60 minutes*	61	40
Study B	15 minutes*	69	40
	60 minutes*	73	40

Percent of patients with prevention or reduction of heartburn symptoms

Study	Time	PEPCID AC	Placebo
Study C	15 minutes*	69	40
	60 minutes*	73	40
Study D	15 minutes*	69	40
	60 minutes*	73	40

*Time taken before eating a meal that is expected to cause symptoms.

Excellent safety record

The ingredient in PEPCID AC, famotidine, has been prescribed by doctors for years to treat millions of patients safely and effectively. The active ingredient in PEPCID AC has been taken safely with many frequently prescribed medications.

Know when to see your doctor

Heartburn and acid indigestion are common, but you should stop taking PEPCID AC and see your doctor promptly if:

- You have trouble swallowing or stomach pain continues. You may have a serious condition that may need different treatment.
- You need to take this product for more than 14 days.

Important: Allergy alert: Do not use if you are allergic to famotidine or other acid reducers. Do not use with other acid reducers. This product should not be given to children under 12 years old, unless directed by a doctor. As with any drug, if you are pregnant or nursing a baby, seek the advice of a health professional before using this product. Keep this and all drugs out of the reach of children. In case of accidental overdose, seek professional assistance or contact a poison control center immediately.

Questions or comments?

 Please call 1-800-755-4008 for more information and a guide of how to help your heartburn.

© Registered trademark of Merck & Co., Inc.
Distributed by:
Johnson & Johnson • MERCK
CONSUMER PHARMACEUTICALS CO.
FORT WASHINGTON, PA 19034 USA

COUPON

ATTACHMENT D

ATTACHMENT D
Proposed Labeling for Famotidine Orally-Disintegrating Tablets

Changes to RLD Labeling Highlighted

~~Pepeid AC Tablets (J&J—Merek Consumer)~~
FAMOTIDINE Orally-Disintegrating Tablets, USP, 10 mg

DESCRIPTION

ACTIVE INGREDIENT: Famotidine 10 mg per tablet.

Famotidine orally-disintegrating tablets contain a medicine, different from antacids, that doctors have prescribed for years to treat acid-related problems in millions of people.

INACTIVE INGREDIENTS: ~~Hydroxypropyl cellulose, hydroxypropyl methylcellulose, red iron oxide, magnesium stearate, microcrystalline cellulose, starch, talc, titanium dioxide.~~

Product Benefits:

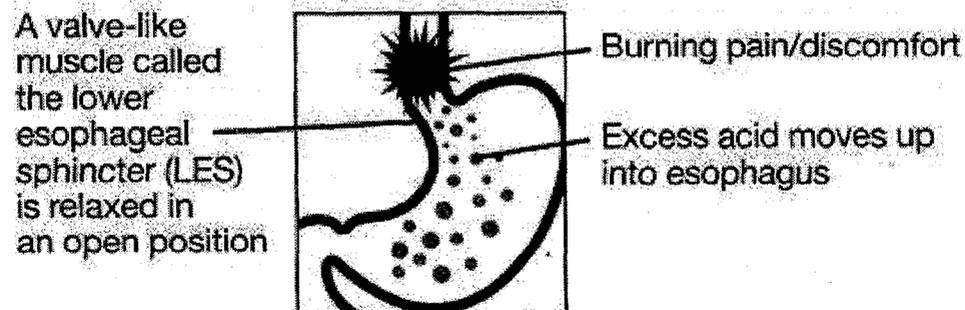
- **1 tablet** relieves heartburn due to~~and~~ acid indigestion.
- ~~Pepeid AC~~ Famotidine orally-disintegrating tablets prevents heartburn due to~~and~~ acid indigestion brought on by consuming food and beverages.
- ~~It~~ They contains famotidine, a prescription-proven medicine.

The ingredient in famotidine orally-disintegrating tablets ~~PEPCID AC~~, famotidine, has been prescribed by doctors for years to treat millions of patients safely and effectively. The active ingredient in ~~PEPCID AC~~ has been taken safely with many frequently prescribed medications.

ACTION

It is normal for the stomach to produce acid, especially after consuming food and beverages. However, acid in the wrong place (the esophagus), or too much acid, can cause burning pain and discomfort that interfere with everyday activities.

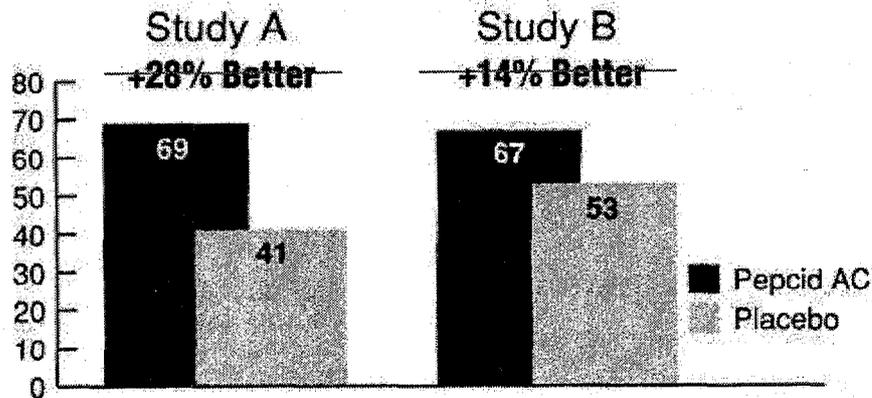
- **Heartburn--Caused by acid in the esophagus**



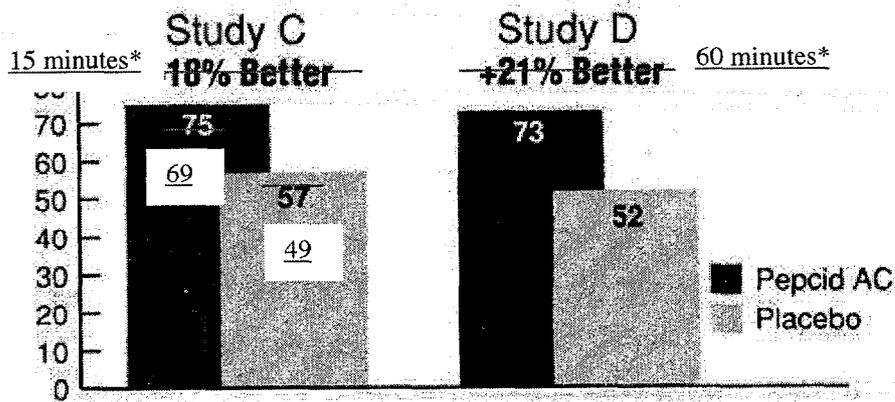
In clinical studies, PEPCID AC film-coated tablets famotidine ~~were~~ as significantly better than placebo pills in relieving and preventing heartburn ~~than placebo tablets (tablets~~

without the medicine). Famotidine orally-disintegrating tablets contain the same active ingredient.

Percent of heartburn episodes completely relieved



Percent of patients with prevention or reduction of heartburn symptoms



*Time take before eating a meal that is expected to cause symptoms.

USES

- **For Relief** of heartburn, associated with acid indigestion, and sour stomach;
- **For Prevention** of heartburn associated with acid indigestion and sour stomach brought on by consuming food and beverages.

Tips for Managing Heartburn

- Do not lie flat or bend over soon after eating.
- Do not eat late at night, or just before bedtime.
- Certain Avoid foods or drinks that are more likely to cause heartburn, such as rich, spicy, fatty, and fried foods, chocolate, caffeine, alcohol, and even some fruits and vegetables.
- Eat slowly and do not eat big meals.
- If you are overweight, lose weight.
- If you smoke, quit smoking.
- Raise the head of your bed.
- Wear loose fitting clothing around your stomach.

WARNINGS

Important: Allergy alert: Allergy Warning: Do not use if you are allergic to Pepcid AC (famotidine) or other acid reducers.

- Do not take the maximum daily dosage for more than 2 weeks continuously except under the advice and supervision of a doctor.
- Do not use with other acid reducers.
- If you have trouble swallowing, or persistent abdominal pain, see your doctor promptly. You may have a serious condition that may need different treatment.
- As with any drug, if you are pregnant or nursing a baby, seek the advice of a health professional before using this product.
- Keep this and all drugs out of the reach of children.
- In case of accidental overdose, seek professional assistance or contact a poison control center immediately.

CAUTION

Heartburn and acid indigestion are common, but you should stop taking famotidine orally-disintegrating tablets and see your doctor promptly if:

- You have trouble swallowing or ~~stomach~~persistent abdominal pain continues. You may have a serious condition that may need different treatment.
- You need to take this product for more than 14 days, ~~have used the maximum dosage every day for two weeks continuously~~.

Important: As with any drug, if you are pregnant or nursing a baby, seek the advice of a health professional before using this product. This product should not be given to children under 12 years old, unless directed by a doctor. Keep this and all drugs out of the reach of children. In case of accidental overdose, seek professional assistance or contact a poison control center immediately.

DIRECTIONS

- To relieve symptoms, swallow place 1 tablet on the tongue and press against roof of mouth, swirl with tongue, and swallow with a glass of water.
- To prevent symptoms, swallow place 1 tablet on the tongue and press against roof of mouth, swirl with tongue and swallow, with a glass of water at any time from 15 to 60 minutes before eating food or drinking beverages that cause heartburn.
- Can be used up to twice daily (up to 2 tablets in 24 hours).
- This product should not be given to children under 12 years old unless directed by a doctor.

HOW SUPPLIED

<To be determined>

Pepcid AC is available as a rose-colored tablet identified as 'PEPCID AC'.

Pepcid AC is available in blister packs in boxes of 6, 12, 18, 30, 50, and 80 tablets. NDC 16837-872

- Read the directions and warnings before use.
- Keep the carton. It contains important information.

Store ~~at~~between 25°- 30°C (77-86°F).

Protect from moisture.

Revised Label, Showing Proposed Changes Incorporated

FAMOTIDINE Orally-Disintegrating Tablets, USP, 10 mg

DESCRIPTION

ACTIVE INGREDIENT: Famotidine 10 mg per tablet.

Famotidine orally-disintegrating tablets contain a medicine, different from antacids, that doctors have prescribed for years to treat acid-related problems in millions of people.

Product Benefits:

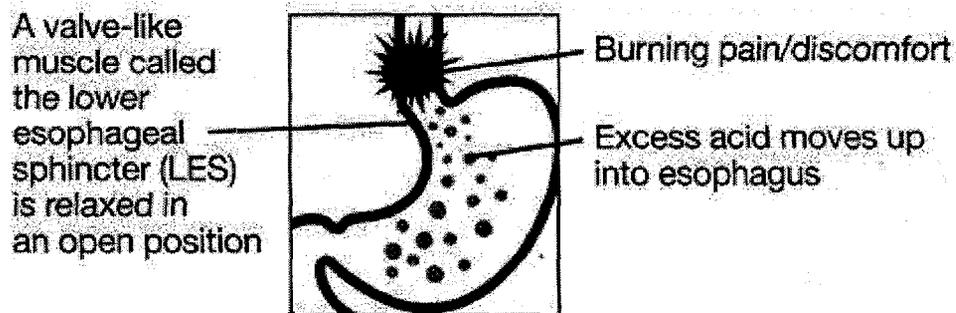
- **1 tablet** relieves heartburn due to acid indigestion.
- Famotidine orally-disintegrating tablets prevent heartburn due to acid indigestion brought on by consuming food and beverages.
- They contain famotidine, a prescription-proven medicine.

The ingredient in famotidine orally-disintegrating tablets, famotidine, has been prescribed by doctors for years to treat millions of patients safely and effectively. The active ingredient has been taken safely with many frequently prescribed medications.

ACTION

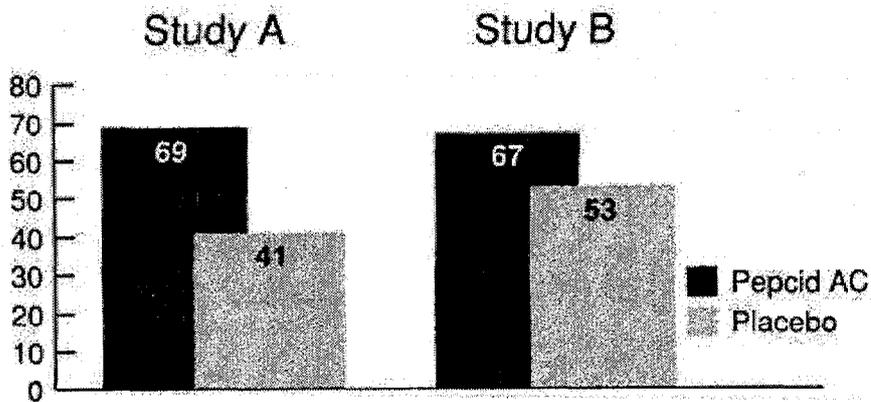
It is normal for the stomach to produce acid, especially after consuming food and beverages. However, acid in the wrong place (the esophagus), or too much acid, can cause burning pain and discomfort that interfere with everyday activities.

- **Heartburn--Caused by acid in the esophagus**

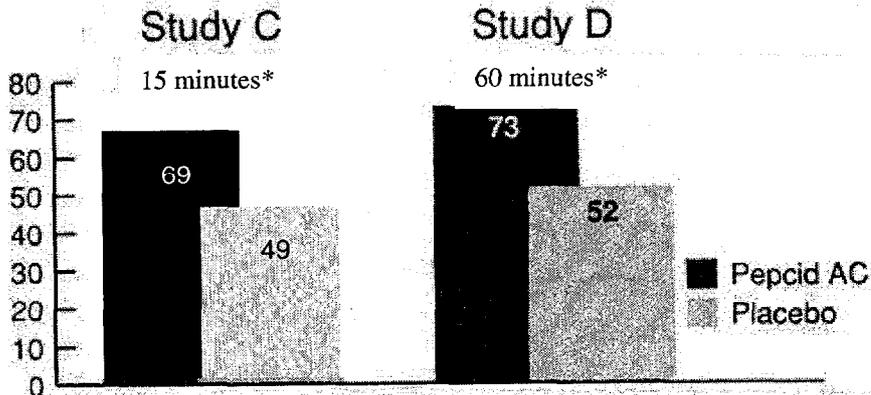


In clinical studies, PEPCID AC film-coated tablets were significantly better in relieving and preventing heartburn than placebo tablets (tablets without the medicine). Famotidine orally-disintegrating tablets contain the same active ingredient.

Percent of heartburn episodes completely relieved



Percent of patients with prevention or reduction of heartburn symptoms



*Time take before eating a meal that is expected to cause symptoms.

USES

- **For Relief of heartburn, associated with acid indigestion, and sour stomach;**
- **For Prevention of heartburn associated with acid indigestion and sour stomach brought on by consuming food and beverages.**

Tips for Managing Heartburn

- Do not lie flat or bend over soon after eating.
- Do not eat late at night, or just before bedtime.
- Certain foods or drinks are more likely to cause heartburn, such as rich, spicy, fatty, and fried foods, chocolate, caffeine, alcohol, and even some fruits and vegetables.
- Eat slowly and do not eat big meals.
- If you are overweight, lose weight.
- If you smoke, quit smoking.
- Raise the head of your bed.
- Wear loose fitting clothing around your stomach.

WARNINGS

Important: Allergy alert: Do not use if you are allergic to famotidine or other acid reducers.

- Do not take the maximum daily dosage for more than 2 weeks continuously except under the advice and supervision of a doctor.
- Do not use with other acid reducers.
- If you have trouble swallowing, or persistent abdominal pain, see your doctor promptly. You may have a serious condition that may need different treatment.
- As with any drug, if you are pregnant or nursing a baby, seek the advice of a health professional before using this product.
- Keep this and all drugs out of the reach of children.
- In case of accidental overdose, seek professional assistance or contact a poison control center immediately.

CAUTION

Heartburn and acid indigestion are common, but you should stop taking famotidine orally-disintegrating tablets and see your doctor promptly if:

- You have trouble swallowing or stomach pain continues. You may have a serious condition that may need different treatment.
- You need to take this product for more than 14 days.

Important: As with any drug, if you are pregnant or nursing a baby, seek the advice of a health professional before using this product. This product should not be given to children under 12 years old, unless directed by a doctor. Keep this and all drugs out of the reach of children. In case of accidental overdose, seek professional assistance or contact a poison control center immediately.

DIRECTIONS

- To relieve symptoms, place 1 tablet on the tongue and press against roof of mouth, swirl with tongue, and swallow.
- To prevent symptoms, place 1 tablet on the tongue and press against roof of mouth, swirl with tongue and swallow, at any time from 15 to 60 minutes before eating food or drinking beverages that cause heartburn.
- Can be used up to twice daily (up to 2 tablets in 24 hours).
- This product should not be given to children under 12 years old unless directed by a doctor.

HOW SUPPLIED

<To be determined>

- Read the directions and warnings before use.
- Keep the carton. It contains important information.

Store at 25°- 30°C (77-86°F).

Protect from moisture.



**Yamanouchi Pharma
Technologies, Inc.**

8235 '00 AUG -3 A9:57

Stanford Research Park
1050 Arastradero Road
Palo Alto, CA 94304
T: 650.849.8505 F: 650.849.8565

CITIZEN'S PETITION -- Suitability Petition for an Over-The-Counter (OTC) drug product, Famotidine Orally Disintegrating Tablets, 10 mg.

June 19, 2000

To: Dockets Management Branch
U.S. Food and Drug Administration
Department of Health and Human Services
Room 1-23
12420 Parklawn Drive
Rockville, MD 20857

Re: CITIZEN'S PETITION -- Suitability Petition for an Over-The-Counter (OTC) drug product, Famotidine Orally Disintegrating Tablets, 10 mg.

Dear Sir or Madam:

Enclosed please find an original and 3 copies of a petition submitted pursuant to 21CFR 314.93, to the Commissioner of Food and Drug Administration by the undersigned on behalf of the Yamanouchi Pharma Technologies Inc. By this petition, we hereby request the Agency to permit the filing of an Abbreviated New Drug Application for an Over-The-Counter (OTC) drug product, Famotidine Orally Disintegrating Tablets, 10 mg, a tablet that disintegrates quickly in the oral cavity. This drug differs from the reference listed drug (RLD), Pepcid AC Tablets, 10 mg, only in its dosage form. The information described in this Suitability Petition include: A. Action requested, B. Statement of grounds, C. Environmental impact, D. Economic impact, E. Certification and Enclosures containing Labels and Labeling information.

Please contact me regarding any questions or comments, at Phone: 1-877-342-0895 (toll free) or (650) 849-8587, or by Fax: (650) 849-7887 or (650) 849-8622, or by E-mail: rkrishna@ypharma.com.

Sincerely,

Raan V. Krishna
Raan V. Krishna, Ph. D.
Manager, Regulatory Affairs

Urgent

1000 **WASH**

Rockville

20857

emp# 220636 21JUN00

FedEx

PRIORITY OVERNIGHT

WED

Master

FORM

001/002 NPS#: 7908 5331 7029 FORM 0201

Deliver By:
21 JUN 00
AA

20857 -MD-US

IAD
19 GAIA

