



Taro Pharmaceuticals U.S.A., Inc.

July 1, 2003

Dockets Management Branch  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061 (HFA-305)  
Rockville, Maryland 20852

### CITIZEN PETITION

The undersigned submits this petition pursuant to section 505 (j) (2) (c) of the Federal Food, Drug, and Cosmetic Act and 21 CFR Parts 314.55 (d) (2) and 10.30 of the Food and Drug Administration's regulations, to request the Commissioner of the Food and Drug Administration to make a determination of ANDA suitability for Carbamazepine Oral Suspension USP, 200 mg/5 mL based on the reference-listed drug, Tegretol Oral Suspension, 100 mg/5 mL of Novartis Pharmaceuticals Corporation. [see exhibit 1]

#### A. Action Requested

The petitioner requests the Commissioner of the Food, and Drug Administration for a change to a listed drug to allow the undersigned to submit an Abbreviated New Drug Application for Carbamazepine Oral Suspension USP, 200 mg/5 mL. The reference-listed drug is Tegretol Oral Suspension, 100 mg/5 mL manufactured by Novartis Pharmaceuticals Corporation. The safety of the proposed strengths will be supported by a bioequivalence study conducted comparing the reference Tegretol Oral Suspension, 100 mg/5 mL of Norvatis and Carbamazepine Oral Suspension USP, 200 mg/5 mL by Taro.

It should be noted that this strength, 200 mg/5 mL of Carbamazepine Oral Suspension USP, was the subject of a previous citizen petition dated September 20, 1989. That petition was approved on May 16, 1991 (Docket No. 89P-0399/CP). However, that petition approval utilized Tegretol Tablets, 200 mg of Geigy Pharmaceuticals as the reference listed drug. Therefore, while our petition uses the Tegretol Oral Suspension USP, 100 mg/5 mL in lieu of the earlier petition's Tegretol Tablets, 200 mg, the previous approval nevertheless demonstrates that the proposed strength does not pose any questions of safety and effectiveness. A copy of the citizen petition approval letter is enclosed in this petition for your convenience [see exhibit 2].

2003P-0304

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## B. Statement of Grounds

Carbamazepine dosage should be adjusted to the needs of the individual patients. Carbamazepine oral suspension is approved for use at daily doses up to 1200 mg per day, with a usual maintenance dose of 400 mg per day. Because of the unique pharmacokinetic properties and potential severity of the side effects if patients are improperly monitored or dosed, and patients should be closely monitored by the physicians. The availability of a new strength of 200 mg/5 mL, by lowering the number of spoonfuls to be taken daily, will improve patient compliance and ease of administration.

The proposed Carbamazepine Oral Suspension USP, 200 mg/5 mL will be the same as the reference-listed product, Tegretol Oral Suspension, 100 mg/5 mL of Novartis Pharmaceuticals Corporation in respect of:

- Active ingredient, Carbamazepine USP
- Indications
- Dosing regimen
- Bioequivalence: the proposed strengths, 200 mg/5 mL will be dose proportional to Taro's 100 mg/5 mL potency which was approved on December 21, 2000, ANDA 75-875. A bioequivalence study will be conducted comparing Taro's Carbamazepine Oral Suspension 200 mg/5 mL to the reference-listed product, Tegretol Oral Suspension 100 mg/5 mL of Novartis Pharmaceuticals Corporation. *In-Vitro* dissolution profiles and assay will also be conducted on Taro's Carbamazepine Oral Suspension USP, 200 mg/5 mL by comparing them to Novartis' Tegretol Oral Suspension, 100 mg/5 mL.

Copies of the approved labeling for Tegretol Oral Suspension, 100 mg/5 mL of Novartis Pharmaceuticals Corporation [see exhibit 1]. The proposed labeling for Taro's Carbamazepine Oral Suspension USP, 200 mg/5 mL with highlighting of the changes is provided [see exhibit 3].

## C. Environmental Impact

The undersigned, hereby requests a categorical exclusion under 21 CFR 25.24 (c) (1). The proposed drug product will not be administered at higher dosage levels, for longer duration, or for different indications than for the reference-listed product.

## D. Economic Impact

This information will be submitted on request of the Commissioner.

E. Advantages

The proposed Carbamazepine Oral Suspension USP, 200 mg/5 mL will provide the physicians a greater flexibility in prescribing the drug.

F. Certification

The undersigned certifies, that to the best knowledge and belief 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.

Respectfully submitted,



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Avraham Yacobi, Ph.D.  
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