



Schering-Plough

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

Re: Docket No. 2005D-0011

Draft Guidance Labeling for Human Prescription Drug and biological Products – Implementing the New Content and Format Requirements

Draft Guidance Warnings and Precautions, Contraindications, and boxed Warning Sections of Labeling for Human Prescription Drug and Biological Products Content and Format

Dear Sir/Madam:

Schering-Plough has reviewed the above referenced draft guidances and we are providing these comments for your consideration.

I. Draft Guidance Labeling for Human Prescription Drug and biological Products – Implementing the New Content and Format Requirements

1. The following comments are with regard to Section **IV. Highlights**.
 - a. There is currently no instruction on the format to follow for this section for a combination product with 2 active ingredients. It is our recommendation that additional guidance be provided to industry with regard to format and content requirements for two active components taken together but presented in one formal FPI.
 - b. In section IV.B.1. *Initial U.S. Approval (201.57(a)(3))*, there is no instruction for the initial U.S. approval date for a generic drug. Please provide additional wording with regard to this specific label entity (lines 272-282).
 - c. For section IV.B.2. *Boxed Warnings (201.57(a)(4))*, the boxed warning should not be further summarized since the point is to provide emphasis on the major warnings in the FPI labeling. There is concern that if the Boxed Warning is not detailed (up to 20 line limit) in the Highlights section, the prescriber may not refer to the FPI and may miss pertinent information. Our recommendation

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would be to include the complete Boxed Warning in both the Highlights section and FPI (lines 284-297).

- d. With regard to section IV.B.3. *Recent Major Changes (201.57(a)(5))*, lines 346-355, **Listing related information from different FPI sections**, we recommend abbreviating the list of recent changes to conserve space, therefore we propose to use the numbers of the sections effected (i.e., 1.2; 2.2; etc.).

For the same section, lines 357-362, **Marking text in the FPI with a vertical line**, we propose to remove the vertical line since most recent changes are already listed within the Highlights section for emphasis.

- e. With regard to section IV.B.7. *Contraindications (201.57(a)(9))*, stating "none" (line 424) may not be appropriate since hypersensitivity to ingredients would be classified as a contraindication (despite FDA's newly announced preemption policy).
- f. In section IV.B.10. *Drug Interactions (201.57(a)(12))*, lines 503-507 require a disclaimer in the Drug Interactions heading in Highlights to alert the prescriber to the presence and significance of the drug interaction information in the FPI. A disclaimer here may be unnecessary, the prescriber should be consulting the DRUG INTERACTIONS section of the FPI. This seems to be a liability issue as the prescriber should not be depending solely on the HIGHLIGHTS section (also a disclaimer statement referring the physician to the FPI is already required at the end of the Highlights section)

2. The following comments are with regard to section **VI. Formatting**.

- a. There is no instruction on the format to follow if there is minimum content to populate both the Highlights and Indexing sections. Rules on formatting should be provided with regard to final presentation of the electronic presentation
- b. With regard to **VI.B. Omitted Sections (201.56(d)(4))**, readers may question why certain sections were omitted, especially if the number is not consistent. Perhaps "not applicable" is more suitable than completely removing the section (lines 709-745).

II. Draft Guidance Warnings and Precautions, Contraindications, and boxed Warning Sections of Labeling for Human Prescription Drug and Biological Products Content and Format

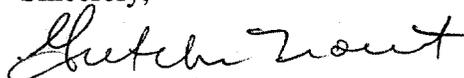
1. With regard to section II.C.4. *Cross-Referencing (lines 215-220)*, We recommend using only numbers of the pertinent sections to cross reference instead of stating the section effected (i.e., DRUG INTERACTIONS). This will help conserve

space and is also easy to locate since the FPI is now numbered by section (this is similar to the EU SmPC guidance for cross-referencing).

2. With regard to **Section III. Contraindications Section (201.57(c)(5)). A. When to Contraindicate**, stating "none" when there are no known contraindications for a drug may not be appropriate with hypersensitivity to ingredients (lines 225-230).

Schering-Plough appreciates the opportunity to comment on these draft guidances and we hope that you will take our comments under consideration.

Sincerely,



Gretchen Trout

Director

Regulatory Liaison and Policy

Worldwide Regulatory Affairs