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January 27, 1999

Janet Woodcock, M.D.
Director
Center for Drug Evaluation and Research
6027-42 Woodmont Building Two
1451 Rockville Pike (HFB-1)
Rockville, MD 20852

Dear Dr. Woodcock:

We are representatives of organizations which focus on women's health. We are writing to you because of our concern that at least one company is attempting to obtain FDA approval for an estrogens product the safety of which is unproven and unknown. FDA's approving that product may subject millions of women to risks which the Food, Drug, and Cosmetic Act was intended to protect against.

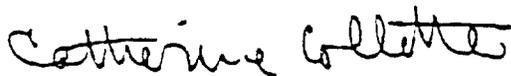
Many of us previously communicated to you our concern that the FDA not approve ANDAs for two estrogen products that were not the same as Premarin. We were pleased by your decision in 1997 not to allow such approvals. At that time, you concluded that a drug whose active ingredient is not identical to Premarin could not be assumed to have the same safety and efficacy profile as Premarin. That was precisely the issue that had prompted our previous concerns, and is precisely the issue that prompts us to write now.

We understand that one of the applicants whose ANDA was rejected in 1997, Duramed, has submitted an NDA for the same product whose ANDA was rejected. As far as we can tell from Duramed's public statements, it has conducted only one clinical study, on vasomotor symptoms, and has done none of the short or long term animal or human studies that FDA ordinarily requires for approval of an NDA. Instead, the company appears to be relying on safety data derived from studies of other estrogen products, especially Premarin. If that is the case, and in light of your own conclusion that this product is not the same as Premarin, we do not understand how data on Premarin contribute to an understanding of the safety of this Duramed drug. We know that FDA, in reviewing NDAs, sometimes relies on data derived from studies of a drug with the same active ingredient, but this is not that situation.

This is not a trivial point, for vasomotor symptoms often last for one to four years, and women may therefore be taking the Duramed drug for quite some time. Also, it is well known that women who start on estrogens for symptoms of menopause often continue estrogen replacement beyond the symptomatic stage of menopause to help prevent diseases such as osteoporosis. Thus, women for whom the Duramed product is prescribed may be taking for months or years a drug which has not itself been studied for safety, and which is also not the same as drugs which have been studied for safety.

We therefore ask that you review with special care Duramed's NDA to ensure that it fully satisfies the requirements of the Food, Drug, and Cosmetic Act. We know you to be concerned and cautious about women's health, and we ask you to apply that concern and caution to this issue.

Sincerely,



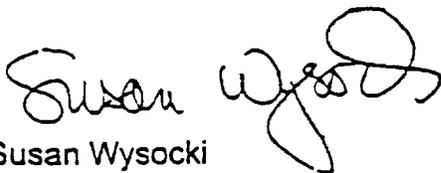
Catherine Colette
Director, Women's Rights Department
American Federation of State, County, and Municipal Employees, AFSCME



Wayne Shields
President & CEO
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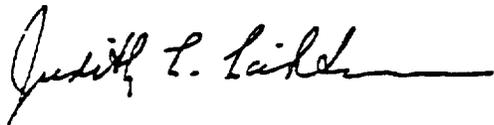
Leslie R. Wolfe
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Judith L. Lichtman
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