



Blue Cross of California

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Rec'd in DMB
1/13/99

January 12, 1999

Director of Regulatory Affairs
Pfizer US Pharmaceutical Group
235 E. 42nd Street
New York, NY 10017-5755

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Dear Sir or Madam:

On July 24, docket number 98P-0610/CP was filed with the Food and Drug Administration under the Code of Federal Regulations, Food and Drug Administration, Title-21, section 10.30. This regulation provides that drugs limited to prescription use under an NDA can be exempted from that limitation if the FDA determines the prescription requirements to be unnecessary for the protection of public health. My letter specifically petitions the FDA to convert non sedating antihistamines to OTC regulatory status.

Currently, the Federal Food and Drug Administration (FDA) authorizes over 100 different antihistamines for over-the-counter (OTC) sale. Although considered safe and effective by the FDA, all OTC antihistamines are non-selective and have a more significant sedative and anticholinergic effect than the three leading prescription antihistamine products. Your safest antihistamine medications are available only by a prescription in the United States and are described below:

Zyrtec (cetirizine tablets and syrups)

Maintaining Zyrtec as a prescription drug only, while the more dangerous antihistamine alternatives are available without a prescription, deprives a majority of patients ready access to quality pharmaceutical care. This lack of access results in a greater incidence of side effects associated with the current OTC alternatives, adding considerable unnecessary medical costs to the health care system. The following information is provided to validate the petition and medical rationale for the conversion of Zyrtec to OTC status:

- Of the 3.5 billion health problems treated annually, almost 2 billion, or 57%, are treated with OTC drugs as primary or major adjunctive therapy. The current restrictions limiting OTC access to antihistamine medications with a higher incidence of sedation and anticholinergic side effects is dangerous and costly.
- Americans are 4 times as likely to purchase an OTC medication then they are to consult a physician. Many patients can not afford the office visit associated with a physician's visit. The current restrictions precluding OTC access to antihistamine medications with a lower incidence of side effects predisposes many patients to dangerous antihistamine treatment options.
- Almost 60% of all dosage units consumed by patients are for OTC medications. The current restrictions precluding OTC access to antihistamine medications with a lower incidence of side effects limits many patients to dangerous antihistamine treatment options.

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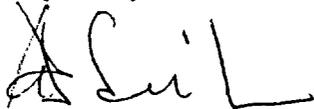
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- Over 500 medical conditions are treatable with one or more OTC medications as the primary therapy or major adjunctive therapy. These conditions occur millions of times each year (e.g. cold, allergy, and nasal congestion). The current restrictions precluding OTC access to Zyrtec, which has a lower incidence of side effects, predisposes many patients to dangerous antihistamine treatment options for the self treatment of many of these conditions.
- Requiring that a patient schedule an office visit to obtain safe medications such as Zyrtec is an undue time and financial burden to the patient. Additionally, requiring a prescription for these safe antihistamines trivializes the patient physician relationship.
- Zyrtec has been reviewed and approved by the Canadian and European equivalents to the FDA as direct to OTC approvals, bypassing the prescription requirement process.

Patients are seeking greater ownership of their health care and often prefer to self medicate when feasible. Of all the therapeutic classes of drugs available, the discrepancy in safety between the antihistamines available OTC compared to prescription Zyrtec is most pronounced. Based on the information provided above, it is logical that Zyrtec be immediately converted to OTC medication status.

Pfizer's direct to OTC approvals for Zyrtec in Canada and Europe are particularly relevant to my petition. At this point in the FDA review process, it is appropriate that the United States Food and Drug Administration have access to your New Drug Submissions in Canada and Europe for the OTC forms of Zyrtec. To help ensure a timely review of my petition, please expedite a summary of these documents to my attention within 30 days of your receipt of this letter.

Respectfully,



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CC: Douglas Schur, Esquire, WellPoint Health Networks
Andrea Masciale, Regulatory Policy Division, FDA