DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

DEC - 9 1998

TRANSMITTED VIA FACSIMILE

Nancy Konnerth
Manager, Regulatory Affairs
Berlex Laboratories, Inc.
340 Changebridge Road
P.O. Box 1000
Montville, NJ 07045-1000

RE: **NDA#** 20-860
Levlite (levonorgestrel and ethinyl estradiol) Tablets
MACMIS ID# 7357

Dear Ms. Konnerth:

As part of its routine monitoring and surveillance, the Division of Drug Marketing, Advertising, and Communications (DDMAC) has reviewed promotional materials for Levlite, submitted by Berlex Laboratories' (Berlex) on form FDA 2253, and has determined that these materials are false or misleading and in violation of the Federal Food, Drug, and Cosmetic Act and the regulations promulgated thereunder. These materials include a fact sheet (ID 98-130-0151L #5), a file card (ID 98-130-0060), and a visual aid (ID 98-130-0040).

Specifically, DDMAC has the following concerns:

Fact Sheet

1. Under the heading of "Benefits," the first bullet states that Levlite offers "high efficacy and the lowest available hormonal dose in a combination OC." This sentence is misleading because it implies that Levlite alone has the lowest hormonal dose when, in fact, the hormone levels in LEVLITE are no different than some other low dose oral contraceptives.

2. Under the heading of "Benefits," the fifth bullet states that 20 microgram pills may offer health benefits beyond contraceptive efficacy. This statement is misleading because it implies that 20 microgram pills are superior to other oral contraceptives in regulating the menstrual cycle, lessening cramps, and reducing the risk of certain forms of cancer when, in fact, these other health benefits are characteristic of all oral contraceptives.

3. Under the heading of "Benefits," the seventh bullet states that there is a "low potential for hormone-related side effects with Levlite." This statement is misleading because it implies that the side effect profile for Levlite is superior to other oral contraceptives without substantiation from adequate and well-controlled comparative trials. Also, this statement is lacking in fair balance because it does not state the common hormone-related side effects of Levlite. The balance information on the second page is remote from the claim and does not address the adverse reactions that would be potential hormone-related side effects of Levlite (for example, nausea, breast tenderness, and headaches). Thus, it is not adequate to substantiate such a claim.

File Card and Visual Aid

The claim that Levlite is "the lowest available hormonal dose in a combination OC" is false and misleading. The statement itself is false because Levlite is not *the* lowest low dose combination oral contraceptive. Furthermore, the contextual information given in the file card and visual aid (i.e., that it is compared to 30 microgram oral contraceptives) is not adequate to dispel the misleading impression, from headline and bullet, that Levlite is the only oral contraceptive that offers this low hormonal dose.

To address this issues, DDMAC requests that Berlex do the following:

- Immediately discontinue the use of this fact sheet and any other materials with the same or similar issues.

- Respond, in writing, with Berlex's intent to comply with DDMAC's requests by December 23, 1998. This response should include a list of all violative materials that Berlex intends to discontinue as well as Berlex's method to ensure that these materials and messages are terminated.

If you have any questions or comments, please contact the undersigned by facsimile at (301) 594-6771, or at the Food and Drug Administration, Division of Drug Marketing, Advertising and Communications, HFD-40, rm. 17B-20, 5600 Fishers Lane, Rockville, MD 20857. DDMAC reminds you that only written communications are considered official.

In all future correspondence regarding this matter, please refer to the MACMIS ID # 7357 in addition to the NDA number.

Sincerely,

Lisa L. Stockbridge, Ph.D.
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications