DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

JUN 1 1997

TRANSMITTED VIA FACSIMILE

Stephen Cristo
Assistant Director, Drug Regulatory Affairs
Pfizer Inc.
235 East 42nd Street
New York, NY 10017-5755

RE: NDA# 19-835
Zyrtec (cetirizine HCl) Tablets
MACMIS ID# 4619

Dear Mr. Cristo:

As part of its routine monitoring activities, the Division of Drug Marketing, Advertising, and Communications (DDMAC) has reviewed promotional materials for Zyrtec (cetirizine HCl) Tablets (e.g., detail aid CL050R97) and has determined that these materials contain comparative efficacy claims that are false, misleading, or otherwise lacking in fair balance and are therefore violative of the Federal Food, Drug, and Cosmetic Act and its implementing regulations. Furthermore, it appears that detail aid CL050R57 has not been submitted as required by 21 CFR 314.81(b)(3)(i) on FDA Form-2253.

The Zyrtec detail aid contains a presentation entitled "Excellent efficacy: Zyrtec and Atarax (hydroxyzine HCl)", with headline "Significant reduction of hives and pruritus" and displays two graphs "number of lesions" and "intensity of pruritus". The results of the Zyrtec vs Atarax vs placebo study are cited to Kalivas (Kalivas, Breneman, Tharp, et al. "Urticaria: clinical efficacy of cetirizine in comparison with hydroxyzine and placebo" J Allergy Clin Immunol. 1990;86:1014-1018) and Data on File. DDMAC considers the referenced comparative claims to be unsubstantiated and misleading because they have not been demonstrated by substantial evidence. Several study design issues are discussed below.

The presentation promotes an off-label use and is misleading because it uses data favorable to Zyrtec from patients treated with a dosage greater than that recommended in Zyrtec approved product labeling (i.e., 20 mg). In Kalivas, Zyrtec-treated patients were studied at 5 mg, 10 mg or 20 mg QD (average 10.4 mg), with 40% of patients being titrated up and maintained on 20 mg, outside of approved product labeling. In contrast, the recommended dose of Zyrtec is 5 or 10 mg, depending upon symptom severity.

Furthermore, the detail aid is misleading because the presentation of headline and graphs suggest equal efficacy between Zyrtec and Atarax and imply comparably effective doses were used. However, the Kalivas study design included comparisons between a maximum dose of Zyrtec (10 mg) to a minimum dose of Atarax (75 mg), with 65% of Atarax patients being dosed up and maintained to only the minimum recommended dosage of Atarax (25 mg TID or QID, 75 mg to 100 mg) for the indication of the management of pruritus due to allergic conditions such as chronic urticaria.

DDMAC requests that the distribution and use of these materials and similar promotional materials cease immediately. Pfizer's written response should be received by DDMAC no later than June 16, 1997, and should include a list of all similarly violative materials and a description of its method of discontinuing their use.

Please direct your response to 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 17-B-20, 5600 Fishers Lane, Rockville, MD 20857. DDMAC reminds Pfizer that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID #5232 in addition to the NDA number.

Sincerely,

Joan Hankin, JD
Regulatory Review Officer
Division of Drug Marketing,
Advertising, and Communications