

**LACHMAN CONSULTANT SERVICES, INC.**  
CONSULTANTS TO THE PHARMACEUTICAL AND ALLIED INDUSTRIES

1600 STEWART AVENUE, WESTBURY, NY 11590  
(516) 222-6222 • FAX (516) 683-1887

February 22, 2006

**OVERNIGHT COURIER 02/22/06**

Division of Dockets Management  
Food and Drug Administration (HFA-305)  
Department of Health and Human Services  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

0976 6 FEB 23 110:46

**Citizen Petition**

Dear Sir or Madam:

The undersigned submits this petition, in quadruplicate, pursuant to Section 505(j)(2)(C) of the Federal Food, Drug and Cosmetic Act, and in accordance with 21 CFR 10.30 on behalf of a client requesting the Commissioner of the Food and Drug Administration to declare that the drug product, Butalbital, 50 mg and Acetaminophen, 300 mg Tablets, is suitable for consideration in an abbreviated new drug application (ANDA).

**A. Action Requested**

The petitioner requests that the Commissioner of the Food and Drug Administration declare that Butalbital, 50 mg and Acetaminophen, 300 mg Tablets, is suitable for submission as an ANDA. The reference-listed drug product (RLD), upon which this petition is based, is Phrenilin® (Butalbital and Acetaminophen) 50 mg / 325 mg Tablets, ANDA 87-811, currently held by Valeant Pharmaceuticals International as designated in the Orange Book. Therefore, the petitioner seeks a change in strength of Acetaminophen components (from 325 mg to 300 mg), from that of the listed drug product.

**B. Statement of Grounds**

The Federal Food, Drug and Cosmetic Act provides for the submission of an Abbreviated New Drug Application for a drug product that differs in dosage strength from that of the listed drug provided the FDA has approved a petition that proposed filing such an application.

The RLD, Phrenilin® Tablets by Valeant is a tablet product containing 325 mg of Acetaminophen and 50 mg of Butalbital. See product listing for ANDA 87-811 from the electronic Orange Book also known as the Approved Drug Products with Therapeutic Equivalence Evaluations, accessed February 22, 2006, which lists the approval of the RLD (Attachment 1). The proposed drug product also represents a tablet dosage form, but containing 300 mg of Acetaminophen in combination with 50 mg Butalbital. The petition is thus seeking a change in strength of only the Acetaminophen component (from 325 mg to 300 mg) from that of the RLD. Please note that the proposed change in strength represents a dosage strength that is consistent with the dosing recommendations of the RLD's approved labeling.

2006P 0086

CP1

The current dosing instructions in the approved labeling of the RLD are as follows:

Phrenilin Dosage and Administration: "One or two tablets every four hours. Total daily dosage should not exceed 6 tablets daily."

Total Maximum Acetaminophen Exposure = 1.95 g/day well below the maximum 4 g permissible daily exposure level. The approved package insert for Phrenilin Tablets (butalbital 50 mg and acetaminophen 325 mg tablets) is included in Attachment 2.

The dosage for the proposed product (Attachment 3) is "One or two tablets every four hours as needed. Total daily dosage should not exceed 6 tablets." Total Maximum Acetaminophen Exposure = 1.80 g. This dosage is consistent with the dosage approved in the reference listed drug product's labeling.

In further support of approval of acetaminophen at a 300 mg dosage level, FDA has approved 300 mg as a safe and effective dose in other combination products, such as Acetaminophen and Codeine Phosphate Tablets, Acetaminophen and Hydrocodone Bitartrate Tablets, and Acetaminophen and Oxycodone Hydrochloride Tablets. Please see Attachment 4.

In summary, the proposed change in strength of the non-narcotic component from that of the reference-listed drug (i.e., a change of acetaminophen from 325 mg to 300 mg) will not raise questions of the safety or efficacy of the proposed product. The indication remains unchanged and the proposed dosing is consistent with that recommended in the labeling of the approved reference-listed drug product. Therefore, the Agency should conclude that clinical investigations are not necessary to demonstrate the proposed product's safety or effectiveness.

There are no proposed changes in labeling with the exception of the obvious changes in strength sought in this petition. The uses, indications, warnings and directions for use will remain the same as that of the RLD. Draft labeling for the proposed product is included in Attachment 2.

Therefore, the petitioner's request for the Commissioner to find that a change in strength from 325 mg to 300 mg of Acetaminophen in the proposed Butalbital and Acetaminophen Tablets, 50 mg / 300 mg, should raise no questions of safety or effectiveness, and the Agency should approve the petition.

#### **C. Environmental Impact**

The petitioner claims a categorical exclusion under 21 CFR 25.31.

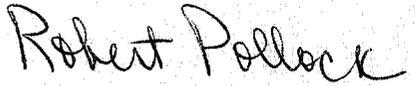
#### **D. Economic Impact**

The petitioner does not believe that this is applicable in this case, but will agree to provide such an analysis, if requested by the Agency.

**E. Certification**

The undersigned certifies, that to the best knowledge and belief of the undersigned, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioner, which are unfavorable to the petition.

Respectfully submitted,



Robert W. Pollock  
Senior Vice President



RWP/pk

Attachments:

1. Approved Drug Products with Therapeutic Equivalence Evaluations, Electronic Orange Book listing accessed February 22, 2006
2. Approved Labeling for reference-listed drug product (RLD), Phrenilin Tablets (Valeant), updated February 2003
3. Draft Insert Labeling Proposed for Butalbital, 50 mg and Acetaminophen, 300 mg Tablets
4. List of products approved in Electronic Orange Book with 300 mg dosage strength of Acetaminophen

cc: Arianne Camphire (OGD)

A43P6053