NDA 20-977
NDA 20-978

Glaxo Wellcome Inc.
Attention: Martha Anne A. Moore, R.Ph.
Antiviral Group- Regulatory Affairs
Five Moore Drive
Research Triangle Park, NC 27709

Dear Ms. Moore:

Please refer to your June 24, 1998, new drug applications, NDA 20-977 and NDA 20-978 submitted under section 505 (b) of the Federal Food, Drug, and Cosmetic Act for Ziagen™ (abacavir sulfate), 300mg Tablets and 20mg/mL Oral Solution.

We acknowledge receipt of your submissions dated:

March 27, 1998	September 15, 1998	October 20, 1998	December 1, 1998 (2)
April 15, 1998	October 1, 1998	October 28, 1998	December 3, 1998
April 28, 1998	October 2, 1998	October 29, 1998	December 4, 1998
May 18, 1998	October 8, 1998	October 30, 1998 (2)	December 10, 1998
June 3, 1998	October 9, 1998 (2)	November 4, 1998	December 14, 1998
July 10, 1998	October 12, 1998	November 9, 1998	December 15, 1998
August 7, 1998	October 13, 1998	November 10, 1998	December 16, 1998
August 28, 1998	October 15, 1998 (2)	November 12, 1998	December 17, 1998
August 31, 1998	October 16, 1998	November 13, 1998	

These new drug applications provide for the use of Ziagen (abacavir sulfate), in combination with other antiretroviral agents, for the treatment of HIV-1 infection.

We have completed the review of these applications, as amended, according to the regulations for accelerated approval, and have concluded that adequate information has been presented to approve Ziagen (abacavir sulfate) 300mg tablets and 20mg/mL oral solution for use as recommended in the draft label dated December 17**,** 1998. Accordingly, these applications are approved under 21 CFR 314 Subpart H. Approval is effective on the date of this letter. Marketing of these drug products and related activities are to be in accordance with the substance and procedures of the referenced accelerated approval regulations.

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert, text for the medication guide and text for the warning card). Marketing the product with FPL that is not identical to this draft labeling may render the product misbranded and an unapproved new drug.

Please submit sixteen copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount ten copies on heavy weight paper or similar material. For administrative purposes this submission should be designated "FINAL PRINTED LABELING" for approved NDA 20-977 and approved NDA 20-978. Approval of this submission by FDA is not required before the labeling is used.

Products approved under the accelerated approval regulations, 21 CFR 314.510, require further adequate and well-controlled studies to verify and describe clinical benefit. We remind you of your responsibility to conduct post-marketing studies under Subpart H as specified in your submission dated December 15, 1998, in which you agreed to submit the (b)(4)(CC)----------(b)(4)(CC)----------)--------Additionally, in response to comments raised at the November 2, 1998 Advisory Committee meeting regarding the adequacy of your tra(b)(4)(CC)----------age, we acknowledge your November 4, 1998, commitment to ---------- to support traditional approval of abacavir sulfate. We further acknowledge your submission of December 15, 1998, which confirms that (b)(4)(CC)---------- 1999 with the intention to initiate the study in the second quarter of 1999.

Final study reports should be submitted to this NDA as a supplemental application. For administrative purposes, all submissions relating to the Subpart H commitment must be clearly designated “Subpart H ”.

In addition, we note the following Phase 4 commitments, specified in your submission dated December 17, 1998. These commitments, along with any completion dates agreed upon, include:

(b) (4)(CC)----------

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In addition to the reports of studies conducted in support of traditional approval, GW agrees that the traditional approval package for Ziagen will include final reports of completed studies and reports of the status of ongoing studies for all trials referenced in the Phase 4 commitments numbers 1-7 above. Study results that become available before the traditional approval submission may be submitted individually, and the traditional approval package may incorporate by reference any complete study reports already submitted.

Protocols, data, and final reports should be submitted to your IND for this product and a copy of the cover letter sent to this NDA. If an IND is not required to meet your Phase 4 commitments, please submit protocols, data and final reports to this NDA as correspondence. In addition, under 21 CFR 314.81(b)(2)(vii), we request that you include a status summary of each commitment in your annual report to this NDA. The status summary should include the number of patients entered in each study, expected completion and submission dates, and any changes in plans since the last annual report. For administrative purposes, all submissions, including labeling supplements, relating to these Phase 4 commitments must be clearly designated "Phase 4 Commitments."

We also remind you that, under 21 CFR 314.550, after the initial 120 day period following this approval, you must submit all promotional materials, including promotional labeling as well as advertisements, at least 30 days prior to the intended time of dissemination of the labeling or initial publication of the advertisement.

Validation of the regulatory methods has not been completed. At present time, it is the policy of the Center not to withhold approval because the methods are being validated. Nevertheless, we expect your continued cooperation to resolve any deficiencies that may occur.
Please submit one market package of the drug when it is available.

We remind you that you must comply with the requirement for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, please contact Ms. Melissa M. Truffa, R.Ph., Regulatory Health Manager, at (301) 827-2335.

Sincerely yours,

M. Dianne Murphy, M.D.
Director
Office of Drug Evaluation IV
Center for Drug Evaluation and Research