NDA 21-088

ALZA Corporation
Attention: Janne Wissel
Senior Vice President, Operations
1900 Charleston Road
P. O. Box 7210
Mountain View, CA 94039-7210

Dear Ms. Wissel:

Please refer to your new drug application (NDA) dated April 30, 1999, received May 3, 1999, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Viadur™ (leuprolide acetate implant).

We acknowledge receipt of your submissions dated June 11, July 19, August 2, 13, 19, and 30, September 9 and 13, October 13 and 18, November 4, December 2, 9, and 23, 1999; January 7 and 26, February 7, 9, 10, 16 and 28, and March 1, 2000.

This new drug application provides for the use of Viadur™ (leuprolide acetate implant) for the palliative treatment of advanced prostate cancer.

We have completed the review of this application, as amended, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as recommended in the agreed upon labeling text. Accordingly, the application is approved effective on the date of this letter.

The final printed labeling (FPL) must be identical to the submitted draft labeling (package insert submitted February 28, 2000, patient package insert submitted February 28, 2000, immediate container and carton labels submitted February 28, 2000). Marketing the product with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

Please submit 20 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 of the copies on heavy-weight paper or similar material. For administrative purposes, this submission should be designated "FPL for approved NDA 21-088." Approval of this submission by FDA is not required before the labeling is used.

We remind you of your Phase 4 commitments specified in your submissions dated February 28 and March 1, 2000. These commitments are listed below:

1. **Biopharmaceutics Commitment:**
   ALZA Corporation commits to developing an accelerated in vitro release rate method that accounts for release of significantly greater than 10 mg of leuprolide in a time period similar to that in the current specification. ALZA will collect data from 25 commercial lots in order to show consistency in the method. The data and results will then be submitted for Agency review.

2. **Chemistry Commitment:**
   [ ]
   [ ]
   [ ]

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 314.82(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."

Validation of the regulatory methods has not been completed. At the 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 problems that may be identified.

Be advised that, as of April 1, 1999, all applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred (63 *FR* 66632). We are waiving the pediatric study requirement for this action on this application.
In addition, please submit three copies of the introductory promotional materials that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to this Division and two copies of both the promotional materials and the package insert directly to:

Division of Drug Marketing, Advertising, and Communications, HFD-40
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

Please submit one market package of the drug product when it is available.

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

If you have any questions, call Jeanine Best, MSN, RN, Regulatory Project Manager, at (301) 827-4260.

Sincerely,

Susan Allen, M.D., M.P.H.
Division of Reproductive and Urologic Drug Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research