DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-282

Adams Laboratories, Inc.
14801 Sovereign Road
Fort Worth, TX 76155-2645

Attention: D. Jeffrey Keyser
Vice President, Development & Regulatory Affairs

Dear Mr. Keyser:

Please refer to your new drug application (NDA) dated June 29, 2000, received June 29, 2000, submitted under section 505(b) pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Mucinex (guaifenesin) Extended-Release 600 mg Tablets.

We acknowledge receipt of your submissions dated August 2, September 14, November 8, and 10, 2000, and January 22, and 29, and May 11, June 25, August 29, September 7, October 19, November 30, 2001, and January 4, 7, and 11, and March 4, May 8, 13, 22, and 23, and June 28, and July 3, and 10, 2002.

The January 11, 2002, submission constituted a complete response to our December 20, 2001, action letter.

This new drug application provides for the use of Mucinex (guaifenesin) Extended-Release 600 mg Tablets as an expectorant for patients 12 years and above.

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

We completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the color mock-up carton and immediate container labels submitted June 28, 2002.

We remind you of your postmarketing commitment dated July 10, 2002. This commitment is listed below.

Chemistry, manufacturing, and controls commitment:

> In addition to the normal stability agreement to place the first three production batches on stabilit(b)(4)---m, Adams Laboratories, Inc. commits to perform (b)(4)----------studies on the ----------batches of the drug product for commercial production. This will include collection (b)(4)
>
> egularly
>
> ality assurance and manufacturing samples.

The (b)(4)----------studies are aimed to assure adequacy and consistency of the drug product manufacturing process controls and increase assurance of the drug product quality.

Upon completion, submit the data and statistical evaluation of the results as a "Supplement-Changes Being Effected in 0 Days". These reports are due on or before July 15, 2003.

Submit chemistry, manufacturing, and controls protocols and all study final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii), you should include a status summary of this commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission date, any changes in plans since the last annual report, and, for clinical studies, number of patients entered into each study. All submissions, including supplements, relating to these postmarketing study commitments must be prominently labeled "Postmarketing Study Protocol," "Postmarketing Study Final Report," or "Postmarketing Study Correspondence."

We also remind you of the following agreements discussed in your submissions dated May 8, 13, 22, and 23, 2002.

1. The extension of the approved expiry period may be attained only by submission and approval of a prior approval supplement. The following are the expiry periods approved for Mucinex (guaifenesin) Extended-Release 600 mg Tablets.

   - 600 mg 30 cc(b)(4)----------lets 12 month expiry
   - 600 mg 75 cc----------blets 24 month expiry
   - 600 mg 75 cc----------blets 24 month expiry
   - 600 mg 120 c---------- tablets 18 month expiry
   - 600 mg 625 c---------- tablets 18 month expiry

2. Implement Alert Limits for (b)(4)---- as additional in-process, and lot acceptance criteria controls as specified in amendment dated M(b)(, 2002, pages 4-424 to 4-426. Any lot with a release result that exceeds the Alert Limit (4)--- for 600 mg tablets) must be placed in a long-term stability testing program and subjected to enhanced stability testing and withdrawn from the market criteria, as specified in protocol PR02-11QC, page 14, of the amendment dated May 23, 2002.

In addition, we have the following comments.

1. Delete the word "NEW" from the principal display panel (PDP) for the 2-, 20-, and 40-count carton label of Mucinex (guaifenesin) Extended-Release 600 mg Tablets 6 months after approval.

2. Due to safety concerns associated with the size of Mucinex (guaifenesin) Extended-Release 600 mg Tablets, which could pose a choking hazard for young children, we ask you to include child-resistant packaging for all package sizes. We also ask you to include a conspicuous statement "This package for Households Without Young Children" on the principal display panel of the package sizes that will not have child-resistant packaging.

All applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens must contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred (21 CFR 314.55).

Based on the information submitted, we conclude the following:

For use as an expectorant:

- We are waiving the pediatric study requirement for this application for patients 0 through 12 years of age.

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to the Division of Pulmonary and Allergy Drug Products and one copy to the Division of Over-the Counter Drug Products.

We have not completed validation of the regulatory methods. However, we expect your continued cooperation to resolve any problems that may be identified.

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

In line with Center for Drug Evaluation and Research policy, oversight of this application is being transferred to the Division of Over-the-Counter Drug Products.

If you have any questions, call Ms. Ladan Jafari, Regulatory Project Manager at (301) 827-1084.

Sincerely,

{See appended electronic signature page}

Badrul Chowdhury, M.D., Ph.D.
Acting Director
Division of Pulmonary & Allergy Drug Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Charles Ganley, M.D.
Director
Division of Over the Counter Drug Products
Office of Drug Evaluation V
Center for Drug Evaluation & Research

Enclosure

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Badrul Chowdhury
7/12/02 03:44:27 PM

Linda Katz
7/12/02 03:49:12 PM
Linda M. Katz, M.D. signing for Charles J. Ganley, M.D.