DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-692/S-005
NDA 21-692/S-007

Biovail Laboratories International SRL
(c/o) Keller and Heckman, LLP
1001 G Street, N.W.,
Suite 500 West
Washington, DC 20001

Attention: John Dubeck, US Agent

Dear Mr. Dubeck:

Please refer to your supplemental new drug applications dated September 29, 2006 (S-005), received October 3, 2006, and October 13, 2006 (S-007), received October 16, 2006, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Ultram ER Extended-Release Tablets 100-mg, 200-mg and 300-mg.

We acknowledge receipt of your submissions dated March 22, 2007 (S-007) and January 2, 2008 (S-005, S-007).

This "Changes Being Effected" supplemental new drug application (S-005) provides for changes in accordance with 21 CFR 314.70 (c)(6)(iii)(A) in the Prescribing Information to correct the Adverse Event information. Additionally editorial changes and clarifications regarding the delivery system of the drug product have been included. The revised labeling includes proposed changes to DESCRIPTION, DRUG ABUSE AND ADDICTION, PRECAUTIONS, ADVERSE REACTIONS and HOW SUPPLIED sections.

This "Prior Approval" supplemental drug application (S-007) provides for changes in accordance with 21 CFR 314.70 (b)(2)(v)(A) in the Prescribing Information to add dosing instructions for patients being switched from Ultram (immediate-release formulation of tramadol) to Ultram ER. This labeling change seeks to provide the physician guidance on dosing those patients, who are being switched from Ultram (IR) to Ultram ER therapy. The revised labeling includes proposed changes to DOSAGE AND ADMINISTRATION and HOW SUPPLIED sections.

CONTENT OF LABELING

We have completed our review of these applications, as amended and they are approved, effective on the date of this letter, for use as recommended in the enclosed content of labeling [21 CFR 314.50(1)] in structured product labeling (SPL) format submitted on January 2, 2008. We will transmit this version to the National Library of Medicine for public dissemination.

LETTERS TO HEALTH CARE PROFESSIONALS

If you issue a letter communicating important information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH
Food and Drug Administration
5515 Security Lane
HFD-001, Suite 5100
Rockville, MD 20852

REPORTING REQUIREMENTS

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 Kathleen Davies, Regulatory Project Manager, at (301) 796-2205.

Sincerely,

{See appended electronic signature page}

Bob Rappaport, M.D.
Director
Division of Anesthesia, Analgesia
and Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

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

/s/

Sharon Hertz
2/20/2008 03:53:53 PM
Signing for Bob Rappaport, M.D.