DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-817

Novartis Pharmaceuticals Corporation
Attention: Lynn Mellor
Director, Drug Regulatory Affairs
One Health Plaza
East Hanover, NJ 07936-1080

Dear Ms Mellor:

Please refer to your new drug application (NDA) dated and received September 21, 2004, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Reclast (zoledronic acid) Injection.

We also acknowledge receipt of you submissions dated October 13, 2006, and April 13, 2007. The October 13, 2006 submission constituted a complete response to our February 22, 2006 action letter.

This new drug application provides for the use of Reclast (zoledronic acid) Injection for the treatment of Paget's disease of bone.

We have completed the review of this application, as amended. It is approved effective on the date of this letter, for use as recommended in the agreed-upon labeling text.

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert, patient package insert carton and container labels submitted April 13, 2007).

Please submit an electronic version of the FPL according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format – NDA*. For administrative purposes, designate this submission "**FPL for approved NDA 21-817**." Approval of this submission by FDA is not required before the labeling is used.

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. We are waiving the pediatric study requirement for this application.

We remind you of your postmarketing study commitment in your submission dated April 13, 2007. This commitment is listed below.

1. You agreed to perform a registry study to determine the incidence of hypocalcemia post Reclast treatment in patients with Paget's Disease.

Protocol Submission:	by September 30, 2007
Study Start:	by March 31, 2008
Final Report Submission:	by September 30, 2010

Submit clinical protocols to your IND for this product. Submit nonclinical and 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 each commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission dates, 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 Commitment Protocol", "Postmarketing Study Commitment Final Report", or "Postmarketing Study Commitment Correspondence."

We also note in your April 13, 2007 letter that you will submit expedited reports of all hypocalcaemia adverse events for the first 2 year post-launch, and a detailed analysis of hypocalcemia adverse events in the US Periodic Report. Further, you agreed to implement physician and patient education initiatives. In addition, we note that you agreed to submit results from your Reclast safety database of medication errors that occur in the United States for two years following the date of approval on a quarterly basis. This data will be included in the US Periodic Report.

Further, submit three copies of the introductory promotional materials that you propose to use for these products. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this Division and two copies of both the promotional materials and the package inserts directly to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705-1266

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 Randy Hedin, R.Ph., Senior Regulatory Management Officer, at (301) 796-1224.

Sincerely,

{See appended electronic signature page}

Mary H. Parks, M.D.
Director
Division of Metabolism and Endocrinology 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/

Eric Colman

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Eric Colman for Mary Parks