DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 022159/S-011

SUPPLEMENT APPROVAL
POSTMARKETING REQUIREMENT FULFILLED

Septodent Holding SAS
c/o Arent Fox LLP
1717 K Street, NW
Washington, DC 20006-5344

Attention: Wayne H. Matelski, Esquire

Dear Mr. Matelski:

Please refer to your Supplemental New Drug Application (sNDA) dated May 19, 2015, received May 19, 2015, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for OraVerse ® Injection (phentolamine mesylate) solution 0.4 mg.

This "Prior Approval" supplemental new drug application proposes revisions to the Package Insert to include the results of the pediatric study required to fulfill the PREA Post-marketing requirement listed in the approval letter dated May 9, 2008.

APPROVAL & LABELING

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

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Content of labeling must be identical to the enclosed labeling (text for the package insert) with the addition of any labeling changes in pending "Changes Being Effected" (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

Information on submitting SPL files using eList may be found in the guidance for industry titled "SPL Standard for Content of Labeling Technical Qs and As at http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that includes labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

FULFILLMENT OF POSTMARKETING REQUIREMENT

We have received your submission dated May 19, 2015, reporting on the following postmarketing requirement listed in the March 17, 2016, postapproval postmarketing requirement letter.

714-2 Assessment of efficacy and safety of OraVerse in patients from 3-6 years of age. This study should be a randomized, sham-injection controlled, double-blinded study comparing the times to return of normal sensation and normal function following the injection OraVerse or a sham injection administered to patients undergoing dental procedures requiring the administration of a local anesthetic agent combined with a vasoconstrictor. Specifically, the following clinical endpoints should be assessed using validated metrics: a. Time to return of normal sensation of the lip and, where applicable, the tongue. b. Time to return of normal function for speech, smiling, drinking, eating and not drooling. Safety assessments should include heart rate, blood pressure, oral cavity examinations, assessments for nerve injury, and adverse events. The study should include a minimum of 100 subjects uniformly distributed by age and evenly distributed by treatment within 1-year age groups.

We have reviewed your submission and conclude that the above requirement was fulfilled.

This completes all of your postmarketing requirements acknowledged in our May 9, 2008, letter.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory

comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) to:

OPDP Regulatory Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion (OPDP)
5901-B Ammendale Road
Beltsville, MD 20705-1266

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at: http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf).

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf. Information and Instructions for completing the form can be found at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

REPORTING REQUIREMENTS

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

If you have any questions, call Christopher Hilfiger, Regulatory Project Manager, at (301) 796-4131.

Sincerely,

{See appended electronic signature page}

Rigoberto Roca, MD
Deputy Division Director
Division of Anesthesia, Analgesia, and
Addiction Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURE(S):
Content of Labeling

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

/s/

RIGOBERTO A ROCA
03/18/2016