DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

TRANSMITTED VIA FACSIMILE

SEP - 2 1997

Richard W. Tkach, JD
Associate Director, Marketed Products Support
Worldwide Regulatory Affairs
Key Pharmaceuticals, Inc.
2000 Galloping Hill Road
Kenilworth, NJ 07033

RE: **NDA# 20-225**
Imdur (isosorbide mononitrate) Extended Release Tablets
MACMIS ID# 5765

Dear Mr. Tkach:

As part of its routine monitoring program, the Division of Drug Marketing, Advertising and Communications (DDMAC) has become aware of promotional materials for Imdur (isosorbide mononitrate) extended release tablets by Key Pharmaceuticals, Inc. (Key) that violate the Federal Food, Drug and Cosmetic Act and its regulations. Reference is made to the following brochures submitted under cover of Form FDA 2253: IM0700B, submitted June 12, 1997; IM0752A, submitted July 15, 1997; and IM0693B, submitted July 28, 1997. DDMAC has reviewed these brochures for Imdur and has determined that they promote Imdur in a manner which is considered false and/or misleading because they are lacking in fair balance, or otherwise misleading.

Promotional materials must present information about the risks associated with the use of the drug in a manner reasonably comparable to that of claims concerning the drug's efficacy. The brochures listed above provide risk information in small type size at the bottom of the last page of the brochures. Presentation of risk information in this manner is not sufficient to provide prominence and readability comparable with the presentation of information relating to effectiveness of the drug. Therefore, these promotional pieces are lacking in fair balance, or otherwise misleading.

Furthermore, in brochure IM0700B, Key makes the claim that "efficacy remained consistent throughout the final day of the study, proving the long-term avoidance of tolerance." Although this has been demonstrated for the 120 mg and 240 mg doses, the claim is misleading by omission, since it suggests that Imdur was effective on the final day of the trial for all dosages. However, by the final day of the trial, the effectiveness of the 30 mg and 60 mg doses were not differentiable from placebo. Thus, DDMAC considers this claim to be false

and/or misleading because it selectively presents information to suggest that Imdur is more effective than demonstrated in clinical trials.

Key should immediately cease distribution of these and other similar promotional materials for Imdur that contain the same or similar claims or presentations. Key should submit a written response to DDMAC on or before September 16, 1997, describing its intent and plans to comply with the above.

Key should direct its response to the undersigned by facsimile at (301) 594-6771, or at the Food and Drug Administration, Division of Drug Marketing, Advertising and Communications, HFD-40, Rm 17B-20, 5600 Fishers Lane, Rockville, MD 20857. DDMAC reminds Key that only written communications are considered official.

In all future correspondence regarding this particular matter please refer to MACMIS ID #5765 in addition to the NDA number.

Sincerely,

Janet Norden, MSN, RN
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications