DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

FOI

APR 8 1998

TRANSMITTED VIA FACSIMILE

Ms. Michelle Wallace
Senior Regulatory Analyst
North American Regulatory Affairs
Hoechst Marion Roussel, Inc.
10236 Marion Park Drive
P.O. Box 9707
Kansas City, MO 64134-0707

RE: NDA# 20-625
Allegra (fexofenadine hydrochloride) Capsules 60 mg
MACMIS ID# 6475

Dear Ms. Wallace:

This letter from the Division of Drug Marketing, Advertising, and Communications (DDMAC) concerns promotional materials by Hoechst Marion Roussel, Inc, (HMR) for Allegra (fexofenadine HCl) Capsules (e.g., a Spring 1998 Allegra detail aid "Share the Freedom" (50016003/97332702/3256T7). DDMAC has determined that these promotional materials contain unsubstantiated implied clinical superiority claims and are therefore violative the Federal Food, Drug, and Cosmetic Act and its implementing regulations.

Presentation of Comparative Pharmacodynamic Data to Suggest Clinical Superiority

On pages four and five of the detail aid, a section entitled "Pharmacodynamic Activity" presents graphical differences in pharmacodynamic data for Allegra, Claritin (loratadine) Tablets, and placebo, based on wheal and flare suppression data. These comparative graphs are accompanied by the statement "Allegra produced significantly greater suppression of wheal areas than loratadine (P=0.0001) calculated as peak percent reduction from baseline."

The wheal and flare *in vivo* test demonstrates pharmacodynamic activity (i.e., inhibition of the skin's wheal and flare response of an epicutaneous injection of histamine in normal volunteers rather than clinical effect in patients suffering from seasonal allergies). The presentations of these comparative pharmacodynamic data are misleading because they suggest or imply clinical significance, including clinical superiority, based on these pharmacologic effects when no such clinical relevance has been demonstrated by substantial evidence (i.e., adequate and well-

controlled clinical studies). In the absence of adequate comparative clinical data, the pharmacodynamic presentations are misleading and disclaimers would not remedy these misleading messages.

In addition, the detail aid includes a comparative presentation that falsely or misleadingly suggests that Allegra has greater efficacy than Claritin. On page eight under the heading "Share the Advantages" is the statement "Demonstrated Efficacy At Both Peak and Trough Plasma Levels", with a "Yes" marked for Allegra and a "No" marked for Claritin. This characterization of Claritin is false because Claritin is approved as an efficacious once-a-day product, and this comparative pharmacodynamic presentation is misleading because it suggests Allegra's clinical superiority over Claritin when no such clinical relevance has been demonstrated by substantial evidence.

DDMAC requests that the distribution and use of Allegra promotional materials containing these and similar misleading comparative presentations cease immediately. DDMAC requests that HMR's written response be received by DDMAC no later than April 22, 1998 and should include a list of all violative materials and a description of its method of discontinuing their use.

Please direct your response to the undersigned at the Food and Drug Administration, Division of Drug Marketing, Advertising and Communications, HFD-40, Rm 17-B-20, 5600 Fishers Lane, Rockville, MD 20857. DDMAC reminds HMR that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID #6475 in addition to the NDA number.

Sincerely,

Joan Hankin, JD
Regulatory Review Officer
Division of Drug Marketing,
Advertising, and Communications