DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

TRANSMITTED VIA FACSIMILE

JUN 29 1998

Richard J. Hill, Jr., R.Ph.
Assistant Director
Promotional Compliance
Bristol-Myers Squibb Company
P.O. Box 4550
Princeton, NJ 08543-3400

RE: **NDA # 50-679**
Maxipime (cefepime hydrochloride) for injection
MACMIS ID # 6696

Dear Mr. Hill:

The Division of Drug Marketing, Advertising and Communications (DDMAC), as part of its routine monitoring and surveillance program, has reviewed materials that are used to promote Bristol-Myers Squibb Company's (BMS) product, Maxipime IV/IM (Maxipime). These materials included a convention panel (E4E007) submitted on FDA Form 2253. DDMAC finds the dissemination of this promotional piece to be in violation of the Federal Food, Drug, and Cosmetic Act and the applicable regulations.

Specifically, DDMAC objects to the following:

Indication

"First and Only cephalosporin indicated for empiric treatment of febrile neutropenia"

The presentation of the above portion of the indication for Maxipime would be misleading because it has been bifurcated from an important part of the indication that relates to the limitation of Maxipime in the referenced indication. Specifically, the above statement appears in bold, black letters on a red background. Conversely, the rest of the indication that states, "In patients at high risk for severe infection (including patients with a history of recent bone marrow transplantation, with hypotension at presentation, with an underlying hematologic malignancy, or

with severe or prolonged neutropenia), antimicrobial monotherapy may not be appropriate. Insufficient data exist to support the efficacy of cefepime monotherapy in such patients," is presented as a footnote. The presentation of this information as a footnote, fails to convey its importance. This information is an integral part of the indication in the approved product labeling (PI), and should be prominently presented.

Presentation of Risk Information

The convention panel is lacking in fair balance because the risk information is not presented in a manner that is reasonably comparable to the presentation of promotional claims for Maxipime. Promotional materials must present information relating to contraindications, warnings, precautions, and adverse effects with a prominence and readability reasonable comparable with the presentation of information relating to the efficacy of the drug. The convention panel depicts promotional claims for Maxipime in bold, black and white lettering on a red background. In contrast, Maxipime's risk information is presented as a footnote in very small, black lettering on a red background. This presentation makes the indication and risk information nearly impossible to notice and read.

Further, the convention panel is misleading because it fails to include adequate risk information associated with the use of Maxipime. Specifically, the convention panel contains the contraindications for Maxipime, but fails to include the most common adverse events associated with the use of this drug. The most common adverse events associated with the use of Maxipime include local reactions (3%), including phlebitis (1.3%), rash (1.1%), and pain and / or inflammation (0.6%).

In order to address this violation, DDMAC recommends that BMS take the following actions:

1. Immediately discontinue the use of the aforementioned material and any other promotional materials for Maxipime that contain the same or similar presentations;

2. Provide a written response to DDMAC of your intent to comply with the above request, and a list of promotional materials containing the misleading presentations that will be discontinued.

BMS's response should be received no later than 10 business days from the issue date of this letter. If BMS has any questions or comments, please contact 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 BMS that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID # 6696 in addition to the NDA number.

Sincerely,

Jo Ann Spearmon, M.P.A., Pharm.D.
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications