DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

FOI

Food and Drug Administration
Rockville MD 20857

APR 28 1997

TRANSMITTED VIA FACSIMILE

Stephen Cristo
Assistant Director, Drug Regulatory Affairs
Pfizer Inc.
235 East 42nd Street
New York, NY 10017-5755

RE: NDA# 19-835
Zyrtec (cetirizine HCl) Tablets
MACMIS ID# 4619

Dear Mr. Cristo:

As part of its routine monitoring activities, the Division of Drug Marketing, Advertising, and Communications (DDMAC) has reviewed promotional materials for Zyrtec (cetirizine HCl) Tablets (e.g., detail aid CD165V96, journal ad CD148A96, and poster CL103Q97B) and has determined that these materials contain unsubstantiated and misleading comparative efficacy claims that are violative of the Federal Food, Drug, and Cosmetic Act and its implementing regulations.

These Zyrtec promotional materials contain broad comparative efficacy claims as well as onset-of-action claims that favor Zyrtec over Claritin (loratadine) Tablets. These Zyrtec superiority claims are alleged to be supported by a two-day outdoor park study and/or a two-day controlled environment study (see below).

1) Outdoor park study
Meltzer, Weller, Widlitz, "Comparative outdoor study of the efficacy, onset and duration of action, and safety of cetirizine, loratadine, and placebo for seasonal allergic rhinitis", J. Allergy Clin Immunol., 1996; 97: 617-626.

claims: excellent efficacy in SAR; Headlines to comparative graphs: effective relief; fast acting, effective relief

2) Controlled environmental exposure unit study
Data on File L-0323, "Comparison of efficacy, onset and duration of action of cetirizine vs loratadine and placebo in controlling seasonal allergic rhinitis symptoms occurring in subjects exposed to ragweed pollen in environmental exposure unit"

claims: excellent efficacy in SAR, effective relief; rapid relief, relieved symptoms rapidly,
Headlines to comparative graphs: excellent improvement in major symptom severity, significant relief beginning at 1 hour

DDMAC, in consultation with the Division of Pulmonary Drug Products (DPDP), has determined that the superior (i.e., earlier) onset-of-action claims for Zyrtec over Claritin appear to be substantiated by the two-day outdoor park study in conjunction with the two-day controlled environment study.

However, the above-referenced Zyrtec sub/headlines, combined with the graphical presentation of results of these two-day studies, are misleading and lack fair balance because they suggest overall superior efficacy (i.e., superiority at all times through the end of the study period) for Zyrtec over Claritin that has not been adequately demonstrated by these short-duration (two-day) clinical studies. Such a superior efficacy claim is misleading because it suggests a more general clinical experience than the two-day study methodology and data support. The antihistamines Claritin and Zyrtec were approved for seasonal allergic rhinitis treatment based on clinical efficacy that was demonstrated during two-week seasonal allergic rhinitis trials. Any broad or overall superior efficacy claim for Zyrtec over Claritin based on two-day comparative studies is unsubstantiated because superior efficacy has not been demonstrated by substantial evidence (i.e., adequate and well-controlled studies).

DDMAC requests that the distribution and use of these materials and similar promotional materials cease immediately. Pfizer's written response should be received by DDMAC no later than May 12, 1997, and should include a list of all similarly violative materials and a description of its method of discontinuing their use.

Please direct your 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 17-B-20, 5600 Fishers Lane, Rockville, MD 20857. DDMAC reminds Pfizer that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID #4619 in addition to the NDA number.

Sincerely,

Joan Hankin

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

File Name: zyrtec\2cfstudy.nov

Consult:	KWONG	Date: 10/3/96
Drafted:	HANKIN	Date: 10/7/96
Comment:	ABRAMS	Date: 10/8/96
Comment:	DREZIN	Date: 4/18/97
Revised:	HANKIN	Date: 4/21/97
Comment:	ABRAMS	Date: 4/22/97
Revised:	HANKIN	Date: 4/24/97
Concur:	ABRAMS	Date: 4/25/97

CC:
HFD-40/NDA #19-835
HFD-40/Chron/HANKIN(2)/ABRAMS
HFD-570/KWONG/HONIG/JENKINS
HFD-570/NDA #19-835

MACMIS ID # 4619

MACMIS Type Code: LETT
MACMIS Action Code: VIOL

2253 ID#: 42734 Material ID#(s):CD165V96 and CD148A96

2253 ID#: 51404 Material ID#: CL103Q97B

Due Date: May 12, 1997

Close Out: N

FOI STATUS: RELEASABLE