



01P-0186/CP1

Food and Drug Administration  
Rockville MD 20857

AUG 20 2001

Amall Golden Gregory, LLP  
Attention: Alan G. Minsk  
2800 One Atlantic Center  
1201 West Peachtree Street  
Atlanta, GA 30309-3450

Docket No. 01P-0186/CP1

Dear Mr. Minsk:

This is in response to your petition filed on April 16, 2001, requesting permission to file an Abbreviated New Drug Application (ANDA) for the following drug product: Propoxyphene Napsylate and Acetaminophen Tablets USP, 100 mg/325 mg. The reference listed drug product to which you refer in your petition is Darvocet-N® 100 (Propoxyphene Napsylate and Acetaminophen Tablets USP 100 mg/650 mg) approved under NDA 17-122 held by Eli Lilly and Co.

Your request involves a change in strength in the acetaminophen component from that of the listed drug product (i.e., from 650 mg to 325 mg). The change you request is the type of change that is authorized under the Federal Food, Drug, and Cosmetic Act (Act).

We have reviewed your petition under Section 505(j)(2)(C) of the Act and have determined that it is approved. This letter represents the Agency's determination that an ANDA may be submitted for the above-referenced drug product.

Under Section 505(j)(2)(C)(i) of the Act, the Agency must approve a petition seeking a strength that differs from the strength of the listed drug product unless it finds that investigations must be conducted to show the safety and effectiveness of the differing strength.

The Agency finds that the change in strength for the specific proposed drug product does not pose questions of safety or effectiveness because the uses and route of administration of the proposed drug product are the same as that of the listed drug product. In addition, when an ANDA is submitted for your proposed drug product, the proposed labeling should reflect the maximum number of tablets per day that can be administered. The total daily dose of the acetaminophen component should not exceed the maximum total daily dose for adults of 4000 mg established by the Agency for its safe and effective range and a single dose of acetaminophen should not exceed 1000 mg. Please refer to the Tentative Final Monograph for

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Internal Analgesic, Antipyretic, and Antirheumatic Drug Products for Over-the-Counter Human Use (53 FR 46204, November 16, 1988) for information regarding acetaminophen. The total daily dose of the propoxyphene napsylate component should not exceed 600 mg per day.

The Agency concludes, therefore, that investigations are not necessary in this instance. In addition, if shown to meet bioavailability requirements, the proposed drug product can be expected to have the same therapeutic effect as the listed reference drug product.

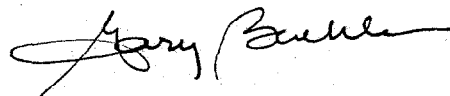
The approval of this petition to allow an ANDA to be submitted for the above-referenced drug product does not mean that the Agency has determined that an ANDA will be approved for the drug product. The determination of whether an ANDA will be approved is not made until the ANDA itself is submitted and reviewed by the Agency.

To permit review of your ANDA submission, you must submit all information required under Sections 505(j)(2)(A) and (B) of the Act. To be approved, the drug product will, among other things, be required to meet current bioavailability requirements under Section 505(j)(2)(A)(iv) of the Act. We suggest that you submit your protocol for this drug product to the Office of Generic Drugs, Division of Bioequivalence prior to the submission of your ANDA. During the review of your application, the Agency may require the submission of additional information.

The listed drug product to which you refer in your ANDA must be the one upon which you based this petition. In addition, you should refer in your ANDA to the appropriate petition docket number cited above, and include a copy of this letter in the ANDA submission.

A copy of this letter approving your petition will be placed on public display in the Dockets Management Branch, Room 1061, Mail Stop HFA-305, 5630 Fishers Lane, Rockville, MD 20852.

Sincerely yours,



Gary J. Buehler  
Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research