DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

TRANSMITTED VIA FACSIMILE

Robert J. Mandetta
Associate Director, Regulatory Affairs
Knoll Pharmaceutical Company
3000 Continental Drive-North
Mount Olive, NJ 20728

JAN 28 2000

RE: Synthroid (levothyroxine sodium) Tablets
MACMIS ID# 8601

Dear Mr. Mandetta:

Through routine monitoring and surveillance, the Division of Drug Marketing, Advertising, and Communications (DDMAC) has reviewed a note pad being distributed by Knoll representatives to physicians. The pages of the note pad show a background of Synthroid tablets in each of the available potencies; a header of "The Measure of Excellence" and "Synthroid (Levothyroxine Sodium Tablets, USP)"; and a footer of "The Trusted Standard in Thyroid Hormone Replacement." DDMAC has reviewed the material and has determined that it is in violation of the Federal Food, Drug, and Cosmetic Act and its implementing regulations. Specifically, DDMAC objects to the piece for the following reasons:

1. The labeling of Synthroid contains a boxed warning relating to a serious risk associated with the use of the drug product. Therefore, reminder advertisements for Synthroid are not permitted. To satisfy the requirement for fair balance, each page would require a presentation of risk information with a prominence and readability reasonably comparable to the information relating to effectiveness.

2. The header and footer of each page suggests an unsupported superiority claim. Unsubstantiated superiority claims are not permitted.

3. Use of the term "standard" is misleading given the current status of levothyroxine sodium products. Neither Synthroid nor any other levothyroxine sodium products have been approved or recognized as a standard in thyroid hormone replacement. For further information about the status of these products, we refer you to 62 Fed. Reg. 43535-38 (August 14, 1997) (Prescription Drug Products; Levothyroxine Sodium).

To address this issue, Knoll should immediately discontinue the dissemination of this and all other promotional materials that contain the same or similar violations. Knoll should respond to this letter with a list of all similarly violative promotional materials and your proposed method for discontinuing their use. Your response should be received by this office no later than ten days from the receipt of this letter. It should be directed to the undersigned by facsimile at (301) 594-6771, or at the Food and Drug Administration, Division of Drug Marketing, Advertising, and Communications, HFD-42, Rm. 17B-20, 5600 Fishers Lane, Rockville, MD 20857. DDMAC reminds you that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID #8601.

Sincerely,

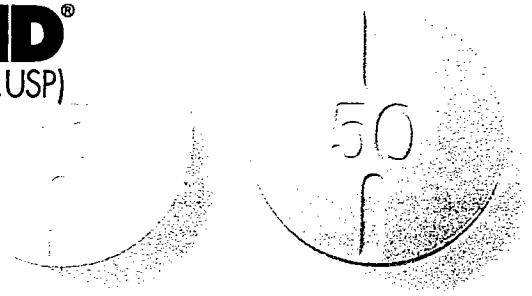
/S/

Margaret M. Kober, R.Ph.
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications

The Measure of Excellence

SYNTHROID®

(Levothyroxine Sodium Tablets, USP)



The Trusted Standard in Thyroid Hormone Replacement

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Robert J. Mandetta
Associate Director, Regulatory Affairs
Knoll Pharmaceutical Company
3000 Continental Drive-North
Mount Olive, NJ 07828

FEB 25 2000

RE: Synthroid (levothyroxine sodium) Tablets
MACMIS ID# 8601

Dear Mr. Mandetta:

Reference is made to an untitled letter from the Division of Drug Marketing, Advertising, and Communications (DDMAC) to Knoll Pharmaceutical Company (Knoll) dated January 28, 2000 regarding the violative dissemination of a notepad featuring Synthroid. Reference is also made to Knoll's response dated February 7, 2000 and to an untitled letter from DDMAC dated August 1, 1997, regarding similar issues and Knoll's response dated September 18, 1997.

Our 1997 letter to Knoll addressed issues raised in two journal advertisements, but also stated "Knoll should immediately discontinue these advertisements *and all other promotional materials that contain similar issues or themes*" (emphasis added). DDMAC also requested a list of all materials that had been discontinued.

Knoll provided this list on September 18, 1997. The notepad that was the subject of our January 28, 2000 letter does not appear on this list. Your letter of February 7, 2000, indicated that dissemination of the notepad was discontinued in 1997 along with the other violative materials. Please advise DDMAC if there are additional materials which have been discontinued, but which were also left off the original list.

Knoll should respond to this letter within ten days of the receipt of this letter. Your response should be directed to the undersigned by facsimile at (301) 594-6771, or at the Food and Drug Administration, Division of Drug Marketing, Advertising, and Communications, HFD-42, Rm. 17B-20, 5600 Fishers Lane, Rockville, MD 20857. DDMAC reminds you that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID #8601.

Sincerely,

/S/

Margaret M. Kober, R.Ph.
Regulatory Review Officer
Division of Drug Marketing,
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