

MAR 31 1997

TRANSMITTED VIA FACSIMILE

Ross J. Dileo
Director, Regulatory Affairs
Oclassen Pharmaceuticals, Inc.
100 Pelican Way
San Rafael, California 94901

**RE: NDA # 50-641
Monodox (doxycycline monohydrate) 100mg Capsule
MACMIS ID #5191**

Dear Mr. Dileo:

The Division of Drug Marketing, Advertising and communications (DDMAC), as part of its routine monitoring and surveillance program, has reviewed materials that promotes Oclassen Pharmaceuticals, Inc. (Oclassen) product, Monodox, and finds these materials to be in violation of the Federal Food, Drug, and Cosmetic Act and the applicable regulations. These materials include a Dear Doctor letter, F1004/1, and the labeling for professional samples of Monodox.

Specifically, DDMAC objects to the following:

• **Claims That Misrepresent The Approved Indication(s)**

The Dear Doctor letter and the labeling for professional samples of Monodox violate the Act and regulations because they do not adequately describe the indication for Monodox. As Oclassen is aware, labeling and advertising must be consistent with the approved product labeling. The approved product labeling for Monodox states that in severe acne, doxycycline may be a useful adjunctive therapy. Therefore, all labeling and advertising that promote the use of Monodox for the treatment of acne should be limited to promoting its use as adjunctive therapy in the treatment of acne.

• **Comparative Safety Claims**

Selective presentation of information, from any source, in a way that makes a drug appear to be safer than has been demonstrated in head to head comparative clinical trials, is false or misleading or otherwise in violation of the Act. The Dear Doctor letter implies a better central nervous system

(CNS) side effect profile for Monodox than with minocycline, i.e. headaches and vertigo. Both Monodox and minocycline cause benign intracranial hypertension in adults, which has a clinical manifestation of headache. Therefore, this side effect is applicable to both products, and should not be listed as a side effect for minocycline and not for Monodox. Thus, the presentation of information about CNS effects, in the Dear Doctor letter, is misleading, and therefore, in violation of the Act and regulations, because it does not adequately provide appropriate side effect information.

Cost Claims

The Dear Doctor letter is misleading because it fails to give adequate information used as the basis for the claim that "Monodox is much less expensive than the leading brand of minocycline and comparable in price to generic minocycline." In the absence of such information, this claim is false and misleading.

In order to address these objections, DDMAC recommends that Oclassen take the following actions:

1. Immediately discontinue the use of the above promotional materials, and any other promotional materials for Monodox that contain the same or similar claims.
2. Provide to DDMAC, in writing, Oclassen's intent to comply with number one above.

Oclassen's response should be received by April 11, 1997. If Oclassen has any questions or comments, please contact the undersigned by facsimile at (301) 594-6771, or in writing at DDMAC, HFD-40, Room 17B-20, 5600 Fishers Lane, Rockville, MD 20857.

Ross J. Dileo
Oclassen Pharmaceuticals, Inc.
NDA # 50-641

3

In all correspondence related to this matter, please refer to MACMIS ID # 5191 in addition to the NDA number.

Sincerely,

A handwritten signature in black ink, appearing to read "Jo Ann Spearmon", with a long horizontal flourish extending to the right.

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

Ross J. Dileo
Oclassen Pharmaceuticals, Inc.
NDA # 50-641

4

File Name: wpfiles/spearmon/novmono

Drafted: spearmon Date: 2/15/97
Comment: fleischer Date: 2/15/97
Revised: spearmon Date: 3/27/97
Concur: palmer Date: 3/14/97

CC:
HFD-40/NDA # 50-641
HFD-40/Chron/spearmon/palmer
MACMIS ID # 5191

MACMIS Type Code: LETT
MACMIS Action Code: VIOL
2253 ID#: Material ID#(s):
2253 ID#: Material ID#(s):

Due Date:
Close Out: Y

Foi Status: releasable