



TRANSMITTED BY FACSIMILE

Kerry Rothschild, JD
Director, Regulatory Affairs
Aventis Pharmaceuticals
200 Crossing Blvd
PO Box 6890
Bridgewater, NJ 08807-0890

RE: NDA #20-872
Allegra® (fexofenadine HCl) Tablets
MACMIS ID #11481

Dear Mr. Rothschild:

This letter notifies Aventis Pharmaceuticals, Inc. (Aventis) that the Division of Drug Marketing, Advertising, and Communications (DDMAC) has identified direct-to-consumer (DTC) :30 television (TV) broadcast advertisements (ads) (“Allergy Wise Guys” and “Interruptive Symptoms”), print ads (ALG-JA 6366-1 and ALG-JA 6368-1), and a fulfillment letter (ALG-LT-7102-1) for Allegra (fexofenadine HCl) Tablets that contain false or misleading statements that violate the Federal Food, Drug, and Cosmetic Act (Act) (21 U.S.C. 352(a), (n)) and FDA implementing regulations (21 CFR 202.1(e)(5)(i)). Our specific objections follow.

Misleading Superiority Claims

The DTC TV and print ads contain the following claims:

“Seasonal allergies live to make you miserable. But Allegra is specifically designed to block the histamine that triggers so many symptoms. Maybe that’s why it’s the number 1 prescription antihistamine.” (TV ad voiceover)

“Allegra is specifically designed to block the histamine that triggers allergic responses....Which may be one reason it’s the number one prescription antihistamine.” (print ad)

These claims imply that because of its unique mechanism of action, namely, “Allegra is specifically designed to block the histamine that triggers allergic responses” (emphasis added), Allegra is clinically superior to other prescription antihistamines—in other words, “it’s the number 1 prescription antihistamine” because it is “specifically designed to block the histamine that triggers allergic responses.” However, because other prescription antihistamines, such as Zyrtec and Clarinex, have the same mechanism of action, selective peripheral H1 receptor antagonist activity, your suggestion of a

unique mechanism and superior effectiveness for Allegra is false or misleading. The clinical benefit from H1 antihistamines for allergic rhinitis is from H1 receptor blockade. The limited *in vitro* data suggesting that certain antihistamines have an effect on mediators beyond the H1 receptor have not been shown to translate to *in vivo* clinical benefit. We are not aware of substantial evidence or substantial clinical experience demonstrating that Allegra has superior efficacy compared to other prescription antihistamine products.

In addition, the fulfillment letter makes a misleading claim that Allegra is superior to other prescription antihistamines. Specifically, the letter uses retail pharmacy data to suggest that Allegra is more effective than all other prescription antihistamines for seasonal allergy relief:

“The one you’ll stay with [call-out headline, original bolded emphasis]

Allegra 180 mg tablets give seasonal allergy sufferers the convenient, 24-hour relief they’re looking for. In fact, results from a recent independent survey indicate that once people try Allegra 180 mg, they tend to stay with Allegra 180 mg – more than with any other brand of prescription antihistamine for seasonal allergy relief” (emphasis added).

This implies that Allegra is more effective than all other prescription antihistamines for seasonal allergy relief. To support this claim you cite a retrospective retail pharmacy database analysis (NDC Health’s “Allergy Market Persistency, Compliance, and Length of Therapy Analyses” Spring and Fall cohorts) from April 23, 2003. This analysis does not contain any data or information demonstrating that Allegra is more effective than other prescription antihistamines in relieving seasonal allergies. Moreover, the analysis does not account for the many other factors that affect patient compliance, such as cost, side effects, dosing schedule, ease of use, and dosage form. For these reasons, the analysis does not constitute substantial evidence or substantial clinical experience demonstrating that Allegra is more effective than other prescription antihistamines for seasonal allergy relief. Therefore, the claim that Allegra is more effective than other prescription antihistamines for seasonal allergy relief is misleading.

Moreover, your presentation of the database analysis is misleading, because you fail to disclose results from the analysis that showed better compliance rates with another branded prescription antihistamine. The results of the 12-month study for compliance (Spring cohort) showed that the Zyrtec family of products (defined as Zyrtec Syrup and Zyrtec Tablets) had the highest compliance rate at 46.7%, followed by the Allegra family of products (defined as Allegra 30 mg, Allegra 60 mg, Allegra 180 mg, and Allegra D) with 42.5%. Additionally, the results of the 12- and 18-month studies for compliance (Fall cohort) showed that the Zyrtec family had the best overall compliance rates with 45.0% and 41.3%, followed by the Allegra family with 41.5% and 37.6%, respectively.

Conclusions and Requested Actions

You should immediately cease distribution and use of these and other promotional materials for Allegra that contain the same or similar claims or presentations. Please submit a written response to DDMAC on or before January 14, 2004, describing your intent and plans to comply with the above. This letter should include the date on which this and other similarly violative materials were discontinued.

Your response may be directed to the undersigned by facsimile at (301) 594-6759, or at the Food and Drug Administration, Division of Drug Marketing, Advertising, and Communications HFD-42, Rm. 8B-45, 5600 Fishers Lane, Rockville, Maryland 20857. In all future correspondence on this matter, please refer to MACMIS ID #11481 as well as the NDA number. We remind you that we consider only written communications official.

Sincerely,

{See appended electronic signature page}

Christine Hemler Smith, Pharm.D.
Consumer Promotion Analyst
Division of Drug Marketing,
Advertising, and Communications

**This is a representation of an electronic record that was signed electronically and
this page is the manifestation of the electronic signature.**

/s/

Christine Smith
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