DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

MAY 30 1997

Transmitted Via Facsimile

Dave Garbe
Director, Scientific Information and Medical Compliance
Allergan, Inc.
2525 Dupont Drive
PO Box 19534
Irvine, CA 92713-9534

RE: NDA 19-921
Ocuflox (ofloxacin) Ophthalmic Solution 0.3%
MACMIS ID# 5402

Dear Mr. Garbe:

This letter is in reference to Allergan Pharmaceuticals, Inc.'s (Allergan) promotional campaign for Ocuflox. Based on promotional materials we have received as part of our monitoring program, the Division of Drug Marketing, Advertising, and Communications (DDMAC) has determined that Allergan is promoting Ocuflox (ofloxacin) ophthalmic solution 0.3% in violation of the Federal Food, Drug, and Cosmetic Act (Act), and its implementing regulations.

Misleading Claims of Effectiveness

In a "Dear Doctor" letter dated April 9, 1997, and signed by Craig Underhill, Territory Manager, Allergan states that "there seems to be a renewed interest in the importance of susceptibility rates versus MIC (minimum inhibitory concentration) values in the treatment of bacterial ocular infections." Allergan then discusses the susceptibility of key ocular pathogens to Ocuflox and Ciloxan (ciprofloxacin) Ophthalmic Solution relative to patterns of resistance using disk diffusion. Allergan then presents a table (with the headings: organism, number of isolates, Ocuflox, and Ciloxan) describing an in vitro bacterial susceptibility study in 93 bacterial species. Under the table, in smaller print, Allergan qualifies the table by stating "in vitro data; clinical significance is unknown." In the following paragraph Allergan concludes its presentation with the bolded statement that "Ocuflox is the most active antibacterial agent overall...."

Allergan makes similar claims in a brochure identified as RX9126. In a more comprehensive table using the same data, Allergan compares Ocuflox with

ciprofloxacin, norfloxacin, gentamicin, and tobramycin. The headline statement for this table is: "new in vitro data prove Ocuflox is the most active agent overall."

DDMAC is concerned that Allergan is using this information to differentiate Ocuflox from other topical anti-infective products, including Ciloxan, without substantial evidence based on adequate and well-controlled head-to-head clinical studies. DDMAC considers that the theme of "in vitro bacterial susceptibility" from disk diffusion studies as an indicator of clinical effectiveness, is an unsubstantiated clinical effectiveness claim for Ocuflox. Non-clinical data may not be used in a way that suggests that such data has clinical significance when such clinical significance has not been demonstrated. Although Allergan has qualified both tables by stating that in vitro data has unknown clinical significance, this statement does not correct the misleading presentation of claims in the remainder of the promotional material. Thus, Allergen's claims regarding superior antibacterial effectiveness of Ocuflox over other topical anti-infective products are false and/or misleading, and should be discontinued.

Additionally, we have no record that Allergan submitted these promotional materials at the time of their initial use under Form FDA 2253. Such submissions are required under the reporting requirements identified in 21 CFR 314.81 b)(3)(I).

Allergan should immediately cease disseminating the above promotional materials and any other promotional materials that claim that Ocuflox is superior to other topical antibacterial agents without substantial evidence based on adequate and well-controlled head-to-head clinical studies. DDMAC requests that Allergan respond in writing to DDMAC regarding this issue by June 13, 1997.

If you have any questions, please contact me by telephone at (301) 827-2831, by facsimile at (301) 594-6771, or by written communication at the Division of Drug Marketing, Advertising and Communications, HFD-40, Rm. 17B-20; 5600 Fishers Lane; Rockville, MD 20857.

In all future correspondence regarding this matter, please refer to MACMIS number 5402 and NDA 19-921. DDMAC reminds Allergan that only written communications are considered official.

Sincerely,

Warren Rumble

Warren F. Rumble
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications