CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

19-537/S038

19-847/S024

19-857/S027

19-858/S021

20-780/S008

CORRESPONDENCE

Bayer

Pharmaceutical Division

Bayer Corporation
400 Morgan Lane
West Haven, CT 06516-4175
Phone: 203 812-2000

May 25, 2000

Renata Albrecht, M.D., Acting Director
Division of Special Pathogens and Immunologic Drug Products
Office of Drug Evaluation IV (HFD-590)
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: NDA 19-537/S-038
CIPRO® (ciprofloxacin hydrochloride) Tablets
Supplemental New Drug Application - Anthrax Prophylaxis
Response to FDA Request

Dear Dr. Albrecht,

Bayer Corporation, Pharmaceutical Division acknowledges receipt of a facsimile message from Leo Chan, Project Manager, on May 12, 2000. Bayer provided a response to this correspondence via email to Mr. Chan on May 19, 2000, and is now responding formally with this letter. Copies of this correspondence will be submitted to the other CIPRO NDAs (19-847, 19-857, 19-858, and 20-780) in the manner previously agreed.

The Division makes two requests in its May 12th correspondence : for additional source data and to reformat the source data already submitted.

Bayer cannot immediately and independently accommodate these requests. As was discussed with the Division prior to the submission, and reiterated in the submission cover letter, none of the work on ciprofloxacin and anthrax was performed by or sponsored by Bayer. Because of this, we are hindered in our ability to reply to any information requests.

We obviously wish to aid the Division in their review and approval of this application. As such, we have formally asked Col. Friedlander to respond to these requests. Please see Appendix 1 for a copy of the correspondence sent by overnight courier to Col. Friedlander. Any response will be immediately forwarded to the Division.

Bayer

Pharmaceutical
Division

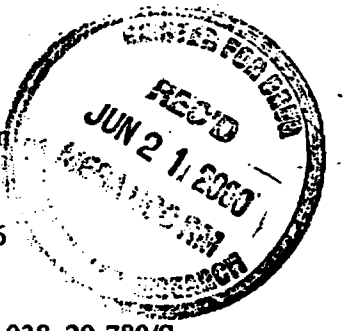
Gary G. Toczylowski
Director
Health, Environment
and Safety

ENVIRONMENTAL

Date: June 14, 2000

Name of Applicant/Petitioner: Bayer Corporation
Pharmaceutical Division

Address: 400 Morgan Lane
West Haven, CT 06516



The submission of environmental assessments for supplemental NDAs 19-537/S-038, 20-780/S-008, 19-847/S-024, 19-857/S-027 and 19-858/S-021 are not required, since there will be no significant increase in production or use of Ciprofloxacin as a result of these submissions.

As per 21 CFR section 25.31(a), the submission of an environmental assessment is not required for actions associated with supplements to an NDA if the action does not increase the use of the active moiety.

Since the manufacture and use of Ciprofloxacin associated with these supplemental NDAs fits the requirements of 21 CFR 25.31(a) categorical exclusion, environmental assessments are not being submitted.

Signature of Responsible Official
Gary Toczylowski, Director
Health, Environment and Safety

Bayer

Pharmaceutical Division

Bayer Corporation
400 Morgan Lane
West Haven, CT 06516-4175
Phone: 203 812-2000

June 30, 2000

Renata Albrecht, M.D., Acting Director
Division of Special Pathogens and Immunologic Drug Products
Office of Drug Evaluation IV (HFD-590)
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: NDA 19-537/S-038 CIPRO® (ciprofloxacin hydrochloride) Tablets Supplemental New Drug Application - Anthrax Prophylaxis Response to FDA Request

Dear Dr. Albrecht,

Bayer Corporation, Pharmaceutical Division acknowledges receipt of a facsimile message and an email message sent on June 14 and 19, 2000, respectively, concerning the CIPRO Anthrax prophylaxis supplements. Bayer has submitted these supplements on February 29, 2000 to all CIPRO New Drug Applications (19-537, 20-780, 19-847, 19-857, 19-858).

Answers to several of the questions posed by the Division have already been provided through both formal and informal communications. Find attached formal answers to the remaining queries.

If any questions or concerns arise from this information, do not hesitate to contact me at (203) 812-5172.

Sincerely,

Andrew S. Verderame
Associate Director, Regulatory Affairs

Desk Copy: Valerie Jensen, R. Ph., Project Manager

Bayer

Pharmaceutical Division

Bayer Corporation
400 Morgan Lane
West Haven, CT 06516-4175
Phone: 203 812-2000

August 29, 2000

Renata Albrecht, M.D., Acting Director
Division of Special Pathogens and Immunologic Drug Products
Office of Drug Evaluation IV (HFD-590)
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: NDA 19-847/S-024, 19-857/S-027, 19-858/S-021, 20-780/S-008
CIPRO®
Supplemental New Drug Applications – Inhalational Anthrax
Response to FDA Request

Dear Dr. Albrecht,

Bayer Corporation, Pharmaceutical Division agrees to the following language to be placed in an approval letter to the referenced supplemental new drug applications and commits to perform the activities described:

"To cooperate with U.S.-based public health agencies in evaluating data on the use of CIPRO® brand of ciprofloxacin in a large U.S. population for inhalational anthrax (post exposure), should an exposure occur. Your assistance would consist of evaluating data (including but not limited to utilization, outcomes, adverse events) collected and examined by the agency. You will not be required to collect, handle or evaluate any clinical specimens or otherwise expose your staff or operations to any potentially contaminated area or substance."

If there are any additional questions or concerns, please contact me at (203) 812-5172.

Sincerely,

Andrew S. Verderame
Associate Director, Regulatory Affairs

DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

NDA 19-537/S-038
NDA 19-847/S-024
NDA 19-857/S-027
NDA 19-858/S-021
NDA 20-780/S-008

AUG 30 2000

Bayer Corporation
Pharmaceutical Division
Attention: Andrew S. Verderame
Associate Director, Regulatory Affairs
400 Morgan Lane
West Haven, CT 06416-4175

Dear Mr. Verderame:

Please refer to your supplemental new drug application, NDA 19-537/S-038, dated February 29, 2000, received March 1, 2000, and your supplemental new drug applications, NDAs 19-847/S-024, 19-857/S-027, 19-858/S-021, and 20-780/S-008, dated February 29, 2000, and received March 2, 2000, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for CIPRO® (ciprofloxacin hydrochloride) Tablets, IV Solution, IV in 5% Dextrose, IV in 0.9% Saline, and Oral Suspension, respectively.

These supplements provide for the use of CIPRO® for inhalational anthrax (post-exposure).

As noted in the approval letter for these supplements, products approved under the accelerated approval regulations, 21 CFR 314.510, require further studies to verify and describe clinical benefit. We acknowledge receipt of your letter dated August 29, 2000, stating your Subpart H, Phase 4 commitment. As we agreed, the following Subpart H Phase 4 commitment is specified in the approval letter:

> To cooperate with U.S.-based public health agencies in evaluating data on the use of CIPRO® brand of ciprofloxacin in a large U.S. population for inhalational anthrax (post-exposure), should an exposure occur.

As we discussed during our teleconference with you on August 29, 2000, we agree that your commitment will consist of evaluating data (including but not limited to utilization, outcomes, adverse events) collected by the public health or other agencies and examined by the agency. You will not be required to collect, handle or evaluate any clinical specimens or otherwise expose your staff or operations to any potentially contaminated area or substance.

If you have any questions, call Valerie Jensen, R.Ph., Regulatory Project Manager, at (301) 827-2127.

Sincerely,

/S/

Dianne Murphy, M.D.
Director
Office of Drug Evaluation IV
Center for Drug Evaluation and Research