THE WEINBERG GROUP INC.

1220 Nineteenth St, NW, Suite 300
Washington, DC 20036-2400
Phone 202.833.8077
Fax 202.833.7057
e-mail science@weinberggroup.com

WASHINGTON
NEW YORK
SAN FRANCISCO
BRUSSELS
PARIS

June 25, 2001

Dockets Management Branch
Food and Drug Administration
Department of Health and Human Services
HFA-305, Room 1061
5630 Fishers Lane
Rockville, MD 20857

CITIZEN PETITION

Pursuant to 21 CFR 10.20 and 10.30, the undersigned is submitting this petition under Section 505(j)(2)(C) of the Federal Food, Drug and Cosmetic Act to request that the Commissioner of the Food and Drug Administration make a determination that an Abbreviated New Drug Application may be submitted for Pentoxifylline Extended-release Tablets, 500 mg.

A. Action Requested

The petitioner requests that the Commissioner of the Food and Drug Administration make a determination that Pentoxifylline Extended-release Tablets, 500 mg, are suitable for submission as an Abbreviated New Drug Application. The reference listed drug product upon which this petition is based is Trental® (Pentoxifylline Extended-release Tablets), 400 mg (Aventis). The petitioner seeks a change in strength from that of the reference listed drug product to include a 500 mg strength of the Pentoxifylline Extended-release Tablets. This difference in strength is permitted by 21 CFR 314.93(b).

B. Statement of Grounds

The Federal Food, Drug and Cosmetic Act provides for the submission of an Abbreviated New Drug Application for a new drug that differs in strength from a listed drug provided the FDA has approved a petition that proposed the filing of such an application. This petition involves a change in the strength for the proposed drug from that of the listed drug. The listed drug on which this petition is based is manufactured by Aventis. The listing of Trental® Tablets is included in the current (through March 2001) Electronic Orange Book Approved Drug Products with Therapeutic Equivalence Evaluations (Attachment I).

The approved labeling indicates that total daily doses up to 1200 mg may be administered in divided doses. Based on approved labeling, 400 mg may be given two or three times daily. A 500 mg tablet would provide a convenient alternative tablet strength for patients who may require an intermediate total daily dose between the 800 mg and 1200 mg total daily dose that is now available. The petitioner believes that the 500 mg tablet is consistent with the total daily dosage recommendations included in the approved labeling of the reference listed drug. The proposed tablet strength would offer the physician an alternate tablet strength for use by patients for whom this total daily dose was deemed appropriate. The availability of a 500 mg tablet would provide greater flexibility for the physician by allowing dosage titration for patients that may require between 800 mg and 1200 mg per day to adequately treat the symptoms of intermittent claudication. Because this is an extended-release dosage form, this additional dosing flexibility should benefit patients requiring greater than 800 mg per day, but less than 1200 mg per day to control symptoms and minimize potential adverse events. It is not believed that the proposed change in strength will raise questions of safety or efficacy, since the proposed product's dosage will be maintained within the current total daily dosage limits.

A copy of the reference listed drug labeling and draft labeling for the proposed pentoxifylline tablets are enclosed (Attachments II and III). The uses and indications for the proposed product are the same as those for Trental® Tablets, the reference listed drug. Additionally, the total daily dose of the proposed product is within the range of total daily doses recommended for the reference listed drug.

C. Pediatric Use Information

Pursuant to 21 CFR 314.55, the petitioner hereby requests a waiver of the pediatric study requirements for Pentoxifylline Extended-release Tablets, 500 mg. The petitioner requests this waiver on the basis of the Federal Register notice published by the Food and Drug Administration (FDA) on December 2, 1998 (63 FR 6632).

Pentoxifylline Extended-release Tablets are indicated for the treatment of patients with intermittent claudication on the basis of chronic occlusive arterial disease of the limbs. Intermittent claudication is a very rare condition in children and would only occur after trauma or if the child had a congenital defect. The basis of the waiver request is that the drug product "is not likely to be used in a substantial number of pediatric patients" [21 CFR 314.66(c)(2)(i)]. As discussed in the 63 FR 66632 notice, the FDA has defined a "substantial number of pediatric patients" as "50,000 pediatric patients with the disease or condition for which the drug ... product is indicated." The number of pediatric patients with intermittent claudication is significantly below the designated 50,000.

Based on the above information, the petition considers Pentoxifylline Extended-release Tablets, 500 mg eligible for a full waiver of the requirement of 21 CFR 314.55(a).

D. Environmental Impact

An environmental assessment on the action requested in this petition qualifies for a categorical exclusion under 21 CFR 25.24(c)(1) as provided for in 21 CFR 25.23(c). Therefore, an environmental assessment is not required for the requested action.

E. Economic Impact

Pursuant to 21 CFR 10.30 (b), economic impact information is to be submitted only when requested by the Commissioner. The petitioner will promptly provide such information if so requested.

F. Certification

The undersigned certifies that, to its best knowledge and belief, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioner, which are unfavorable to the petition.

Respectfully submitted,

Nicholas M. Fleischer, R.Ph., Ph.D.
Director of Biopharmaceutics
THE WEINBERG GROUP INC.

NMF/alh

Attachments: Electronic Orange Book pages
Trental® Insert Labeling
Draft Insert Labeling for Pentoxifylline Extended-release Tablets, 500 mg

cc: Gary Buehler, Director (Acting) Office of Generic Drugs (w/encls.)