DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

DEC 18 2003

NADA 141-193

Ms. Flor A. Miranda
Regulatory Compliance Specialist
Schering-Plough Animal Health Corporation
1095 Morris Avenue
Union, NJ 07083

Dear Ms. Miranda:

This letter is in reference to Drug Experience Reports (DERs) submitted by Schering-Plough Animal Health Corporation (SPAH) for Zubrin (tepoxalin), NADA 141-193, dated April 15, 2003 (trade advertisement), May 29, 2003 (Zubrin "Visit SPAH Booth" Card), and a Technical Monograph (SPAH-ZB-10) that was received from sales representatives at the July 2003 national meeting of the American Veterinary Medical Association.

These materials include the statement "the only canine NSAID to block both arms of the arachidonic acid cascade – cyclooxygenase (COX) and lipoxygenase (LOX)," which appears in the April 15, 2003, submission; the statement "only new Zubrin blocks both arms of the arachidonic acid cascade -- COX and LOX," which appears on the "Visit SPAH Booth" card in the May 29, 2003 submission; and the statement "Zubrin is a potent new NSAID that not only inhibits COX-1 and COX-2 but also inhibits 5-lipoxygenase (LOX)," which appears in the Technical Monograph.

These statements suggest that COX or LOX selectivity is clinically significant. We are not aware of substantial evidence or substantial clinical experience substantiating these claims. Absent such substantiation or an appropriate disclaimer (such as "the clinical significance of these data is unknown"), these materials are false or misleading in violation of § 502(a) and § 502(n) of the Federal Food, Drug, and Cosmetic Act [21 USC 352(a) and 352(n)] and FDA implementing regulations (21 CFR 202.1(e)(5)(i), (e)(6)(vii)).

We remind you that during the drug development process, the Center had detailed discussions with your firm regarding this issue and its significance. We also note that your Technical Monograph contains the statements "tepoxalin is COX-1 preferential," followed by "classifying and comparing NSAIDs on the basis of *in vitro* activity against COX-1 and COX-2 without qualification are also questionable." Thus, your own Technical Monograph acknowledges the "questionable" practice of classifying and comparing your product on the basis of *in vitro* activity without qualification, and yet such classifications and comparisons appear in your DER submissions and elsewhere in the Technical Monograph without qualification.

We request that you immediately stop dissemination of these and any other similar promotional pieces and promote your products in a manner that is consistent with the promotion and advertising regulations. Please inform us of your intentions within 30 days of receipt of this letter. If you have any questions, you may contact us at (301) 827-6642.

Sincerely yours,

Mohammad I. Sharar, DVM., M.Sc.
Team ~~Leader,~~ Marketed Product Scientific
and Regulatory Review, Team II, HFV-216
Division of Surveillance
Center for Veterinary Medicine