



TRANSMITTED BY FACSIMILE

Susan P. Rinne
Vice President, Regulatory Affairs
Alza Corporation
1900 Charleston Road
P.O. Box 7210
Mountain View, CA 94039-7210

RE: NDA # 20-897
Ditropan XL® (oxybutynin chloride) Extended-Release Tablets
MACMIS ID # 10196

Dear Ms. Rinne:

This letter objects to Alza Corporation's (Alza) dissemination of violative promotional materials for Ditropan XL (oxybutynin chloride) extended-release tablets. As part of its monitoring program, the Division of Drug Marketing, Advertising and Communications (DDMAC) has become aware of direct-to-consumer (DTC) broadcast and print advertisements for Ditropan XL that are false or misleading, in violation of the Federal Food, Drug, and Cosmetic Act (Act) and its implementing regulations. The DTC broadcast ("Stop and Go") and print (0011708) advertisements, submitted on Form FDA 2253, are violative for the reasons described below.

Inadequate Communication of Indication

The approved product labeling (PI) states that "Ditropan XL is a once-daily controlled-release tablet indicated for the treatment of overactive bladder with symptoms of urge urinary incontinence, urgency, and frequency." Your broadcast advertisement is misleading because it fails to adequately convey the symptoms of overactive bladder. Specifically, the supers describing these symptoms are displayed too briefly to be comprehended by consumers.

Overstatement of Efficacy

Broadcast Advertisement

Promotional materials are misleading if they suggest that a drug is more effective than has been demonstrated by substantial evidence. Your broadcast advertisement presents efficacy claims for Ditropan XL stating in the audio that "Ditropan XL is a prescription medication for overactive bladder proven to reduce wetting accidents by up to 90% versus 51% for a sugar pill" along with the prominent graphic of "90%" in the middle of the screen and the tagline "Reduces accidents by up to 90%." This overall presentation is unbalanced and, therefore, misleading because it overwhelmingly emphasizes the 90% reduction in wetting accidents with Ditropan XL. Furthermore, the graphic presenting that

Ditropan XL decreased wetting accidents from 16 to 2 per week while the sugar pill decreased wetting accidents from 21 to 11 per week is too complex for consumers to comprehend and assimilate in a 60-second broadcast advertisement.

In addition, your broadcast advertisement fails to prominently disclose important facts regarding the limitations of the clinical trials. Specifically, the clinical trials for Ditropan XL were set up to include only patients who were known to have had improved symptoms on oxybutynin, the active ingredient in Ditropan XL, or other similar medications used to treat overactive bladder. This qualifying message is not presented with adequate prominence to provide sufficient context to the efficacy claims. Your small super at the bottom of the screen briefly stating "Studies included patients known to be responsive to oxybutynin" fails to correct this misleading impression regarding the efficacy of Ditropan XL.

Print Advertisement

Similarly, your print advertisement claims that Ditropan XL "Reduces wetting accidents caused by overactive bladder by 83% to 90%" and "Once-a-day Ditropan XL reduced wetting accidents caused by overactive bladder by 83%-90%." Your print advertisement either fails to acknowledge or fails to prominently disclose that patients randomized to placebo experienced a 51% reduction in the number of wetting accidents. Similarly, your print advertisement fails to prominently disclose that the clinical trials were set up to include only patients who the sponsor knew would have improved symptoms on Ditropan XL because they were known to have had improved symptoms on oxybutynin, the active ingredient in Ditropan XL, or other similar medications used to treat overactive bladder. Again, this qualifying message is not presented with reasonably comparable prominence to the efficacy claims. Your graphic in the middle column in the print advertisement fails to correct this misleading impression regarding the efficacy of Ditropan XL.

Major Statement

The clutter and distraction of the moving car in the background during the presentation of the major statement in the broadcast advertisement minimizes the risks of Ditropan XL.

Requested Action

Alza should immediately discontinue these and all other promotional materials and activities for Ditropan XL that contain the same or similar claims or presentations. We request that Alza respond, in writing, with its intent to comply with the above. DDMAC should receive your written response no later than July 26, 2001. This response should list similarly violative materials with a description of the method for discontinuation and the discontinuation date.

If you have any questions or comments, please contact me by facsimile at (301) 594-6771, or at the Food and Drug Administration, Division of Drug Marketing, Advertising and Communications, HFD-42, Rm. 17B-20, 5600 Fishers Lane, Rockville, MD 20857. We remind you that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID #10196 in addition to the NDA number.

Sincerely,

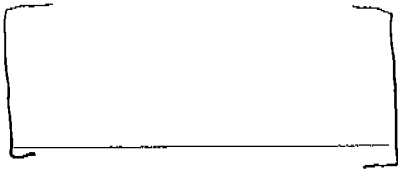
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Barbara S. Chong, Pharm.D., BCPS
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications

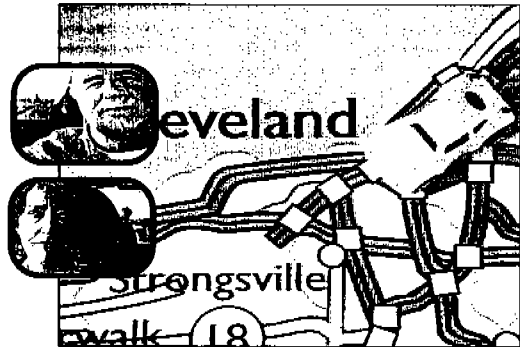
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this page is the manifestation of the electronic signature.**

/s/

Barbara Chong
7/12/01 09:18:14 AM



ALZA
DITROPAN XL® (1 OF 3)
 AZDT0176 :60 TV
 05/03/01
 "Stop and Go"



OPEN ON A MAP AS A SMALL TOY CAR DRIVES ACROSS A WINDING ROAD. SOUND EFFECTS OF A CAR STOPPING AND STARTING, DOORS OPENING AND CLOSING, FOOTSTEPS RUNNING BACK AND FORTH TO CAR. AS THEY SPEAK, A WOMAN...

Adele: Frank, stop here.
Frank: What for?
Adele: I gotta go.



AND MAN POP UP IN MULTIPLE IMAGES WITH THE MAP/CAR VISUAL.

Adele: Frank, pull in there.
Frank: Can't you wait?
Adele: You want me to have an accident?

Symptoms of an overactive bladder may include
wetting accidents,
a strong need to urinate,
urinating often.

Once-a-day
DITROPAN XL
 (oxybutynin chloride) Extended-release Tablets 5, 10, 15 mg

THE LOGO APPEARS. SYMPTOMS SUPER POPS UP.

AVO: Ditropan XL® is a prescription medication for overactive bladder proven

ACCIDENTS PER WEEK

With Ditropan XL®...Reduced from 16 to 2
 With Sugar Pill.....Reduced from 21 to 11

90%

Reduces accidents by up to 90%

Studies included patients known to be responsive to oxybutynin.

SUPERS POP UP.

to reduce wetting accidents by up to 90% versus 51% with a sugar pill. Isn't it time to ask your doctor about once-a-day Ditropan XL®?



ALZA
DITROPAN XL® (2 OF 3)
AZDT0176 :60 TV
05/03/01
"Stop and Go"

CUT TO MAP, CAR, FRANK, AND ADELE.



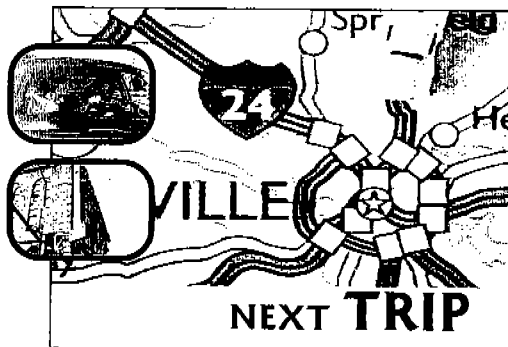
Adele: Frank, if you don't pull over, we're gonna float to Phoenix!

LOGO AND PHONE NUMBER SUPER POP UP.



AVO: Ask your doctor about overactive bladder and if once-a-day Ditropan XL® is right for you... or call 1-888-395-1232 for more information.

CAR DRIVES ACROSS MAP WITH STOP-AND-START SOUND EFFECTS CONTINUING.



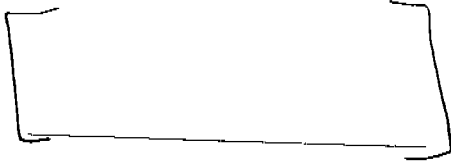
If you have certain types of stomach, urinary, or glaucoma problems, you should not take Ditropan XL®.

SUPER: Next TRIP.

CUT TO A DRIVE THROUGH TOWN.



**Adele: Frank, stop there.
Frank: You gotta go?**

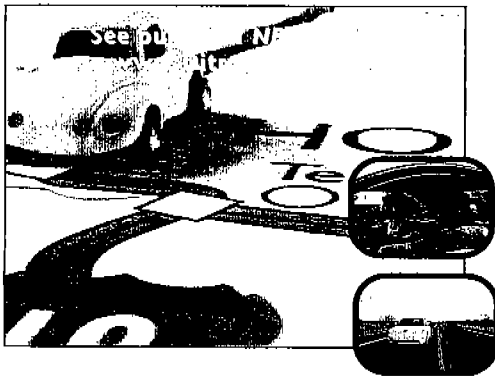


ALZA
DITROPAN XL® (3 OF 3)
AZDT0176 :60 TV
4/16/01
"Stop and Go"



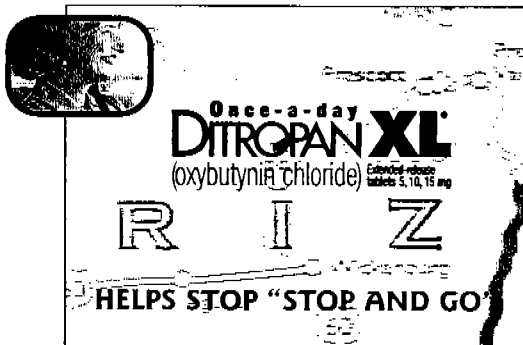
CAR KEEPS MOVING ALONG AS CUT TO FRANK AND ADELE.

Adele: No, my doctor prescribed Ditropan XL®. I'm fine. But, they've got the best chili in the world!
Frank: (GROANS)



CAR DRIVES ACROSS MAP WITH STOP-AND-START SOUND EFFECTS CONTINUING.

AVO: In studies, the most common side effect was dry mouth. Other side effects may include constipation, drowsiness, blurred vision, dizziness, diarrhea, and nausea.



ADELE RETURNS AS WEBSITE SUPER POPS UP AND THE LOGO FADES UP OVER MAP.

AVO: Why just live around your overactive bladder when it can be treated with Ditropan XL®?

Cover 2

ing



Reduces wetting accidents caused by overactive bladder by 83% to 90%.*

XL

Extended-release tablets 5, 10, 15 mg

and Go."

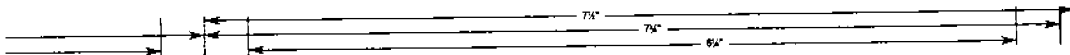
overactive hours.

*This and other clinical studies included patients known to have had symptoms improve with oxybutynin or other similar medications.



Once-a-day
DITROPAN XL
(oxybutynin chloride) Extended-release tablets 5, 10, 15 mg

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"Frank, if you don't find a bathroom, we're going to float to Phoenix!"

Once-a-day
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- Do you have t
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- Do you often
to urinate?
- Do you have a
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If you are experiencin
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or other similar medicati

Once-a-day **Ditropan XL**[®] reduced wetting accidents caused by overactive bladder by **83% to 90%***

If you frequently have to find a bathroom in a hurry to prevent having wetting accidents, ask your doctor if Ditropan XL[®] is right for you.

Effective treatment for overactive bladder.

Overactive bladder is a common condition affecting more than 17,000,000 Americans. The symptoms include urge incontinence episodes (wetting accidents), urgency (a strong need to urinate), and frequency (urinating often).

It's important to know that overactive bladder is not a normal part of aging and you do not have to accept it as a way of life. Today, overactive bladder may be effectively treated for up to 24 hours with a single dose of Ditropan XL[®].

Proven to reduce wetting accidents by up to 90%.

In other words, in a clinical study, people who were experiencing 16 wetting accidents a week before Ditropan XL[®] were experiencing only 2 with Ditropan XL[®], versus patients taking a sugar pill, whose wetting accidents were reduced from 21 to 11.

*This and other clinical studies included patients known to have symptoms improve with oxybutynin or other similar medications.

Ditropan[®] and Ditropan XL[®] are registered trademarks of ALZA Corporation.

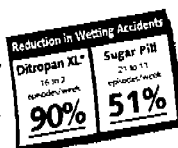
Ask your doctor about Ditropan XL[®].

The most common side effect with Ditropan XL[®] was dry mouth (61%). However, only 1% of people discontinued medication for this reason. Other common side effects may include constipation (13%), drowsiness (12%), diarrhea (9%), blurred vision (8%), dry eyes (6%), dizziness (6%), and runny nose (6%). Only 7% of patients in clinical studies discontinued therapy due to side effects. Do not take Ditropan XL[®] if you have certain types of stomach, urinary, or glaucoma problems.

Only your doctor can diagnose your bladder control problem. For more information about Ditropan XL[®], speak to your doctor or call toll-free, 1-888-887-8620, or visit our web site at www.DitropanXL.com

Find out how the proven effectiveness of Ditropan XL[®] may be able to help you put a stop to "Stop and Go."

Please see brief summary of product information on next page.



Once-a-day
DITROPAN XL
(oxybutynin chloride) Extended-release
tablets 5, 10, 15 mg

Helps stop "Stop and Go."

© 2001 ALZA Corporation

Patient Information About

Once-a-day
DITROPAN XL
(oxybutynin chloride) Extended-release
tablets 5, 10, 15 mg

Important Information for Patients Using DITROPAN XL[®]
Please read this information before you start taking DITROPAN XL[®]. A case new information becomes available, the doctor's instructions. Ask your doctor or pharmacist for more information.

What is DITROPAN XL[®]?
DITROPAN XL[®] is used for the treatment of overactive bladder (urge incontinence, urgency, frequency, and nocturia).

What should I know about overactive bladder?
Overactive bladder is a condition in which the muscles in the bladder contract too often, you may not be able to wait and urinate when you need to. The symptoms of overactive bladder generally include a strong need to urinate, and frequency (urinating often).

How does DITROPAN XL[®] work?
DITROPAN XL[®] is an anticholinergic medication that relaxes the muscles in the bladder, which helps you urinate when you need to.

Does DITROPAN XL[®] cure overactive bladder?
DITROPAN XL[®] is not a cure for overactive bladder. It is used to manage (control) the symptoms of overactive bladder.

Who should NOT take DITROPAN XL[®]?
Do not take DITROPAN XL[®] if:

• You are allergic to oxybutynin or any of the ingredients in DITROPAN XL[®].

• You have certain types of glaucoma, urinary or stomach problems, or if you are pregnant or breastfeeding.

• You are taking certain medications, including certain antidepressants, muscle relaxants, and sedatives.

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