



Our STN: BL 103950/5019

Amgen, Incorporated
Attention: Douglas Hunt
Director, Regulatory Affairs
One Amgen Center Drive
Thousand Oaks, CA 91320-1799

Dear Mr. Hunt:

Your request to supplement your biologics license application for Anakinra to expand the indication to include slowing the progression of structural damage in moderately to severely active rheumatoid arthritis, in patients 18 years of age or older who have failed one or more disease modifying antirheumatic drugs (DMARDs) has been approved.

This fulfills your commitment to submit data from an ongoing study to evaluate the ability of Anakinra to slow radiographic disease progression as stated in commitment number 1 of the November 14, 2001, approval letter.

FDA's Pediatric Rule at 21 CFR 314.55 and 21 CFR 601.27 was challenged in court. On October 17, 2002, the court ruled that FDA did not have the authority to issue the Pediatric Rule and barred FDA from enforcing it. Although the government decided not to pursue an appeal in the courts, it will work with Congress in an effort to enact legislation requiring pharmaceutical manufacturers to conduct appropriate pediatric clinical trials. In addition, third party intervenors have decided to appeal the court's decision striking down the rule. We acknowledge your plan regarding pediatric studies. Please be aware that whether or not this pediatric plan and subsequent submission of pediatric data will be required depends upon passage and specific requirements of legislation or the success of the third party appeal. In any event, we hope you will decide to conduct the appropriate pediatric studies to provide important information on the safe and effective use of this drug in the relevant pediatric populations.

Pursuant to 21 CFR 201.57(f)(2), patient labeling must be reprinted at the end of the package insert. We request that the text of information distributed to patients be printed in a minimum of 10 point font.

Please submit all final printed labeling at the time of use and include implementation information on FDA Form 356h. Please provide a PDF-format electronic copy as well as original paper copies (ten for circulars and five for other labels). In addition, you may wish to submit draft copies of the proposed introductory advertising and promotional labeling with an FDA Form 2253 to the Center for Biologics Evaluation and Research, Advertising and Promotional Labeling Branch, HFM-602, 1401 Rockville Pike, Rockville, MD 20852-1448. Final printed advertising and promotional labeling should be submitted at the time of initial dissemination, accompanied by an FDA Form 2253.

All promotional claims must be consistent with and not contrary to approved labeling. You should not make a comparative promotional claim or claim of superiority over other products unless you have submitted data to support such claims to us and had them approved.

The regulatory responsibility for review and continuing oversight for this product transferred from the Center for Biologics Evaluation and Research to the Center for Drug Evaluation and Research effective June 30, 2003. For further information about the transfer, please see <http://www.fda.gov/cber/transfer/transfer.htm> and <http://www.fda.gov/OHRMS/DOCKETS/98fr/03-16242.html>. Until further notice, however, all correspondence, except as provided elsewhere in this letter, should continue to be addressed to:

CBER Document Control Center
Attn: Office of Therapeutics Research and Review
Suite 200N (HFM-99)
1401 Rockville Pike
Rockville, Maryland 20852-1448

This information will be included in your biologics license application file.

Sincerely,

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Patricia Keegan, M.D.
Acting Director
Division of Clinical Trials Design and Analysis
Office of Therapeutics Research and Review
Center for Drug Evaluation and Research