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1202 '06 JUL 19 P1 35

Wyeth

July 19, 2006

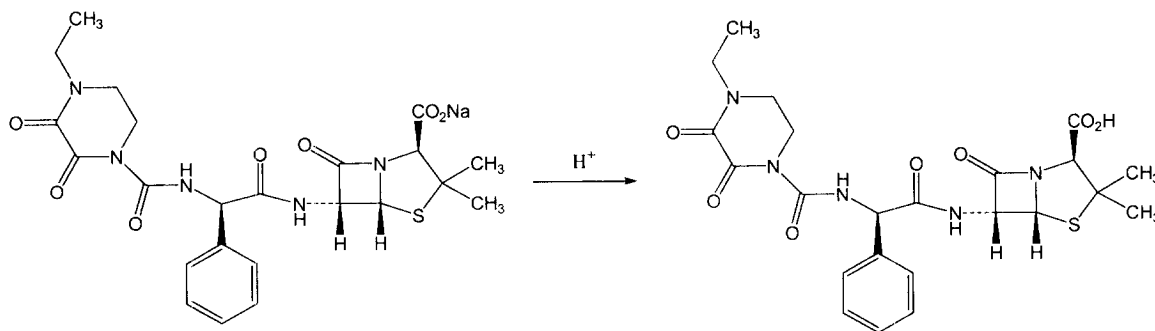
Division of Dockets Management
Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket 2006P-0173; Second Supplement, Clarifying and Correcting
Citizen Petition

Dear Sir or Madam:

Wyeth hereby submits additional information to supplement its Citizen Petition submitted on April 25, 2006 (Docket No. 2006P-0173). In that petition, Wyeth included several figures, one depicting the conversion of soluble piperacillin sodium into an insoluble free acid (Figure 1 of the Citizen Petition) and one depicting the formation of a piperacillin dimer following hydrolysis of piperacillin molecules (Figure 2 of the Citizen Petition). Wyeth wishes to now clarify and correct those figures by replacing them with the following Figures 1 and 2.

Figure 1
Conversion of Soluble Piperacillin Sodium into an Insoluble Free Acid



2006P-0173

SUP 2

Figure 1 has been revised to conform to the manner in which piperacillin is graphically depicted in the Zosyn® package insert. In addition, Figure 1 has been corrected to (1) close the piperacillin beta-lactam ring, which was partially opened in the original figure, and (2) remove certain typographical errors.

Figure 2
Hydrolysis of Piperacillin Followed by Formation of Piperacillin Dimer

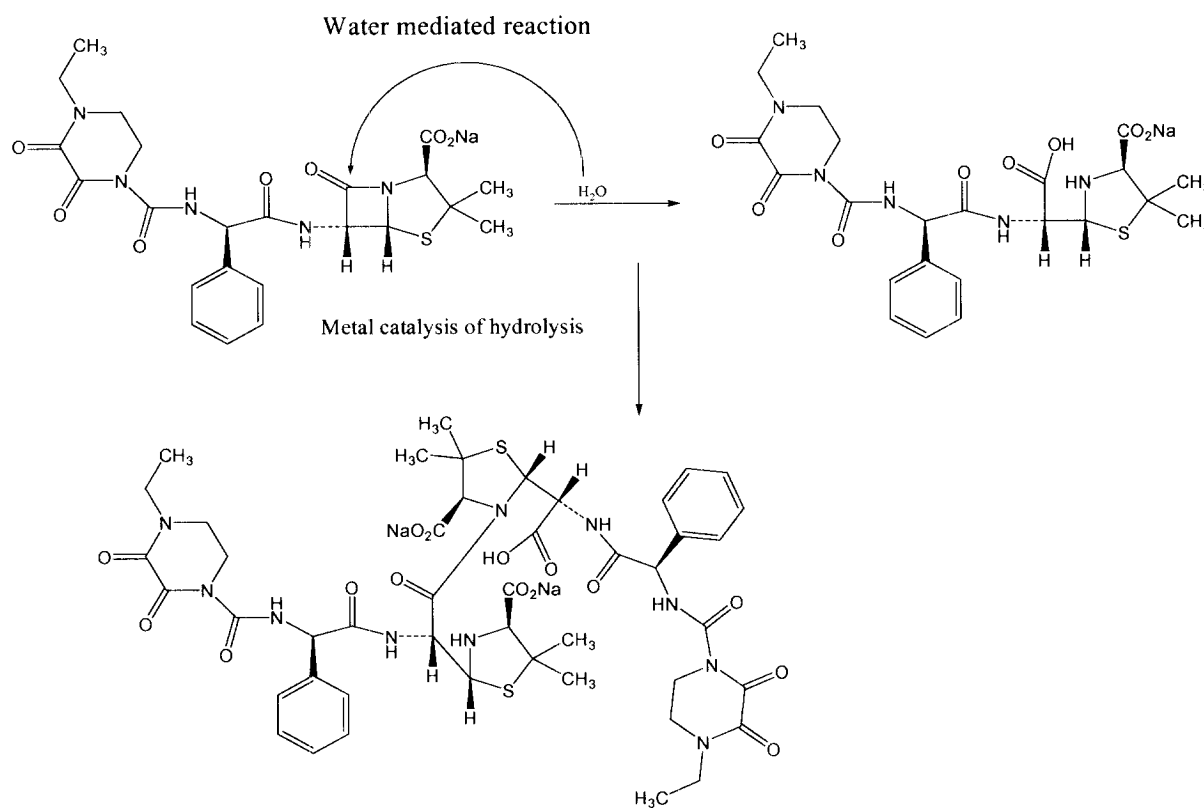


Figure 2 has also been revised to conform to the manner in which piperacillin is graphically depicted in the Zosyn® package insert. In addition, Figure 2 has been corrected to remove certain typographical errors.

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The changes made to Figures 1 and 2 do not affect the substantive discussion in our Citizen Petition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Geoffrey M. Levitt". The signature is fluid and cursive, with a stylized "G" and "L".

Geoffrey M. Levitt
Vice President & Chief Counsel
Regulatory and Research