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

SUITABILITY PETITION

Dear Sir/Madam:

The undersigned, on behalf of a client, submits this Suitability Petition pursuant to Section 505(j)(2)(C) of the Federal Food, Drug and Cosmetic Act ("FDC Act") and in accordance with 21 C.F.R. § 314.93 and 21 C.F.R. §§ 10.20 and 10.30, to request that the Commissioner of the U.S. Food and Drug Administration ("FDA") declare that the drug products Doxycycline Hyclate Tablets, 20 mg, 50 mg, 75 mg and 150 mg, are suitable for consideration in an Abbreviated New Drug Application ("ANDA").

A. Action Requested

The petitioner requests that the FDA declare that Doxycycline Hyclate Tablets, 20 mg, 50 mg, 75 mg and 150 mg, are suitable for submission as an ANDA. As designated in FDA's *Approved Drug Products with Therapeutic Equivalence Evaluations* ("Orange Book"), the Reference Listed Drug ("RLD") upon which this petition is based is VIBRA-TABS (doxycycline hyclate) Tablets (film coated), 100 mg, which is approved under NDA 050533 and is currently held by Pfizer Laboratories Div. Pfizer Inc ("Pfizer").[1] The

[1] VIBRA-TABS (NDA 050533) is listed in the Discontinued Drug Product List section of the Orange Book and is not currently marketed. FDA has already determined that VIBRA-TABS (NDA 050533) was not discontinued for reasons of safety or effectiveness. See FDA, Notice, Determination That DRIXORAL (Dexbrompheniramine Maleate; Pseudoephedrine Sulfate) Tablet and Other Drug Products Were Not Withdrawn From Sale

petitioner seeks to introduce new 20 mg, 50 mg, 75 mg, and 150 mg doxycycline hyclate tablet strengths.

B. Statement of Grounds

FDC Act § 505(j)(2)(A)(iii) provides for the submission of an ANDA for a drug product that differs in strength from that of the listed drug provided FDA has first approved a petition permitting the submission of such an application.

VIBRA-TABS (NDA 050533) contains 100 mg of doxycycline hyclate in a tablet dosage form. A copy of the current Orange Book entry for VIBRA-TABS (NDA 050533) is included in ***Attachment 1***. The proposed drug products also contains doxycycline hyclate in a tablet dosage form, but in 20 mg, 50 mg, 75 mg, and 150 mg strengths. The petition is thus seeking a change in tablet strengths to 20 mg, 50 mg, 75 mg and 150 mg of doxycycline hyclate from that of the RLD.

The proposed changes in strength are consistent with the dosing recommendations of the RLD's approved labeling. For example, the prescribing information for VIBRA-TABS provides the following dosing information:

> **Adults**
>
> The usual dose of oral doxycycline is 200 mg on the first day of treatment (administered 100 mg every 12 hours) followed by a maintenance dose of 100 mg/day. In the management of more severe infections (particularly chronic infections of the urinary tract), 100 mg every 12 hours is recommended.
>
> **Pediatric Patients**
>
> For all pediatric patients weighing less than 45 kg with severe or life-threatening infections (e.g., anthrax, Rocky Mountain spotted fever), the recommended dosage is 2.2 mg/kg of body weight administered every 12 hours. Children weighing 45 kg or more should receive the adult dose. (See WARNINGS and PRECAUTIONS.)

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for Reasons of Safety or Effectiveness 79 Fed. Reg. 47,648, 47,649 (Aug. 14, 2014), available at https://www.govinfo.gov/content/pkg/FR-2014-08-14/pdf/2014-19272.pdf.

> For pediatric patients with less severe disease (greater than 8 years of age and weighing less than 45 kg), the recommended dosage schedule is 4.4 mg/kg of body weight divided into two doses on the first day of treatment, followed by a maintenance dose of 2.2 mg/kg of body weight (given as a single daily dose or divided into twice daily doses). For pediatric patients weighing over 45 kg, the usual adult dose should be used.

VIBRA-TABS, Prescribing Information, Dosage and Administration (Oct. 2019).

The availability of new strengths is consistent with the dosing instructions for the RLD and could aid patient compliance in easily attaining the most effective dose. The proposed changes in strength from that of the RLD do not raise questions of safety or efficacy for the proposed drug products. Therefore, the Agency should conclude that clinical investigations are not necessary to demonstrate safety or effectiveness of the proposed drug products.

There are no proposed changes in labeling with the exception of changes in strength sought in this petition. The uses, indications, warnings, and directions for use will remain the same as that of the RLD. Approved labeling for VIBRA-TABS (NDA 050533), updated in October 2019, is included as ***Attachment 2***. Draft labeling for the proposed drug products is included as ***Attachment 3***. Therefore, the Petitioner requests that FDA find that changes in tablet strength from 100 mg to 20 mg, 50 mg, 75 mg, and 150 mg of doxycycline hyclate raise no questions of safety or effectiveness.

The Pediatric Research Equity Act ("PREA"), enacted in December 2003, amended the FDC Act by requiring certain applications for a drug submitted under FDC Act § 505 to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is deferred or waived. See FDC Act § 505B(a)(I)(A)(i). Specifically, PREA applies to all applications for a new active ingredient, dosage form, indication, route of administration, or dosing regimen. See id. ANDAs submitted under an approved suitability petition for a change in strength are not subject to PREA requirements. See FDA, Draft Guidance for Industry, How to Comply with the Pediatric Research Equity Act, 4 (Sep. 2005). Petitioner asserts that PREA is not applicable to the proposed doxycycline hyclate, 20 mg, 50 mg, 75 mg, and 150 mg, drug products because the proposed changes concerns only new strengths. As such, PREA should not serve as an impediment to the Agency granting this petition.

C. Environmental Impact

A claim for categorical exclusion of the requirements for an environmental assessment is made pursuant to 21 C.F.R. § 25.31.

D. Economic Impact

Pursuant to 21 C.F.R. § 10.30(b), economic impact information is submitted only when requested by the Commissioner. This information will be promptly provided, if so requested.

E. Certification

The undersigned certifies that, to the best knowledge and belief of the undersigned, 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.

Sincerely,

Kurt R. Karst