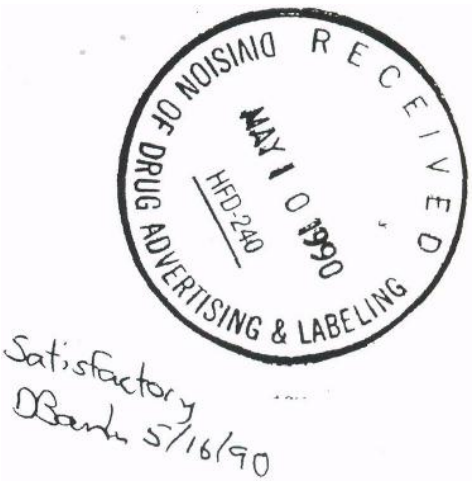
TAP PHARMACEUTICALS INC.

Bannockburn Lake Office Plaza
2355 Waukegan Road
Deerfield, Illinois 60015

May 4, 1990




Division of Drug Advertising and Labeling, HFD-244
Document Control Room 10B-04 Food and Drug
Administration 5600 Fishers Lane Rockville, MD 20857

Attention: Kenneth Feather, Acting Director RE:

RE: L**upron/Notice of Adverse Findings**

Dear Mr. Feather:

This letter is in response to your Notice of Adverse Findings dated March 21, 1990, addressed to Mr. Pietraszek, regarding alleged promotion of unapproved uses of Lupron® (leuprolide acetate injection) and Lupron Depot® (leuprolide acetate for depot suspension). I acknowledge a previous letter we received on this topic dated April 17, 1990, and reference meetings held with the division on April 6, 1990, and again on April 16, 1990.

TAP Pharmaceuticals Inc. has instructed its sales force, in writing, to destroy all copies of personalized letters to doctors, personalized sales aids, medical reprints and abstracts, brochures including innovators of GnRH Agonist Research and REACH (Reproductive Education and Choices for Health), physician listings, medical necessity letters and business cards bearing the name Lupron or GnRH analog that are in their possession. At the national sales meeting attended by all sales and medical personnel, it was reiterated that any materials they had must be destroyed so that they would not be able to detail Lupron to obstetricians and gynecologists with any printed material. Furthermore, they were instructed not to initiate any discussion of Lupron with obstetricians and gynecologists.

As explained in the meeting of April 6th, 1990, TAP sales people are properly detailing Ogen® (estropipate tablets and vaginal cream, USP) and various test kits for Abbott Laboratories to obstetricians and gynecologists. They will continue to do so.

In your letter of March 21, 1990, you reference photographs showing a booth used at the American Fertility Society meeting in 1989. The use of this booth by TAP Pharmaceuticals was done in good faith since it conformed exactly to that in our agreement of November 8,

1988, allowing the use of said booth. However, in our meeting of April 6, 1990, you rescinded approval to use that booth, and we have conformed to your pronouncement by canceling all further use prior to approval of Lupron Depot for the treatment of endometriosis.

In your letter of March 21, 1990, you also cite the distribution of the American Fertility Society revised classification of endometriosis as promotional labeling. This piece, as you were shown, was not intended to be, and clearly is not, promotional and contains no claims or any mention of Lupron. It is merely a form used by physicians to indicate the severity of the disease and was distributed to them as a gesture of good will. We have, on your recommendation, stopped any distribution of that or other physician's forms until Lupron is approved for a gynecological claim.

Your letter of March 21, 1990, discusses at some length patient-directed promotion of unapproved uses of Lupron with regard to the brochures prepared by REACH. As indicated in our letter of November 30, 1989, we have stopped distribution of these brochures and have not disseminated that brochure since our agreement. As indicated earlier in this letter, TAP has instructed its sales force, both in writing and verbally, to destroy all materials which might reasonably be interpreted as improper promotional material.

In our meeting of April 16, 1990, we discussed our desire to support three independent symposia on GnRH analogs for gynecological indications. Your letter dated April 17, 1990, indicated that we may not continue to do so. As a show of good faith on our part, we have canceled support of these symposia even though we hold that they are a true exchange of scientific information, and we believe that you agree.

You also asked for our agreement to provide for the agency's preclearance of all promotional activities for Lupron including promotional activities for our approved claims in prostate cancer. We are not aware of any fatalities or serious injury that would require prior approval under section 202.1 (j)(1) etc., but in the spirit of cooperation we will provide you with such materials prior to their use in promoting Lupron for prostate cancer.

As requested, we agree to submit a summary of information regarding any future scientific/educational activity for unapproved uses of Lupron.

TAP is prepared to respond in writing or to meet with you to discuss any additional specific activities which you have reason to believe are either direct or indirect participation in or funding of presentations for unapproved use of Lupron.

I trust the issues raised in you Notice of Adverse Findings have been addressed to your satisfaction. If any points need further clarification, please do not hesitate to contact me.

Sincerely,
Dean *P. Sundberg*


Director, Regulatory Affair
(708)317-5780

DPS/lms

cc: Mr. David Banks

TAL/DPS-5/1 -LupronAdverse