HFL 570 A. and

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 20-929

6/4/01

AstraZeneca
P.O. Box 8355
Wilmington, DE 19803-8355

Attention: Eric Couture, Ph.D.
Director, Regulatory Affairs

WRITTEN REQUEST
Amendment #3

Dear Dr. Couture:

Reference is made to the FDA's December 14, 1998, Written Request for pediatric studies for budesonide, and to the FDA's December 22, 1999, and May 22, 2000, amended Written Requests.

Reference is also made to your submission dated February 2, 2001, which contains proposed revisions to your pediatric protocol submitted on June 7, 2000, to IND 44,535, and to the subsequent teleconference between representatives of AstraZeneca and the Division of Pulmonary and Allergy Drug Products on March 6, 2001.

As a result of the March 6, 2001, teleconference we are amending the below-listed sections of the written request. All other terms stated in our Written Request issued on December 14, 1998, and the amendments dated December 22, 1999, and May 22, 2000, remain the same.

Entry Criteria:

Study 1: Children between the ages of 6 months and one year with asthma or asthma-like signs and symptoms who are likely to benefit from inhaled corticosteroids. The subjects should not have received systemic corticosteroids for at least 4 weeks and should have a normal baseline test of HPA-axis function, either cosyntropin stimulation test or another sensitive test of adrenal function such as timed or overnight urinary cortisol. Subjects who have received inhaled corticosteroids likewise may be recruited; however, they must undergo a minimum of a 2-week "washout" prior to entry into the trial. They also must have a normal baseline test of HPA-axis function, as specified above.

Age Group in Which Studies Will be Performed:

Study 1: Children between the ages of 6 months and 1 year. Approximately half of the study subjects in each study group must be below 9 months of age.

Reports of the studies that meet the terms of the Written Request dated December 14, 1998, as amended on December 22, 1999, and May 22, 2000, and by this letter must be submitted to the Agency on or before July 31, 2002, in order to possibly qualify for pediatric exclusivity extension under Section 505A of the Act.

Please submit protocols for the above studies to an investigational new drug application (IND) and clearly mark your submission, "PEDIATRIC PROTOCOL SUBMITTED FOR PEDIATRIC EXCLUSIVITY STUDY" in large font, bolded type at the beginning of the cover letter of the submission. Please notify us as soon as possible if you wish to enter into a written agreement by submitting a proposed written agreement. Please clearly mark your submission, "PROPOSED WRITTEN AGREEMENT FOR PEDIATRIC STUDIES" in large font, bolded type at the beginning of the cover letter of the submission.

Reports of the studies should be submitted as a supplement to your approved new drug application with the proposed labeling changes you believe would be warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "SUBMISSION OF PEDIATRIC STUDY REPORTS – PEDIATRIC EXCLUSIVITY DETERMINATION REQUESTED" in large font, bolded type at the beginning of the cover letter of the submission and include a copy of this letter. Please also send a copy of the cover letter of your submission, via fax (301-594-0183) or messenger to the Director, Office of Generic Drugs, HFD-600, Metro Park North II, 7500 Standish Place, Rockville, MD 20855-2773.

If you wish to discuss any amendments to this Written Request, please submit proposed changes and the reasons for the proposed changes to your application. Submissions of proposed changes to this request should be clearly marked "PROPOSED CHANGES IN WRITTEN REQUEST FOR PEDIATRIC STUDIES" in large font, bolded type at the beginning of the cover letter of the submission. You will be notified in writing if any changes to this Written Request are agreed upon by the Agency.

We hope you will fulfill this pediatric study request. We look forward to working with you on this matter in order to develop additional pediatric information that may produce health benefits to the pediatric population.

If you have any questions, contact Mrs. Gretchen Trout, Regulatory Project Manager, at 301-827-1058.

Sincerely,

{See appended electronic signature page}

John K. Jenkins, M.D.
Director
Office of Drug Evaluation II
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

John Jenkins
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