Draft Guidance on Felbamate

This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the Office of Generic Drugs.

Active Ingredient: Felbamate

Dosage Form; Route: Suspension; oral

Recommended Study: One study

Study Design: Multiple-dose, two-way, steady-state crossover in-vivo

Strength: 600 mg/5 mL

Subjects: Male and non-pregnant female epilepsy patients already

established on felbamate monotherapy or adjunctive therapy. The patients to be enrolled in the study should already be on a stable mono- or adjunct therapy regimen and this regimen should not

change for the duration of the study.

Additional Comments:

- 1. Steady-state felbamate plasma concentrations can be confirmed by obtaining at least three consecutive measurements of plasma felbamate concentrations prior to dosing. Concentrations should be obtained at the same time each day.
- 2. Patients who receive 600 mg of felbamate three times per day (1800-3600 mg/day in three divided doses) would be eligible for the study by continuing their established maintenance dose. Dose should be included in the Analysis of Variance (ANOVA) statistical model. Dose normalization is not recommended.
- 3. No washout period is necessary between treatment periods.

Also consider the following additional safety monitoring:

- 1. If any evidence of bone marrow (hematologic) depression occurs, felbamate treatment should be discontinued and a hematologist consulted to ensure appropriate medical care.
- 2. Additional criteria for exclusion from the study relative to baseline:
 - a. two-fold increase in the highest, 2-day pre-study seizure frequency,
 - b. single generalized, tonic-clonic seizure if none occurred during pretreatment screening, and/or,
 - c. significant prolongation of generalized, tonic-clonic seizures.

Analyte to measure (in appropriate biological fluid): Felbamate in plasma

Bioequivalence based on (90% CI): Felbamate

Waiver request of in-vivo testing: Not Applicable

Dissolution test method and sampling times: The dissolution information for this drug product can be found on the FDA-Recommended Dissolution Methods web site, available to the public at the following location: http://www.accessdata.fda.gov/scripts/cder/dissolution/. Conduct comparative dissolution testing on 12 dosage units each of all strengths of the test and reference products. A dosage unit for a suspension is the labeled strength (5 mL). A total of 12 units from 12 different bottles should be used. Specifications will be determined upon review of the application.