

1 have an adverse event over the course of one year  
2 trial is something we routinely see in any studies,  
3 including pharmaceutical agents.

4 The adverse events were divided into three  
5 groups to help us try and understand them better.  
6 One's that were associated with the surgical  
7 procedure, those that were associated with the device  
8 and those that were associated with the stimulation  
9 itself when you turned on or turned off the  
10 stimulator. Next, please. So with respect to those  
11 that were associated or attributed to the surgical  
12 procedure, the most frequently reported events were  
13 confusion, intracranial hemorrhage and infection. The  
14 events resolved in most patients.

15 I can tell you and I'll show you a slide  
16 in a moment, but I believe there were five or six  
17 patients that ended up with residual neurologic  
18 disability. And I'll show you those and describe them  
19 in a moment. I will also show you that these event  
20 rates are consistent with other stereotactic  
21 procedures in this type of patient. So here you can  
22 see the results of what was seen from our point of

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1 view. We considered the intracranial hemorrhage to be  
2 the most important. It occurred in 11 patients.

3 I point out there were 159 patients who  
4 were in the study, but that they had 301 procedures,  
5 so one could consider it from that point of view as  
6 well. We've shown the percentages as related to  
7 patients, but in the literature much of the data  
8 relates to procedure, with people having just  
9 unilateral events. Other problems were infection,  
10 dysarthria, thinking abnormal, headache and  
11 convulsions.

12 Most of the convulsions really were in the  
13 group that had the intracranial hemorrhage and as  
14 indicated most of those have resolved. Next, please.  
15 I just want to spend a moment on hemorrhage because we  
16 consider that to be an important issue. Hemorrhage  
17 was reported in 11 patients, 6.9 percent. But as I  
18 indicated, only in 3.7 percent of procedures. It was  
19 reported as a serious adverse event in only seven of  
20 the 11 patients, and interestingly it occurred at only  
21 a small number of Centers.

22 Three of 105 or 2.9 percent were in the

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1 group that had subthalamic nucleus and four or 7.4  
2 percent were in the group that had GPI. We did not  
3 see any evidence that implanting STN was associated  
4 with increased risk in comparison to GPI as has been  
5 alleged by a previous correspondent. The hemorrhages  
6 were seen in six, of the serious ones, six bilateral  
7 and one unilateral procedure. And interestingly, two  
8 of the patients were taking lisuride, which is a  
9 dopamine agonist that has anti-coagulant properties  
10 that had not been appreciated at the time, and may  
11 have played a role in their development of hemorrhage.

12 We now recommend that patients not use  
13 lisuride in the future. And lisuride, by the way, is  
14 a drug that's not available in the United States, so  
15 these were European samples. Of these 11 hemorrhages,  
16 of which seven were serious, four ended up with  
17 patients having persistent neurologic deficits. So  
18 all of the others cleared. Five of the serious seven  
19 were subcortical in location.

20 One was within the subthalamic nucleus and  
21 one was subarachnoid. So those were the locations.  
22 And this is just some data from Ron Tasker, who looked

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1 at this thalamotomy data and thalamotomy studies and  
2 pointed out that 1.5 to six percent of procedures had  
3 hemorrhage in the thalamotomy group. So not a lot  
4 different than what we saw. And in the Aactiva Tremor  
5 Control Therapy study in which we do DBS of the VIM  
6 nucleus, which is currently approved, four percent  
7 have hemorrhage. So again, not too much different  
8 from what we saw in this study. Next, please.

9 With respect to adverse events that were  
10 attributed to the device, you can see them listed  
11 here. Intermittent continuity is a classification  
12 term and it refers to the fact that a lead that was  
13 working stopped working or it then started again or  
14 stopped working and didn't start again. And in two  
15 cases that was reported to be serious. There was lead  
16 migration that was considered serious in six cases.

17 Other problems included infection which  
18 was considered to be serious in four. I think that  
19 these results were considered to be consistent with  
20 what had been seen with the Aactiva Tremor System or  
21 DBS VIM. And I think on the next slide you can see  
22 that because of these problems, eight patients had to

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1 undergo device revisions of one sort or another. With  
2 respect to infection, you can see that of the entire  
3 159 patients, 15 had infection. This was slightly  
4 higher rate than what was seen with the DBS Tremor  
5 System and may reflect the fact that these are longer  
6 procedures and that some people left the device  
7 explanted for as long as weeks before they implanted  
8 the IPG.

9 In the majority of instances, these  
10 resolved and here are some data from other surgical  
11 techniques showing what their infection rate was.  
12 Five percent with spinal cord stimulation, 5.7 percent  
13 is sacral nerve stimulation and 1.5 to six percent in  
14 CSF shunts. So infection rate is more or less in the  
15 same range as what's been seen with other procedures  
16 that are currently available. Next, please.

17 With respect to stimulation, it's  
18 difficult to gather information and a lot depends on  
19 how the evaluators judge it. The reason is that when  
20 you're trying to tune up the stimulator, what many of  
21 us will do is deliberately try to induce some kind of  
22 side effect, like paresthesia or muscle twitching in

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1 order to know how high we can go. And then we'll  
2 adjust at each electrode configuration. So there was  
3 variability, I suspect, in how people reported whether  
4 that was an adverse event or not.

5 I think the important thing from our point  
6 of view is that these are all typically mild and well  
7 tolerated by the patient, for the most part, and what  
8 characterizes the Activa System is that by adjusting  
9 the stimulation parameters one is able to control  
10 these in virtually all instances. So the ones that  
11 were reported in more than five are listed here and  
12 include dysarthria, dyskinesia, dystonia, paresthesia,  
13 etcetera. But again, I want to emphasize that you can  
14 make any patient have an adverse event as you  
15 stimulate, what matters is how many persisted and were  
16 problematic. And the answer there was virtually none.  
17 Next, please.

18 During the course of the study, three of  
19 the 159 patients died. None of these were attributed  
20 to study participation. One died with what was  
21 reported to be worsening Parkinson's. One of a  
22 suspected myocardial infarction. And one with cancer

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1 of the esophagus. Persistent neurologic disability  
2 occurred in eight patients. Five of these reported  
3 hemiplegia, four of these were from the hemorrhage  
4 group I described, and one patient had an independent  
5 hemiplegia.

6 Two patients were thought to have had  
7 cognitive decline over the course of the study and one  
8 had persistent dysarthria. Those were the patients in  
9 the study that had persistent neurologic deficits.  
10 Next, please. So we conclude that the adverse  
11 experiences that occurred in the course of this  
12 investigation are of a type and of a frequency that  
13 can be seen with other stereotactic neurosurgical  
14 procedures. And a summary of a number of different  
15 articles is provided here. You can see that in our  
16 study about 8.2 percent have confusion, whereas in  
17 ablative procedures it's four to ten percent of the  
18 studies are recorded.

19 Hemorrhage was seen in 6.9 percent, four  
20 percent serious, and again with ablative procedures as  
21 reported in 1.5 to 12 percent. Infection, as I  
22 mentioned, was a little higher than what's been seen

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1 in other procedures for the reasons I've given you.  
2 Dysarthria was about five percent. Most of the  
3 ablative procedures are unilateral. With bilateral  
4 it's typically much higher. Cognitive deficits,  
5 seizures and mortality are all more or less in the  
6 same range as what's been seen with other surgical  
7 procedures of this type. Next, please.

8 In contrast, the kinds of benefits that  
9 we've seen in this study and that I've shown you  
10 include the fact that deep brain stimulation of the  
11 subthalamic nucleus and GPI improve motor features,  
12 they reduce the motor complications resulting from  
13 levodopa, the increase on-time without dyskinesia and  
14 they decrease off-time. They allow patients to regain  
15 independence in performing activities of daily living.  
16 They allow most STN patients to reduce the dose.

17 They reduce disability as determined by  
18 both physician and patient, and the treatment has the  
19 advantage that it's reversible and any stimulation-  
20 related side effects can be eliminated by adjusting  
21 stimulation to meet the individual needs of the  
22 patient. I just want to show you this more or less

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1 final slide, because I think it is important to put  
2 what I've described for you into context. These  
3 patients that we've entered into the study are  
4 typically patients who have failed on medical therapy.

5 These are patients who have advanced  
6 Parkinson's Disease and cannot be further improved  
7 with the best of medical therapies that we currently  
8 have available. Now in comparable studies in  
9 advancing Parkinson patients, but not nearly of this  
10 level of severity, drugs that are currently approved  
11 offer the falling level of improvement in on-time in  
12 the case of Entacapone or Comtan, 0.6 to 1.4 hours per  
13 day in the studies that were pivotal for FDA approval.  
14 In the case of Tolcapone, 1.7 to 2.9 hours per day and  
15 in the case of Mirapex or Pramipexole, approximately  
16 two hours per day.

17 What I want to emphasize is this is  
18 increase in on-time, but with no adjustment for  
19 whether that on-time was complicated by dyskinesia.  
20 And I can tell you that in any Parkinson patient I can  
21 give them more on-time by just increasing the dose of  
22 levodopa, but then they'd have dyskinesia. Here you

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1 see the magnitude of improvement that was obtained  
2 with GPI and STN stimulation, 5.5 to 7.7 hours and 6.8  
3 to 7.3 hours, between three and five times higher than  
4 other approved agents in a population that can no  
5 longer be improved with these agents and in a  
6 population where this improvement is not just in on-  
7 time, but in on-time without dyskinesia. Next,  
8 please.

9 So at this point I think we want to just  
10 show the video one more time so that you could get  
11 another look at what we've been describing in this  
12 study.

13 (Video is showing.)

14 DR. OLANOW: Here then is that first  
15 patient. This would be the patient in medication-off,  
16 stimulation-off, unable to move, hardly able to turn,  
17 markedly compromised by his Parkinson's. And now  
18 medication-off, stimulation-on state, the stimulator  
19 is turned on. And the kind of benefit he experiences.  
20 Note that his on state is not complicated by  
21 dyskinesia. And here the <sup>\*\*</sup>second patient you saw in  
22 the medication-on, stimulation-off state.

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1       Experiencing the benefits of the drug, he is able to  
2       move.     But the movement is at a price, the  
3       corresponding involuntary movements.

4               And now medication-on, stimulation-on  
5       showing that his motor functions are more or less the  
6       same, but his dyskinesia has been very dramatically  
7       reduced. Can we go on to the next slide, please. So  
8       I would like to conclude this presentation and thank  
9       you for your patience in letting me give you such a  
10      lot of information. By telling you that in our  
11      opinion the Activa System deep brain stimulation has  
12      been clearly demonstrated to improve the feature of  
13      Parkinson's Disease in patients who cannot be  
14      satisfactorily controlled with medical therapy.

15              I want to emphasize to you, not being  
16      satisfactorily controlled was one of the criteria for  
17      being entered into this study and that in these  
18      patients, no drug that I have ever seen before has  
19      ever been able to provide these patients with the  
20      level of improvement that we see here, without the  
21      complicating complications that we've shown you. We  
22      believe that the therapy has an acceptable safety

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1 profile given that it is an intracranial surgical  
2 procedure.

3 And that the level and magnitude of  
4 improvement that is potentially available to these  
5 patients warrants this level of risk. And finally,  
6 conclude that at least with respect to stimulation,  
7 there is the additional advantage that the therapy is  
8 reversible.

9 CHAIRPERSON CANADY: Thank you very much.

10 DR. OLANOW: Thank you.

11 CHAIRPERSON CANADY: Ms. Pritchard, rather  
12 than present the lists of the people you have  
13 available for questions, why don't we ask the panel  
14 for questions and then as your people speak have them  
15 identified. I think that might be more useful to the  
16 panel. Questions from the panel?

17 DR. NUWER: One of the things that we  
18 really haven't covered is with the surgical  
19 implantation itself. Obviously the implantation has  
20 to be done very carefully by the right people with the  
21 right equipment and the right expertise. Could you  
22 comment further on how you would be able to assure

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1 that the right people with the right experience and  
2 the right equipment and the right monitoring are  
3 chosen to be able to do this? How can we protect that  
4 the patients are given implantations by the right  
5 people with the right equipment and the right help?

6 MS. PRITCHARD: Certainly as with the  
7 other devices that Medtronic has available and  
8 specifically the Activa Tremor Control Therapy,  
9 Medtronic does target only the Neurosurgeons who are  
10 experienced in the stereotactic procedures for  
11 implantation of this device, as well as Medtronic puts  
12 on many training sessions for the physicians. There  
13 is very comprehensive labeling and educational  
14 materials for the physicians, as well as all of the  
15 surgical staff that are involved in the surgeries to  
16 ensure that only the patients who have received  
17 appropriate training are implanting the systems.

18 DR. NUWER: Are you saying you would  
19 restrict the sale of these devices to the situations  
20 where the surgeons pass a certain criteria of  
21 training?

22 MS. PRITCHARD: Medtronic really doesn't,

1 we don't certify a patient, or a physicians for  
2 implantation, but when the physician expresses an  
3 interest in the product then we will provide the  
4 training that we have available.

5 DR. NUWER: So you're saying you provide  
6 the training. What would stop the surgeon from  
7 deciding he wants to go ahead and set up a program for  
8 doing this without having sufficient training?

9 MS. PRITCHARD: I can't say that there's  
10 anything that would stop them, but we discourage it.

11 DR. NUWER: How much experience with  
12 stereotactic surgery is needed before a surgeon really  
13 is ready to do this? How do you judge that?

14 MS. PRITCHARD: Okay, I guess I would like  
15 to have Dr. Andres Lozano, who is one of the  
16 Neurosurgeons involved in the study, answer that  
17 question.

18 DR. LOZANO: I'm Andres Lozano, I'm a  
19 Neurosurgeon at the University of Toronto and I  
20 specialize in stereotactic and functional  
21 neurosurgery. And Medtronic has paid my way to come  
22 here today and I'm a Consultant for Medtronic. There

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1 are currently 400 Neurosurgeons in the North America  
2 that are members of our professional society called  
3 the Society for Stereotactic and Functional  
4 Neurosurgery, the American Society. Of those,  
5 approximately 140 are involved in doing this type of  
6 functional neurosurgical procedure on patients with  
7 Parkinson's Disease.

8 And there have been already approximately  
9 140 Centers that have implanted DBS electrodes for  
10 tremor therapy. And so I think these are the Centers  
11 which will be first in line to offer this type of  
12 surgery. And I would hope that through the efforts of  
13 Medtronic and through the professional associations  
14 that the Centers with the most experience could then  
15 be used as resource centers to help train those  
16 Neurosurgeons that require some extra training in this  
17 field.

18 CHAIRPERSON CANADY: Is the society, the  
19 Stereotactic Society, a self-designated or are there  
20 admission criteria?

21 DR. LOZANO: The only admission criteria  
22 for the Society are you must be a Neurosurgeon with an

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1 interest in stereotactic and functional neurosurgery.

2 DR. NUWER: I guess my concern is not so  
3 much with those surgeons who are obviously well  
4 trained and have experience. The issue is with new  
5 people trying to enter the field and who might want to  
6 take advantage of being able to offer the service, and  
7 how does one assure that as new people enter the field  
8 that they have had the experience that's necessary to  
9 be able to do this safely?

10 MS. PRITCHARD: I guess, once again, I  
11 would just state that whenever a physician comes to  
12 Medtronic and requests a device or expresses interest  
13 in the therapy, then we will go through the different  
14 training opportunities that we do have available and  
15 we suggest that either they attend one of the  
16 Medtronic-sponsored training programs or visit with  
17 another physician that has experience in the  
18 procedures.

19 We also have videos available for the  
20 physicians that instruct on the surgical procedures.

21 CHAIRPERSON CANADY: Dr. Zamorano.

22 DR. ZAMORANO: Yes, I would like to, maybe

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1 would Dr. Lozano could comment on this. I'm a  
2 Neurosurgeon too and I perform many stereotactic and  
3 neurosurgical procedures. Now there are many people  
4 performing thalamotomies and we have the Aactiva Tremor  
5 approved for placement on the VIM. My opinion is that  
6 that is a relatively easy procedure to get into the  
7 VIM and do they give complication or do they give  
8 training to do that so a general neurosurgeon with a  
9 general training in stereotactics would be able to do  
10 that?

11 I have some concerns about subthalamic  
12 nucleus and GPI, globus pallidus, more concern  
13 actually with the subthalamic nucleus where I think  
14 you need a degree of expertise to get to that nucleus,  
15 I think to be very, very high. And I have concern  
16 that, you know, many people will have training to get  
17 to those nucleus. Could you comment on that, what is  
18 your opinion?

19 DR. LOZANO: This is in deed a novel  
20 therapy, a novel target, treatment, so there is a need  
21 to, for training, to learn how to do the techniques.  
22 The more training experience the surgeons have, I

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1 think the better the results and the better it will be  
2 for patients. As it stands now, the surgeons that are  
3 best poised, I think, to enter in this are exactly  
4 those that you mentioned. Those that have experience  
5 in doing certain type of functional neurosurgical  
6 procedures.

7 If they have experience in doing thalamic  
8 stimulation procedures then there is, it's not a very  
9 large step to embark on the globus pallidus and  
10 subthalamic nucleus. There is some training required,  
11 some acquisition of knowledge required, but I feel  
12 that this is within the realm of any well-trained  
13 neurosurgeon who has already some experience in doing  
14 functional neurosurgery.

15 CHAIRPERSON CANADY: Yes, Dr. Piantadosi.

16 DR. PIANTADOSI: Thank you. I have a few  
17 questions about the methodology of the study. Can you  
18 tell us was Dr. Olanow the principal investigator on  
19 the study?

20 MS. MCBANE: Good afternoon, I'm Laurie  
21 McBane. I'm an employee of Medtronic in their  
22 Clinical Research Activities. Dr. Olanow was one of

1 the principal investigators on the study.

2 DR. PIANTADOSI: And how many principal  
3 investigators were there?

4 MS. MCBANE: There were, well, there were  
5 18 Clinical Centers and I believe two of the Centers  
6 had shared PIs, so that would be 22 principal  
7 investigators.

8 DR. PIANTADOSI: I see. So there wasn't  
9 a single individual who took responsibility for the  
10 development of the protocol and the implementation of  
11 this study?

12 MS. MCBANE: Actually, Medtronic worked  
13 with a group of physicians to develop the protocol.  
14 I believe Dr. Olanow was one of the physicians, as  
15 were several of the European physicians. They worked  
16 with us to develop the study protocol and oversee its  
17 implementation.

18 DR. PIANTADOSI: One of the very unusual  
19 characteristics about the protocol was that it  
20 explicitly called for a sample size of ten patients  
21 per group augmented by three in case of drop outs, for  
22 a total of 26. That was stated repeatedly in the

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1 documents, explicitly in the reading material to the  
2 U.S. protocol. Repeated in the statistic section of  
3 the protocol and then again in the European protocol.  
4 And yet we're looking at data here of over 150  
5 patients. How did that happen?

6 MS. MCBANE: I would like to refer to my  
7 colleague, Teresa Nelson. Pardon me. The study was  
8 implemented in, under and IDE in the United States and  
9 it was also implemented at several European Centers.  
10 And the protocols, there were two versions of the same  
11 protocol that really stated the same patient  
12 enrollment criteria of the 13 patients in each patient  
13 group.

14 DR. PIANTADOSI: Yes, I understand, I've  
15 seen the protocols. And what I'm trying to figure out  
16 is how the sample size got from 26, perhaps times two,  
17 to 150?

18 MS. MCBANE: Well, you may recall from  
19 reading materials that there was an amendment to the  
20 European protocol to increase enrollment to increase  
21 enrollment to approximately 100 patients. And then  
22 the IDE protocol was implemented in one Canadian

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1 Center and two Australian Centers as well to add about  
2 30 patients to it.

3 DR. PIANTADOSI: And what was the level of  
4 awareness as to the data and discussions that were  
5 made about increasing the sample size? What  
6 interaction did the Agency have in this decision?  
7 Could you just describe a little bit of the thinking  
8 and circumstance that went into this?

9 MS. MCBANE: Well, in the United States  
10 the IDE was originally approved for ten patients. And  
11 we did request and receive approval from FDA to enroll  
12 26 patients. And I believe that was the nature of the  
13 discussion with FDA.

14 DR. PIANTADOSI: And what data were  
15 available at the time this was done?

16 MS. MCBANE: At the beginning of the  
17 study? I believe when we were requesting approval to  
18 expand the study from ten patients to 26 patients, we  
19 were just into implementing the study and about ten  
20 patients had been enrolled but it was in the early  
21 phases of their study participation.

22 DR. PIANTADOSI: Are the documents that

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1 are in the, I guess it's Volume 6 of the materials,  
2 the protocols, are they the original study protocol  
3 documents?

4 MS. MCBANE: Yes, yes, they are.

5 DR. PIANTADOSI: I notice that the  
6 European protocol had a date of March on the face  
7 page, but the pages themselves were dated in August.  
8 Is that the correct face page for that protocol?

9 MS. MCBANE: It is the face page that was  
10 available and we, there was a, use of the word  
11 processing software, the date of the printing of the  
12 first, the face page and the date of printing of the  
13 subsequent pages were printed on different dates --

14 DR. PIANTADOSI: I see.

15 MS. MCBANE: -- and that's what, the  
16 discrepancy.

17 DR. PIANTADOSI: And the U.S. protocol had  
18 no dates anywhere on it, as far as I can tell. Is  
19 that correct also?

20 MS. MCBANE: Individual pages weren't  
21 dated, however we do have a date of approval of the,  
22 and of submission of the IDE protocol to FDA.

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1 CHAIRPERSON CANADY: Dr. Hallett.

2 DR. HALLETT: I have several questions.  
3 One of the things in the protocol is that individual  
4 Neurosurgeons or PIs had a choice of GPI or STN. And  
5 it isn't completely clear to me how that decision was  
6 made by, for each individual patient. And when we  
7 finally get the final data, are there any differences  
8 by site or by investigator or by time during the  
9 course of the investigation as to which site was used?

10 And I suppose in the final analysis, what  
11 is the recommendation for site choice, given the way  
12 that the protocol was actually conducted?

13 MS. PRITCHARD: I'd like to ask Dr.  
14 Jerrold Vitek to respond to that question.

15 DR. VITEK: My name is Jerry Vitek, I'm a  
16 Neurologist at Emory University and I have no  
17 financial interest in Medtronic. They did pay my way  
18 to come here. This is an interesting situation with  
19 choice of sites, I think, because what happened  
20 initially is people who were first implanting thought  
21 that STN was a better structure for midlining symptoms  
22 such as gait, balance and freezing.

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1           And there was a feeling, a general  
2 feeling, not backed up by the scientific data, that  
3 GPI would be a better site for dyskinesia, I think  
4 partly based upon the study of pallidotomy, where  
5 pallidotomy is when you ablate that area so you reduce  
6 dyskinesia dramatically. All the data that we  
7 gathered don't really support one site or the other  
8 site for one symptom versus another.

9           So there's really no data that supports  
10 doing one site for this symptom versus another site  
11 for that symptom. What we see is we see efficacy for  
12 virtually all the symptoms across both sites. And  
13 from personal experience, I can tell you that we  
14 certainly haven't seen that with our randomized trial  
15 we've been conducting at Emory.

16           DR. HALLETT: Right, I mean one gets that  
17 impression from looking at the data. But I guess one  
18 of the questions I had is how did people decide then  
19 when they were actually enrolling the patient so that  
20 if there were patients that had dyskinesia they would  
21 be more likely to be GPI patients? And if they, I  
22 mean would that be the case, for example?

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1 DR. VITEK: I think that's true in some  
2 Centers. But there are other Centers where clearly  
3 people are more biased towards STN and most patients  
4 were implanted with STN, for example, in some of those  
5 Centers. So whether they had dyskinesia or not. And  
6 you can see from the data that a lot of patients the  
7 STN implants had dyskinesia to start with and they  
8 were improved after stim from the reduction of the  
9 dose.

10 So whether that is statistically  
11 significant across the Centers, I can't speak to that.  
12 I'd have to ask the Medtronic people to tell me if  
13 that's true or not. But I think, in general, you'll  
14 find a smattering of people with a variety of symptoms  
15 with both groups, both target sites.

16 DR. HALLETT: Okay.

17 CHAIRPERSON CANADY: Dr. Fessler.

18 DR. FESSLER: I'm just wondering why you  
19 specifically, not this necessarily for you, Jerry, but  
20 why did you specifically choose to use a non-  
21 parametric analysis rather than something like, for  
22 example, repeated measures analysis of variance?

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1 MS. NELSON: I'm Teresa Nelson, I'm a  
2 Contract Biostatistician and an employee of Medtronic,  
3 paid by Medtronic. We used a non-parametric method  
4 just to not make any assumptions about distribution.  
5 We have run the open-label, total motor exam data  
6 through repeated measures analysis and have found that  
7 the significant affects were medication, stimulation  
8 and then the interaction between medication and  
9 stimulation.

10 CHAIRPERSON CANADY: Dr. Walker.

11 DR. WALKER: A couple of questions about  
12 the dose response relationship. Certainly we've heard  
13 that at the high end of stimulation dosage because of  
14 current spread there are some untoward side affects.  
15 But given this is a very expensive device and given  
16 that it has to be surgically replaced as the battery  
17 is depleted, could you give us some information about  
18 dose response relationships at the low end with a view  
19 toward saving the patient's money and not having to  
20 replace the battery so often?

21 MS. PRITCHARD: Maybe if Dr. Olanow could  
22 come back and talk about that?

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1 DR. OLANOW: I think you've touched on a  
2 very important issue and one of the keys to trying to  
3 make this therapy practical is figuring out how to do  
4 the adjustment in an easy and effective and most  
5 practical way. In our group we have begun to approach  
6 this is a very systematic way. And the way we  
7 currently do it is for each possible retro-  
8 configuration. We look for the threshold that first  
9 induces benefit, the threshold that induces  
10 intolerable adversity.

11 And what we find is the best electrode  
12 configuration is the one that has the widest  
13 separation between the two that uses the lowest  
14 voltage which gets to your issue. We never go above  
15 3.6 or 3.7 volts, which I think is the doubler affect,  
16 so we keep under that. There is an issue with respect  
17 to battery life and how, and as you can see people are  
18 leaving the battery on 23, 24 hours a day.

19 Fortunately, no patient in this study in  
20 our group has yet run out of their battery, so we  
21 don't have real good data to give you and perhaps you  
22 have some information on how many people needed

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1 battery replacement. But we are very sensitive to  
2 trying to use the lowest voltage at the site that  
3 gives us the best result.

4 DR. WALKER: Is the electrode, all of  
5 these people have the same electrode design? Or were  
6 there two different electrode designs as variables in  
7 the study?

8 DR. OLANOW: There were two different  
9 electrodes that were used, but they were basically the  
10 same electrode. The only difference was in the  
11 spacing between the contacts.

12 DR. WALKER: Which speaks to the current  
13 density, which speaks to these issues?

14 DR. OLANOW: And again, I have no data to  
15 tell you what the difference in battery life is  
16 between them. I don't know if the company does. Do  
17 you? Do you happen to know how long the battery  
18 survives?

19 MS. PRITCHARD: No. I'll ask Lynn Otten,  
20 who is the principle Design Engineer on this product  
21 to answer that question.

22 MS. OTTEN: My name is Lynn Otten, I'm a

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1 Senior Principle Design Engineer for the Activa  
2 System. I'm employed Medtronic. I may be able to  
3 address your questions. Because of the variability of  
4 patients' requirements with the system, etcetera, I  
5 have a slide that I represented where I took the  
6 three-month average data of these patients. Because  
7 the parameters are based on whether they're bilateral  
8 or unilateral, what the impedance in tissue is,  
9 etcetera, we do have this problem.

10 Therefore I prepared this slide for you.  
11 Three volts which in STN in monopolar configuration  
12 with the high voltage of 3.0, to 3.0 volts, 85.4  
13 microseconds and 158.1 hertz over a 24-hour usage  
14 would have a 41-month average, which is 3.4 years.  
15 And the low point, to low voltage of 2.1 volts with  
16 75.6 microsecond and 138.4 hertz would run up to a 90-  
17 month average or 7.5 years.

18 In the GP you see very similar results in  
19 fact because of the voltage differences and usage  
20 differences we'd have from 35 months, which is 2.91  
21 years to 8.0 years. Again, it's highly dependent upon  
22 the individual patients and the requirements. Does

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1 this answer your question?

2 DR. WALKER: I think so, yeah.

3 MS. OTTEN: Thank you.

4 CHAIRPERSON CANADY: We're going to go  
5 back to Dr. Hallett, who I cut off, and then Dr.  
6 Edmondson.

7 DR. HALLETT: Sorry, I had four more  
8 questions. In the medication-on situation, did  
9 stimulation produce any significant benefit in any of  
10 the different parameters that were measured? That  
11 wasn't clear. Most of that was very close and most of  
12 the actual statistics we were given was from the  
13 med-off situation. So in the med-on situation, other  
14 than the on-time, which is a very important parameter  
15 obviously, was there any difference in any of the  
16 measured elements?

17 MS. PRITCHARD: We'd like to have Dr.  
18 Olanow speak to that.

19 DR. OLANOW: The results were not as  
20 dramatic but there were significant improvements with  
21 stimulation-on in the medication-on state in both  
22 groups. They weren't of the same magnitude. In the

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1 STN, I think, with off it was about 49 percent  
2 improvement and with on it was somewhere in the 20's.  
3 And with GPI, both, I think about 38 percent in the  
4 off, and I need the left-hand one too, to be equal to  
5 that. And --

6 DR. HALLETT: So that would be the  
7 difference on that slide in the two red dots?

8 DR. OLANOW: Exactly.

9 DR. HALLETT: And that was in fact  
10 statistically significant --

11 DR. OLANOW: That's correct.

12 DR. HALLETT: -- the two red dots?

13 DR. OLANOW: That's correct. Could you  
14 give me the equal? So the medication-on it was nine  
15 to 31 percent improvement in comparison to pre-implant  
16 and in comparison to the same medication-off, stim-  
17 off, the same visit. And those were each significant  
18 at P less than .005.

19 DR. HALLETT: Right, but that's, that's in  
20 comparison to the pre-implant state and to the  
21 stimulation-off state. But what I'm asking is in the  
22 on state of medication, on and off stimulation, which

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1 is the comparison with the two --

2 DR. OLANOW: Yes, that's with that same  
3 one. I may have worded it improperly, but it's  
4 medication-on, stim-on is significantly better than  
5 medication-on at baseline and medication-on, stim-off  
6 at each visit. And each of those --

7 DR. HALLETT: I see.

8 DR. OLANOW: -- is P less than .005.

9 DR. HALLETT: Okay. Right. The second  
10 question is in regard to postural instability as one  
11 of the individual factors in which was claimed that  
12 there was no, in which there was no difference. I  
13 don't think that's clear, that there was not any  
14 significant difference with postural instability?

15 DR. OLANOW: There was for us.

16 DR. HALLETT: Okay. How about with  
17 respect to freezing, was that particular element  
18 looked at?

19 CHAIRPERSON CANADY: We need you to come  
20 to the microphone to answer questions. This is  
21 getting transcribed.

22 DR. OLANOW: This is going to get me in

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1 shape.

2 CHAIRPERSON CANADY: There are all these  
3 empty chairs there. Come on now.

4 DR. HALLETT: We just want to get you some  
5 exercise, Warren.

6 DR. OLANOW: Okay, but just to answer your  
7 first point, postural instability was not improved  
8 with GPI but it was improved with STN.

9 DR. HALLETT: And that's in the  
10 medication-on?

11 DR. OLANOW: That was in the medication-  
12 off state, medication-off, stimulation-on.

13 DR. HALLETT: Right, but again, what I'm  
14 talking about is the medication-on, stim-on and off.

15 DR. OLANOW: I don't know that I know the  
16 cardinal features --

17 MS. MCBANE: I would like to bring up  
18 slides E-15 and E-16, please? Slides E-15 and E-16.  
19 Okay, this is looking at the freezing scores for  
20 patients with, receiving GPI bilateral stimulation at  
21 the six and 12-month visits in the off time there was  
22 a significant improvement at six months. I apologize,

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1 I can't quite see the p-value for 12 months. I think  
2 it's borderline significant.

3 And in the on assessment of freezing the  
4 results were not significant when comparing follow up  
5 to baseline. E-16 should have the same results for  
6 STN stimulation and this is for bilateral STN  
7 stimulation. Significant improvements during off  
8 periods as well as during on periods when comparing  
9 follow up to baseline.

10 DR. HALLETT: All right. Thank you. The  
11 next question is in relation to unilateral STN  
12 stimulation, almost all the data that you presented  
13 this morning, at least, was with respect to bilateral  
14 stimulation. With respects to unilateral stimulation,  
15 particularly in the STN, I wonder where there was any  
16 problem with that? My understanding is that that can  
17 lead to significant difficulties because of  
18 asymmetries, particularly given the fact that the dose  
19 has to be lowered.

20 So could you, could someone comment about  
21 unilateral STN procedures?

22 MS. PRITCHARD: And I will call on Dr.

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1 Jerrold Vitek again.

2 DR. VITEK: One of the issues there, I  
3 think, is that there is only five patients done  
4 unilaterally with STN, so there is no statistical data  
5 that we can provide. I can tell you based on my  
6 experience from doing it that there may be some  
7 patients that you do one side, in fact a patient that  
8 was in this trial, we did one side and had to reduce  
9 his doses. And we needed to then to go to the second  
10 side more quickly, because by reducing the dose to  
11 stop the stimulator side we went off on the other side  
12 and so we were forced to implant earlier than we  
13 wanted to.

14 But I can also say there is an equal  
15 number of patients who after implantation on one side,  
16 we've had good benefit. That's not to say that those  
17 patients aren't better with the bilateral stimulator,  
18 they are. But they can certainly do well with  
19 unilateral implantation, we're not forced to rush in  
20 to doing a second side, for example. There's a  
21 variable based on the patients.

22 CHAIRPERSON CANADY: Dr. Edmondson.

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1 DR. HALLETT: Sorry, one last question.  
2 One last one. That is that the target was clearly STN  
3 or GPI, yet there's a certain mention of GPE as being  
4 the target in a number of circumstances. And was that  
5 an error or, in terms of localization or was that by  
6 design? Because it wasn't formally part of the  
7 protocol?

8 MS. MCBANE: One patient had been reported  
9 to Medtronic as receiving a bilateral pallidal system  
10 implant. One side being internal globus pallidus, the  
11 second side being the external globus pallidus.  
12 However, that was an error in reporting from the  
13 investigator. So, in summary, no patients received  
14 stimulators in the external globus pallidus.

15 DR. HALLETT: So all of those were errors  
16 made by the, how many cases were there? Was there  
17 just one?

18 MS. MCBANE: One patient, right.

19 DR. HALLETT: One in the entire study?

20 MS. MCBANE: Yes, yes.

21 DR. HALLETT: \*\* I see. I had the sense  
22 reading it that it was more, but perhaps it was

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1 mentioned more often. So was that an error then of  
2 the surgeon in making the placement? Was that the --

3 MS. MCBANE: It was an error in  
4 documentation on the case report form.

5 DR. HALLETT: Oh, so it actually was GPI?

6 MS. MCBANE: Correct, correct.

7 CHAIRPERSON CANADY: Is that it?

8 DR. HALLETT: Yes.

9 CHAIRPERSON CANADY: Dr. Edmondson.

10 DR. EDMONDSON: Three years ago there was  
11 some concern raised by the panel regarding bilateral  
12 stim for VIM with regards to morbidity. It was raised  
13 by some of our panel members that there was some  
14 concern regarding cognitive dysfunction, dysarthria,  
15 a variety of other potential ill effects. We now have  
16 data, of course, of numerous patients implanted  
17 bilaterally in the STN and also in the globus  
18 pallidus.

19 There seem to be a preponderance more for  
20 the STN stim than for globus pallidus stimulation  
21 bilaterally. I was wondering if the Neurosurgeons  
22 could give us an idea if a breakdown of some of these

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1 side effects seen with bilateral stim? I notice that  
2 in some of the material we had a chance to peruse in  
3 preparation for this meeting that, for example, on  
4 patient went berserk on the table during bilateral  
5 stim simultaneous implantation, same day, and a couple  
6 of other patients have had some cognitive behavioral  
7 problems.

8 In fact, some attempts to implant  
9 bilaterally ended up with some abortion of the  
10 procedure entirely. So my question is this, let me  
11 just try to crystalize this. Number 1, the breakdown  
12 in terms of whether or not separating the bilateral  
13 implantation into two separate session if there is  
14 some evidence that separating it rather than doing it  
15 same session lessens the side effect? That's one  
16 concern.

17 The other is whether or not even though  
18 there is more data for STN than there is for globus  
19 pallidus stimulation, whether or not bilateral stim in  
20 one group versus the other is more likely to cause  
21 some of these side effects? And the third question is  
22 more related to how long the stim is externalized if

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1 there is some sense of how long you would recommend,  
2 what's the outer most time course before internalizing  
3 the device to limit infection rate?

4 MS. PRITCHARD: I'll ask Dr. Steven  
5 Wilkinson to address your questions.

6 DR. WILKINSON: My name is Steven  
7 Wilkinson, I'm a Neurosurgeon at Kansas University.  
8 I'm a Consultant to Medtronic. My trip here was paid  
9 for. I also have ownership in the corporation that  
10 had licensed technology to Medtronic, but in a  
11 different application. I might have to ask you again  
12 to go through those three points, but I think from the  
13 first one for the bilateral implantations, when we  
14 originally, from our own experience, when we  
15 originally started to do the implants, we would do  
16 them as staged procedures.

17 But as time has gone on, we are doing them  
18 now as simultaneous bilateral lead implants with the  
19 leads externalized and then implant the pulse  
20 generators later. And I don't really think that there  
21 was a big difference in terms of those morbidities,  
22 whether they were staged procedures or whether they

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1 were bilateral simultaneous. I think there probably  
2 is a little bit higher incidence of confusion and some  
3 of the transient, perioperative morbidity in the  
4 bilateral patients, because you're obviously affecting  
5 both sides.

6 But for the most part those were  
7 transitory effects. In terms of the externalization  
8 of the device, obviously the shortest time possible is  
9 the best. I think that the longest that we've ever  
10 externalized a patient has been in the order of about  
11 ten days to two weeks. But I think that there have  
12 been other patients that have been externalized for  
13 longer periods.

14 DR. EDMONDSON: And in these patients who  
15 are extended out to over a week, are they on  
16 antibiotic prophylaxis the whole time?

17 DR. WILKINSON: Well, I can't speak to  
18 every Center, but in our Center yes they are on  
19 antibiotic prophylaxis.

20 DR. EDMONDSON: And breakdown for STN  
21 versus globus pallidus in terms of some of the  
22 neurocognitive side effects?

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1 DR. WILKINSON: I think that they were, at  
2 least in our experience, I think that they were equal.  
3 I don't think that one target is inherently more risky  
4 or dangerous than the other.

5 CHAIRPERSON CANADY: A final question from  
6 Dr. Massaquoi. Oh, you have one more?

7 DR. MASSAQUOI: Just quickly, I think  
8 there was some concern on the part of a statistical  
9 Consultant about the possibility of placebo effect  
10 affecting the randomized study data. And the question  
11 is for people who have an implanted stimulator, are  
12 they aware in general of effects aside from, well  
13 let's just say, what types of awareness might a  
14 patient have when the device is turned on versus  
15 turned off, let's say immediately when it's turned on  
16 versus turned off? And what effect that might have on  
17 a placebo effect in your study?

18 MS. PRITCHARD: I'll ask Dr. Erwin  
19 Montgomery to respond to that.

20 DR. MONTGOMERY: Good afternoon, I'm Erwin  
21 Montgomery. I'm a Neurologist at the Cleveland Clinic  
22 Foundation in Cleveland, Ohio. I have no financial

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1 interest in Medtronic. I am a Consultant whose time  
2 is being compensated for by Medtronic as well as my  
3 expenses. To answer your questions about the placebo  
4 effect, that certainly is an important consideration  
5 and multiple studies have shown that the placebo  
6 effect can be quite significant in patients with  
7 Parkinson's Disease.

8 But speaking as someone who has  
9 participated in numerous placebo-controlled clinical  
10 trials in Parkinson's Disease, I don't think I have  
11 ever seen any kind of, the magnitude of improvement  
12 that has been demonstrated in the presentations today  
13 and I'm sure my colleagues who have similar experience  
14 in placebo-controlled clinical trials would share that  
15 observation. Also, I do think though there are some  
16 pieces of data that have been presented that speak to  
17 the issue of placebo effect and that has to do with  
18 the three-month randomized study where patients were  
19 initially randomized to stimulator-on versus  
20 stimulator-off.

21 And in those two situations it was, and  
22 these patients did not know what the stimulator status

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1 was at that time, there were clear differences in the  
2 UPDRS as far as on the motor examination. So that  
3 certainly suggests that there was an effect that  
4 survived any placebo effect. Also I think the issue  
5 was raised earlier about a potential carryover effect  
6 from the first period stimulation to the off  
7 stimulation subsequently.

8 If there was in deed a carryover effect or  
9 a placebo effect, it wouldn't serve to lessen the  
10 degree of difference or the degree of improvement  
11 noted. And the fact that there were highly  
12 statistically significant differences in the results,  
13 I think is, speaks to the efficacy of the study. In  
14 other words, if there was a placebo effect I think it  
15 would have reduced the differences that we would have  
16 seen and made it harder to detect a difference.

17 And the fact that a difference was  
18 detected speaks to the efficacy. And then your next  
19 question about how much do the patients really know  
20 that the stimulator is on? As Dr. Olanow mentioned,  
21 patients very often will get transient<sup>\*\*</sup> paresthesia or  
22 transient, a funny feeling or something like that when

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1 the stimulator is first turned on. These are  
2 transient and typically are gone within a few minutes  
3 of having the stimulator turned on.

4 In fact, we did a study at the Cleveland  
5 Clinic where we would turn the stimulator on for the  
6 patient, we'd wait a period of time and then we'd  
7 either turn the stimulator off or leave the stimulator  
8 on and we would blind the patient as to that and ask  
9 them whether they could then guess whether they were  
10 on or off. And of the 15 patients that we studied,  
11 only one patient was able to reliably state that the  
12 stimulator had been continued on or had been turned  
13 off.

14 So again, these kinds of things are really  
15 transient. So once the stimulator is turned on,  
16 patients usually don't feel anything that would  
17 unblind them. In terms of turning the stimulator off,  
18 in our own experience, I've never seen any effect that  
19 a patient could never tell in terms of paresthesia or  
20 something like that, when the stimulator was turned  
21 off.

22 They certainly could tell when the

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1 stimulator was off because their Parkinsonian symptoms  
2 got markedly worse.

3 DR. MASSAQUOI: All right. In summary,  
4 then, is that part, is the randomized part truly  
5 double-blind or is it almost consistently not blind  
6 from the point of view of the patient. The patient,  
7 if at one time the stimulator is turned on, even if  
8 transiently, they are aware that the stimulator is now  
9 on. Is that generally the case?

10 DR. MONTGOMERY: Again, I was not the, I  
11 didn't participate in this investigation, but I can  
12 ask Dr. Olanow to speak to that issue.

13 DR. OLANOW: As in many double-blind  
14 studies it is hard to make them perfect. And it  
15 reminds me of the study we did with Comtan where there  
16 was discoloration of urine for people who took it and  
17 it does impair your ability to do a double-blind. So  
18 if some people experience paresthesia before they have  
19 their benefit, it potentially unblinds.

20 As of course, as Erwin has said, does the  
21 magnitude of improvement that they experience.  
22 Nonetheless, not all people experience this effect.

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1 We did everything we could to try and preserve and  
2 maintain the integrity of the blind. And I would like  
3 to just reinforce the point that Dr. Montgomery  
4 stated. That I've done lots and lots of double-blind  
5 placebo-controlled studies and we've actually reported  
6 on the placebo effect in our controlled studies and  
7 never have we seen anything of the magnitude that is  
8 obtained in this.

9 Not that that is necessarily reassuring to  
10 you, but it does speak to the kind of effect that  
11 these patients are experiencing.

12 DR. MASSAQUOI: I guess, and so when the  
13 statistical analyses were applied that you used, what,  
14 were they applied with the assumption of double-  
15 blindedness?

16 DR. OLANOW: Yes, they were and  
17 unfortunately we did not do a blindedness evaluation.

18 CHAIRPERSON CANADY: Dr. Cohen.

19 DR. COHEN: Yes, I have a few questions  
20 about how this technology might be applied to  
21 patients. One has to do with the qualifications and  
22 training of the physicians that would do this

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1 implantation. And Dr. Lozano, I believe, mentioned  
2 earlier that the Stereotactic Society does training  
3 or, my question is, is there any kind of certification  
4 mechanism that would get this society, professional  
5 societies could do to assure patients that they were  
6 getting well trained physicians?

7 And second of all, earlier Mr. Elliott in  
8 his presentation said that the professional  
9 associations provided information to patients. Would  
10 professional associations provide that information on  
11 who was trained or what kind of training they had?  
12 And with, another, maybe you could answer and then I  
13 could ask the other question?

14 MS. PRITCHARD: I'll have Dr. Lozano  
15 address your issues.

16 DR. LOZANO: So this is an important  
17 issue. With respect to these associations, I can  
18 think of two examples where associations or organized  
19 medicine have taken initiatives to try to address this  
20 issue. One is to publish guidelines. So for example  
21 recently several Neurologists and Neurosurgeons were  
22 involved in the assessment of surgical procedures for

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1 Parkinson's Disease in general. And this was done, a  
2 therapeutic assessment with the Academy of Neurology  
3 and there was an assessment of surgical procedures  
4 with guidelines as to what procedure should be done  
5 and how they should be done, what kind should be done.

6 So that's one initiative. Another  
7 initiative is within the neurosurgical stereotactic  
8 and functional neurosurgical community and the  
9 American Society. We have also, are working on  
10 guidelines for doing these procedures, what are the  
11 requirements that we recommend as a Society for doing  
12 these procedures. So these will be guidelines that  
13 will be published and available.

14 We don't have a policing function, but we  
15 simply establish these guidelines and say this is what  
16 we recommend.

17 DR. COHEN: Do you have an certification  
18 mechanism?

19 DR. LOZANO: No, there is no  
20 certification. The certification is just you are a  
21 neurosurgeon, that is a certification. You are  
22 certified as a neurosurgeon, within that you, you do

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1 whatever procedures you feel you are competent in  
2 doing.

3 DR. COHEN: As a patient, I wouldn't want  
4 somebody operating on me after they watched a  
5 videotape. And do any of the professional, the  
6 patient association provide this kind of information?

7 DR. LOZANO: No, I agree with you. We  
8 want these procedures to be done by experienced  
9 Centers, by people that are qualified. And you know,  
10 it's our job to ensure that that training is available  
11 and that patients have access to Centers that have the  
12 training and experience to do these procedures.

13 CHAIRPERSON CANADY: I'm going to ask for  
14 one more question. I would remind people that there  
15 will be an opportunity for these discussions later as  
16 well, this isn't the only shot.

17 DR. COHEN: Can I ask one last question?

18 CHAIRPERSON CANADY: Okay, Dr. Cohen.

19 DR. COHEN: This is on a different issue.

20 CHAIRPERSON CANADY: I'd rather wait on a  
21 different issue until later, if we could.

22 DR. COHEN: Okay.

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1 CHAIRPERSON CANADY: Because it is already  
2 1:00. Okay. We're going to break for lunch now at  
3 1:00, and you will return at 2:00. We will have at  
4 that time the FDA presentation. We will then have an  
5 opportunity for discussion and that includes an  
6 opportunity again to direct questions to the industry  
7 representatives.

8 (Whereupon, the foregoing matter went off  
9 the record at 12:55 p.m. and went back on the record  
10 at 2:05 p.m.)  
11  
12  
13  
14  
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18  
19  
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21  
22

1 A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N

2 (2:05 p.m.)

3 CHAIRPERSON CANADY: It's now 2:05 p.m.  
4 I'd like to call the meeting back to order. I would  
5 remind the public that while this meeting is open for  
6 public observation, public attendees may not  
7 participate except at the specific request of the  
8 panel.

9 We will now have the FDA presentations on  
10 PMA 9600009/S7 for the Medtronic, Inc., Activa  
11 Parkinson's Control System. The FDA presenter is  
12 Captain Marie Schroeder. She will be followed by Mr.  
13 John Dawson.

14 Captain Schroeder?

15 CAPT. SCHROEDER: Thank you. Good  
16 afternoon, everyone. My name is Marie Schroeder. I'm  
17 a Captain in the United States Public Health Service  
18 and a licensed physical therapist. And the other  
19 members of our review team are John Dawson who will  
20 also be talking right after me, and Robert DeLuca who  
21 is with us, but he won't be speaking, but he's  
22 available for questions.

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1 I wanted to thank everyone first of all  
2 for coming today to discuss this very complex, but  
3 important medical condition and I really thank you for  
4 all the attention. It's very obvious everyone is  
5 really taking a lot of effort to focus on all of the  
6 questions that have to be dealt with today. So thank  
7 you very much.

8 Okay, I just wanted to start off with a  
9 brief reminder of the original approval for the  
10 Medtronic Activa Tremor Control System was approved in  
11 1997 and there were certain conditions of approval at  
12 that time in order for that approval to go through  
13 which included further characterizing long-term safety  
14 and effectiveness, assessing neurotoxicity, assessing  
15 carcinogenicity, obtaining follow-up on mortality and  
16 autopsy information and evaluating patients following  
17 implantation of multiple leads and re-implantation of  
18 leads.

19 The study objectives for the studies that  
20 we are considering today for the new indications for  
21 use for this product are to <sup>\*\*</sup>define in the protocols as  
22 being to assess the safety tolerability and

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1 effectiveness of electrical stimulation of the  
2 subthalamic nucleus and the globus pallidus for the  
3 treatment of patients with advanced Parkinson's  
4 disease.

5 The scope of the study, the European study  
6 protocol calls for 26 patients at five investigational  
7 sites. This was amended in June of 1996 to call for  
8 50 patients per target site at ten centers because the  
9 low number, that is the 26, would not result in  
10 general clinical acceptance and therefore they wanted  
11 to increase the number in the study.

12 The U.S. study was approved for 10  
13 patients and three investigational sites originally  
14 and went on to be conditionally approved for 26  
15 patients at five investigational sites.

16 The study size of the Canadian and  
17 Australian studies, they used the IDE version so I  
18 assume that they were looking at 26 patients as well.

19 Study duration, they anticipated it would  
20 take about 18 months, the follow-up times, but that  
21 they would continue their study until their primary  
22 objectives were met and they would have follow-up

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1 times for patients at 1, 3, 6 and 12 months after  
2 implantation of the second deep brain stimulator  
3 because this was a bilateral study.

4 Inclusion criteria, I will only point out  
5 the sponsor already went over these. There was a  
6 discrepancy between the European IDE protocols in that  
7 the European called for two out of three cardinal  
8 features. The company has told us that most of the  
9 patients in the European study as well had three out  
10 of four symptoms.

11 We can go to the next slide. One of the  
12 other discrepancies in inclusion criteria were just in  
13 the wording regarding this one, absence of dementia  
14 and absence of psychiatric and hallucinations due to  
15 dopaminergic and anti-cholinergic therapy at least one  
16 month prior to surgery and you can see below the  
17 wording for the European protocol. Again, the sponsor  
18 addressed this in this last volume of your panel  
19 package.

20 Exclusion criteria, I'll just read through  
21 quickly: not anyone who was not determined to be a  
22 surgical candidate, people who had previous

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1 neurosurgical histories or withheld informed consent,  
2 those with demand pacemakers and patients who needed  
3 repeated MRIs, patients with a history of substance  
4 abuse, secondary or drug-induced parkinsonism,  
5 patients that had sustained depression with vegetative  
6 symptoms and suicidal thoughts or intent as determined  
7 by Part 1 of the UPDRS.

8 Trial design, again, there were two  
9 different protocols. They were similar, but did have  
10 some differences that were noted in the summary by the  
11 sponsor and in the last volume of your panel package.  
12 In the IDE version there were four centers in the  
13 U.S., two centers in Australia, one center in Canada  
14 and the European had 11 centers. They prospective,  
15 open-label designs for the most part. Both of them  
16 had the double-masked, randomized, crossover  
17 assessment on Day 2 of the 3-month follow-up only.

18 Pre-implant assessments, the open label  
19 assessments were conducted twice within one month of  
20 the anticipated impact. I believe most patients had  
21 that data averaged, but there were some patients it  
22 was not averaged.

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1           Implantation, bilateral implants were  
2 either implanted simultaneously or they were staged.  
3 There was no mention of how that decision was made in  
4 the protocols. Timing of the staging was to be from  
5 0 to 3 months from the time of the first impact. That  
6 was not the case in several patients. Several  
7 patients went longer than that.

8           The second implant could be canceled if  
9 there was concern for patient safety, there was a  
10 satisfactory result after one implant or the patient  
11 declined the second implant. A breakdown on the  
12 numbers of patients that received one implant for  
13 those different reasons is not available at this time.

14           The treatment schedule, according to the  
15 case report forms, the treatment could be applied  
16 continuously, during the day only, during the night  
17 only or some other schedule. The physician was to  
18 indicate that on the case report form and inform the  
19 patient.

20           Follow-up, the open-label assessments were  
21 done at 1, 3, 6 and 12 months after implantation of  
22 the second implant. Appropriate follow-up data was to

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1 be collected during the period between the implants.  
2 I did not see anything in the PMA that discussed that  
3 data, but may be available.

4 Randomized, double-blind assessments at  
5 the 3 month visit was done at Day 1, I'm sorry, at Day  
6 2 of the three month visit.

7 Patients that were not implanted or  
8 internalized were also to be followed at 1-month and  
9 6-months for safety purposes. Not all patients  
10 received those follow-ups. It's a little unclear  
11 quite how many that was. They were to follow the  
12 evaluations that were done for the pre-implant  
13 assessments.

14 The target sites were as we discussed  
15 earlier, -GP or -STN. There was not a defined  
16 algorithm or decision making instruction in the  
17 protocols. It was chosen at the discretion of the  
18 investigational center. Standard imaging and  
19 stereotactic techniques were used as you can see up  
20 there and optional use of micro-electrode recording  
21 techniques and stimulation techniques could be used  
22 and there were two different leads that could be

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1 implanted as was discussed earlier this morning.

2 Again, just a summary of the protocol  
3 defined a number of assessment measures for  
4 effectiveness. Form 5 was the patient diary  
5 information on motor fluctuations. There was a  
6 Sickness Impact Profile to be conducted. The Unified  
7 Parkinson's disease rating scale, UPDRS, the complete  
8 assessment. The Dyskinesia Rating Scale which was a  
9 modified Obeso scale. The objective assessment which  
10 included Step-gait and Tapping Speed and Form 10 was  
11 a subset of the UPDRS. It was Section 3, the motor  
12 exam. The European version did not actually have a  
13 separate piece of paper for the open label assessments  
14 that said Form 10. The third section of UPDRS was  
15 marked as Form 10. So Form 7 and 10 were merged.

16 Form 11 was the Global Assessment. Form  
17 12 was only for the U.S. protocol. It was clinical  
18 fluctuation assessment that was supposed to be done  
19 over a 6-hour period, however, that was the approved  
20 protocol in 1995. It was eliminated in 1998 and there  
21 was a videotaping done, \*\* but there was no form  
22 available for assessments of the videotape.

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1                   Now I'd like to talk just a little bit  
2 more about the effectiveness measures. At the  
3 randomized, double-masked, crossover assessment that  
4 occurred at 3 months, just for a reminder because it  
5 does get confusing as to the status of the patient  
6 during these assessments, for the 3-month, again,  
7 we're looking only at the meds off situation and they  
8 were compared and assessed at Stim OFF and Stim ON  
9 for these four assessments. The videotape, the motor  
10 exam, the objective assessments and the dyskinesia  
11 rating scale.

12                   The Dyskinesia Rating Scale, objective  
13 assessments and the motor exam was assessed at all  
14 four combinations of medicine, Meds ON, Meds OFF and  
15 Stim ON, Stim OFF.

16                   And just as a reminder on the next page  
17 the European version of the UPDRS, Sections 2, 5 and  
18 6, they assessed everything except the Stim OFF phase  
19 and therefore with these sections, you can't make any  
20 comparison between Stim OFF and Stim ON. And then for  
21 the sections 1 and 4, it<sup>\*\*</sup> also did not allow for  
22 comparison to Stim OFF.

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1                   It's a little unclear if you are looking  
2                   at the protocols and the case report forms, it's  
3                   unclear as to what the Meds Stim status and/or motor  
4                   fluctuation status was with these following ones, the  
5                   diary, the sickness impact profile, the IDE version of  
6                   the UPDRS, the pre-implant UPDRS motor exam for the  
7                   IDE version and the global assessments.

8                   Looking at primary effectiveness  
9                   endpoints, the sponsor defined as motor examination  
10                  portion of the UPDRS with Meds OFF/Stim OFF compared  
11                  to Meds OFF and Stim ON. It was to be double-masked,  
12                  of course, we talked earlier today about the masking  
13                  issues. It was randomized in crossover design and it  
14                  was done only 3-months after the last implant. It was  
15                  in the bilateral staged implants. It was done because  
16                  you did it after the last implant, it could have been  
17                  done as much as 6-months after the first implant.

18                  The second area of efficacy endpoints,  
19                  there were none specified in the protocols. Safety  
20                  endpoints, there were none specified in the protocols.  
21                  They did talk about monitoring safety.

22                  Case Report Forms, as far as the primary

1 endpoint, I just wanted to clarify that for the  
2 primary effectiveness measure done at the 3-month time  
3 point, the European Case Report Forms for the second  
4 evaluation had the wrong response options provided for  
5 tremor at rest, action or postural tremor of the hands  
6 and for rigidity. It occurred only on the second  
7 form, but by doing that, there was some potential for  
8 the patient to have no change in status and still look  
9 like they had improved or worsened.

10 The diary, just to point out the fact that  
11 it was nice that they recorded Meds dosage and times  
12 and ON/OFF times and ON times with dyskinesia, but  
13 they did not prompt the patient to indicate when they  
14 were using the stimulator or when they were not using  
15 the stimulator and since that was a variable schedule,  
16 that would have been nice to have.

17 Videotape, there were no accompanying  
18 forms the follow-up protocols were somewhat  
19 inconsistent with respect to the medication and  
20 stimulation status.

21 Concomitant therapies. The Parkinson's  
22 disease medications, the inclusion criteria in the

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1 protocols called for stable medications for one month  
2 prior to enrollment. Elsewhere in the PMA it  
3 described that during this study they should hold pre-  
4 operative medications constant throughout the study  
5 duration, although it may not be possible for all  
6 patients. The sponsors reported that most of the STN  
7 patients had medicines reduced.

8 The non-pharmacological therapies, there  
9 were no instructions. They were silent on that  
10 aspect.

11 Just in study masking, the 3-month visit  
12 again was supposed to be double masked. There is some  
13 question about the masking of the patients which does  
14 not seemed to have been monitored. It doesn't look  
15 like they assessed to see whether the patients were  
16 truly masked.

17 Next slide. Again, protocol definitions,  
18 the sponsor already went over, but I just wanted to  
19 point out that they're looking -- they were initially  
20 looking at this from Meds OFF to Stim ON -- or Meds  
21 OFF with Stim ON to Meds OFF with Stim OFF and it did  
22 not take baseline into account.

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1 Protocol definitions of success, also as  
2 far as it didn't specifically come out and describe  
3 individual patient success and failure. The safety  
4 information was not considered in the current  
5 reporting of overall whether the patient was a study  
6 success. And there was one example where at least one  
7 patient was defined as success based on the 3-month  
8 randomization motor scores, but if you look at 12-  
9 month visit they were terminated due to infection  
10 necessitating lead explanation.

11 Global measure of success was not included  
12 in their definition such as they had done this  
13 sickness impact profile and they also did a complete  
14 UPDRS which might have given a more comprehensive  
15 picture of the patient.

16 Assessment of the second implant as  
17 compared to what benefit did the second implant  
18 provide over the first implant was not discussed. And  
19 I point this out because there were at least two  
20 patients that were considered successes at 3-month  
21 time point, but later went on to get implants, but the  
22 reasons why they needed the second implant were not

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1 provided.

2 I'll just throw this up just as a reminder  
3 because this application has data from different data  
4 bases. The top one is looking at the 1998 data base  
5 closure. Most of the effectiveness assessments were  
6 done with that data. For instance, they start out  
7 with 95 bilateral STN patients and we have about 42,  
8 43 percent of those patients at 12-months. GP  
9 bilateral, we start out with 38 and there's about 22  
10 at the 12-month time point.

11 And then down at the bottom chart it's the  
12 1999 data. They have a lot more patients that they  
13 are reporting in their 1999 data base, but some of  
14 these assessments do not include those additional  
15 patients. Our statistician will talk about missing  
16 data in his presentation.

17 Just another piece of information. It was  
18 a little unclear or difficult to understand in the  
19 PMA, but after reviewing the data it looks like, if  
20 you're looking at attempt at lead implantations it  
21 looks like there were at least 13 attempts in 12  
22 patients that were a problem. Six of these individual

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1 attempts resulted in no implant in 5 patients. One  
2 was a bilateral attempt and 4 of them were unilateral  
3 attempts.

4 Four attempts resulted in 1 implant  
5 instead of 2 implants and that was in 4 patients and  
6 3 attempts of unilateral placement failed, but later  
7 received bilateral implants and that occurred in 3  
8 patients.

9 And additional 16 patients with successful  
10 unilateral implants were also reported. The reasons  
11 for not being implanted with the second device were  
12 not specified.

13 It appears that 6 out of the 159 patients  
14 enrolled had the second implant more than 3 months  
15 after the first implant which was a protocol  
16 deviation. They were considered unilateral for some  
17 effectiveness timepoints and they were considered as  
18 bilateral patients for other time points. So I'm not  
19 exactly sure how these mixed data with mixed  
20 unilateral versus bilateral stimulation were handled  
21 in the effectiveness analyses. The reason for the  
22 implant delay was not explained and the reason for the

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1 second implant when the 3-month assessment was deemed  
2 successful, it wasn't clear they went on to implant  
3 the second one, the second device.

4 Adverse events, the company looked at a  
5 number -- the safety in a number of different ways.  
6 They looked at overall summary of first occurrence of  
7 all adverse events reported by greater than or equal  
8 to 2 patients. They looked at deaths. They reported  
9 on other serious adverse events, the extent of  
10 exposure to implanted devices, adverse events by  
11 overall etiology, reliability and tolerability of the  
12 device.

13 This is just one of their -- the first  
14 page of listing of their overall occurrence of adverse  
15 events. The second column is total serious adverse  
16 events and then total ongoing adverse events and I'm  
17 just flashing them up there as a reminder that there  
18 are quite a number of adverse events that should be  
19 taken account, although as you can see, some of the  
20 numbers are low in occurrence.

21 87.4 percent or 139 out of 159 patients,  
22 of enrolled patients experienced 1 or more adverse

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1 event. 86.7 percent in the STN group; 88.9 percent in  
2 the GP group. The overall summary of first occurrence  
3 of all adverse events reported by greater than two or  
4 more patients. It only reports the first occurrence  
5 of the adverse event so we don't get a good feel for  
6 the frequency of the occurrence even within patients  
7 or the duration and interventions are not provided.

8 52.2 percent of the enrolled patients  
9 experienced one or more adverse, serious adverse  
10 events. 49.5 percent of the STN patients and 57.4  
11 percent of the GP patients. I just wanted to point  
12 out that the tables in the adverse events section list  
13 again only first occurrence and they report only on  
14 those that were experienced by equal to or greater  
15 than 2 patients.

16 Some patients were omitted from the  
17 tables, but you can find that information elsewhere in  
18 discussion, but in case you're just relying on tables  
19 I wanted you to know that there are some additional  
20 patients mentioned in the text, for instance, the  
21 subarachnoid hemorrhage is omitted. Hemiplegia is not  
22 listed as an adverse event and they do not reflect

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1 serious adverse events discovered during the  
2 statistical analyses that were determined after data  
3 base closure and the summaries lacked frequencies,  
4 durations and interventions.

5 Again, the sponsor has already discussed  
6 there were six patients who died, 3 during the 12-  
7 month period and 3 after. One in this 12-month period  
8 had end-stage Parkinson's disease as the reason for  
9 death and after the 12-month duration of the study one  
10 died of pneumonia related to Parkinson's disease.

11 I just wanted to discuss  
12 hemiplegia/hemiparesis. It was not listed in the  
13 tables, but it is discussed elsewhere in the  
14 submission. However, after reviewing the information,  
15 it appears that from the narratives, it seems to  
16 describe six cases of hemiplegia/hemiparesis, but only  
17 lists one under that heading hemiplegia. There's one  
18 listed under paralysis and there's five serious cases  
19 listed under asthenia. There are also four other  
20 hemiplegia cases that are listed under asthenia and  
21 one of them that's listed under asthenia seems to be  
22 a general weakness.

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1 Hemorrhages, there were 10 intracranial  
2 hemorrhages listed overall in the table. Six of them  
3 were reportedly serious. However, there was also a  
4 serious subarachnoid. One serious case of  
5 subarachnoid hemorrhage that was reported in a  
6 narrative, but not included in the table. I believe  
7 that the numbers from the sponsor this morning  
8 included that as an intracranial hemorrhage as well.

9 Intracranial and subarachnoid hemorrhage,  
10 the imaging studies for the safety parameter was not  
11 required by the protocol. 13 of 29 first reported  
12 first occurrences of confusion are considered to be  
13 procedure-related. Assessments demonstrating that  
14 confusion was not due to intracranial hemorrhage was  
15 not provided. And cognitive evaluations were not  
16 conducted.

17 And then looking at explanted and replaced  
18 devices, the complications -- they do have a nice  
19 table summarizing that, however, complications don't  
20 include all the clinical consequences and  
21 interventions do not include pharmacological or other  
22 clinical interventions. For example, one of the

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1 patients developed a scalp wound, required  
2 hospitalization for antibiotic therapy, but the  
3 interventions indicate only device explanation.

4 The primary effectiveness measure, if  
5 we're looking at effectiveness results -- switch gears  
6 here. The primary effectiveness measure assessed Meds  
7 OFF status only, but the device we just ask you to  
8 consider that since it will be adjunctively with  
9 medications to take that into consideration in your  
10 deliberations.

11 Benefit from stimulation beyond benefit of  
12 the microlesioning procedure with Meds cannot be  
13 determined because it did not assess the patient when  
14 the Meds were on.

15 The errors in the European Case Report  
16 Forms for the 2nd randomized assessment creates some  
17 problem with how to interpret those scores.  
18 Assessment, they assessed the effectiveness of the  
19 permanent impacts at the 3-months only, as far as  
20 primary measure was concerned and again it does not  
21 address how clinical outcome varies over time when the  
22 electrical stimulation and whether electrical

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1 stimulation effects diminish or not over time.

2 Looking at the open label scores and  
3 results, the sponsor evaluated within visit comparison  
4 of Stim OFF to Stim ON. Comparisons were not focused  
5 on baseline, comparison to baseline. The within-visit  
6 comparisons do not accurately describe the extent of  
7 the clinical change from true baseline measures.

8 The Meds ON/Stim OFF motor scores were  
9 often worse than pre-implant Meds ON scores, but the  
10 medications were reduced so at least for the STN  
11 patients which may account for the worsening of those  
12 scores after implant.

13 For the bilateral STN patients, the UPDRS  
14 Motor Exam improvement from pre-implant to the best  
15 follow-up score after implantation demonstrated a  
16 little less than 25 percent improvement and I think  
17 the best score was at 6 months. But they were close,  
18 but at all time points similar.

19 Medications. Medications were reduced in  
20 most STN patients. Reasons for the reductions were  
21 not provided. The Meds were to be held constant  
22 according to the protocol, but the Meds reduction in

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1 at least one case indicated failure instead of  
2 success, so I thought that this medication analysis  
3 might need to have some more description, for  
4 instance, in one case the patients' dyskinesias got a  
5 lot worse and they had to just cut the medicines back.  
6 The patient also experienced behavior disorder  
7 characterized by hallucinations and being aggressive  
8 and ultimately died due to end-stage Parkinson's  
9 disease.

10 I also ask you consider focusing on Stim  
11 OFF to Stim ON within visit assessments. Again, if we  
12 look at the walk time from one of the objectives  
13 assessments that were conducted, you can see that at  
14 pre-implant the average was -- the mean value was 11.4  
15 and at one month it was increased to 15.3 so it got  
16 slower which is the worsening effect, whereas if you  
17 look at just the Stim OFF Stim ON, there is a small  
18 difference of 0.1 and although it's deemed to be  
19 statistically significant, I ask you to consider the  
20 clinical meaning of that difference and whether it  
21 might be more appropriate to look at comparison to the  
22 baseline.

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1 I have a number of graphs I won't dwell  
2 on. We will have -- this is the bilateral STN group.  
3 On the left we had Meds ON. On the right we have Meds  
4 OFF. And I just basically am putting these up to  
5 again give a little more visual comparison to  
6 baseline, the pre-implant values and also to give you  
7 a better concept of for instance with Meds ON on the  
8 left hand side, their starting values on the UPDRS  
9 Motor Exam which goes from 0 to 108 score, possible  
10 108 maximum score which is worse, they start down  
11 lower in the range. So to consider clinically what  
12 does that mean for both of those.

13 The next one is doing the same thing, but  
14 it's for the Bilateral GP patients. Again, just  
15 wanted you to take care, notice the pre-implant versus  
16 post-implant scores as well as the Stim OFF to Stim ON  
17 comparison and again with the medications on the  
18 scores are lower than they are in the medication OFF  
19 state.

20 The company is making claims that include  
21 reduction in tremor, rigidity, bradykinesia, postural  
22 instability, so again, just very quickly tremor scores

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1 you can see on the left side, left graph the ON  
2 medication state, the average was 1 point something at  
3 baseline on medications and actually the scores got  
4 worse without the stimulation after surgery. That may  
5 be accounted for by the fact that medications were  
6 reduced, but then if you're just considering Stim OFF  
7 to Stim ON values without comparing to baseline, you  
8 may get a different picture than if you're  
9 additionally doing a baseline comparison.

10 This is again tremor, it's the GP  
11 patients. You can see with Meds ON there's not much  
12 difference and there again, they're starting off very  
13 low on the scale for tremor.

14 Next. Rigidity. This is the bilateral  
15 STN group. The left hand side is on medications. The  
16 right hand side is off medications.

17 I think we can go on to the next one.  
18 Bradykinesia, we have Meds ON on the left hand side  
19 and this is the bilateral STN group. And on the right  
20 side is the Meds OFF.

21 Next. This is the bilateral GP group.  
22 The left hand side is on medications. And the right

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1 hand side will be off medications.

2 This is just postural instability. On  
3 medications for the bilateral STN group and on  
4 medications on the left, off medications on the right.

5 This is the GP patients, bilateral GP. On  
6 medications on the left and off medications on the  
7 right.

8 In summary, I just ask you to note that as  
9 far as safety summary, in some areas it's difficult to  
10 understand, it's a little difficult to get a complete  
11 picture of what was experienced. There's a lot of  
12 information there, but some of it appears in some  
13 places and not in other places. So it's a little  
14 difficult to pull together.

15 No total PDRS score analysis was provided  
16 and there was some concern about whether that can be  
17 done because of the questions about the different  
18 sections of the IDE case report form being unclear as  
19 to the patient status, when they took, when they were  
20 assessing the different sections. Surgical treatment  
21 options, there were multiple <sup>\*\*</sup>confounding variables.  
22 Please take that into account. Testing with

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1 medications off was the focus of the application, but  
2 we ask you to consider how dose that relate to the  
3 clinical experience when it's used adjunctively with  
4 medications.

5 There were changes in medications during  
6 the study that make it a little more difficult to  
7 interpret the results. Masking, you already have  
8 discussed the issue with masking of patients which was  
9 not assessed to assure that blinding had occurred or  
10 masking had occurred and pulling of studies, the  
11 sponsor provided a number of statistical analyses that  
12 they claim shows poolability. We also ask you to  
13 consider whether these analyses are clinically  
14 meaningful as well. Thank you very much.

15 CHAIRPERSON CANADY: Good afternoon, Mr.  
16 Dawson.

17 MR. DAWSON: Good afternoon. I'm John  
18 Dawson. I'm the FDA reviewing statistician on this  
19 application. I appreciate the opportunity to speak to  
20 you this afternoon. I have to note a couple of  
21 caveats very quickly. First of all, I know that  
22 stimulator is spelled S-T-I-M-U-L-A-T-O-R. I think

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1 it's spelled correctly on the handbooks. Next point  
2 is that as Captain Schroeder pointed out, there was no  
3 IDE for the pivotal clinical trial that we're  
4 reviewing today, so consequently there was no  
5 statistical review of the protocol covering the issues  
6 such as sample size and methods of analysis, just to  
7 mention a couple of things that we would normally look  
8 at.

9 And finally, everything that I'm going to  
10 talk about in the next few minutes is based on summary  
11 results in the PMA, sample size, means, standard  
12 deviations, percents. Normally, we like to do some  
13 kind of a review of the raw data in machine readable  
14 form, at least sufficient to verify some of the  
15 principal endpoints, but we haven't done that in this  
16 case unfortunately.

17 I want to focus on sponsor's choice of the  
18 primary effectiveness endpoint. I promise I'm going  
19 to add something to this, but I do want to point out  
20 the precise statement of the primary effectiveness  
21 endpoint. It's the comparison of the motor  
22 examination score, TME, of the UPDRS with stimulation

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1 ON compared to stimulation OFF and a double blind  
2 randomized assessment at the 3-month follow-up.

3 I point out that it was only at the 3-  
4 month follow-up and also as of this morning, based on  
5 what Dr. Montgomery and Dr. Olanow said, I think that  
6 double blind is a misnomer. Based on their statements  
7 that when the stimulator is turned on the patient who  
8 has been off stimulator knows at least initially that  
9 it has gone on and also that if a patient is off the  
10 stimulator after a period of time they're going to  
11 know that it's off because the symptoms come back and  
12 in the randomized study it was a two hour period over  
13 which to notice these effects.

14 So basically I think from a statistical  
15 point of view you can consider this study to be  
16 basically part of the open label, so-called analysis.  
17 The only difference is that there was a two hour  
18 washout whereas at 30 minute there was one hour was  
19 used in the regular part of the open label follow-up.

20 Next slide, please. I want to point out  
21 a couple of critical levels for the TME. First of  
22 all, the inclusion criteria, the TME had to be at or

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1 above 30 in the OFF Med state, so above 30 is  
2 basically what we consider to be I guess to be sick,  
3 below 30 is somewhat better than that. And in this  
4 statistically clinically significant change from Stim  
5 OFF to Stim ON in the PMA was stated to be 25 percent.

6 If we can accept the proposition that  
7 there is a placebo effect, the question that I have  
8 and can't answer is how many of those 25 percentage  
9 points are placebo and how much beyond that is  
10 clinically meaningful change? That's unfortunately  
11 just unknown at least at this point.

12 Next slide, please. I have a simple table  
13 based on the PMA numbers. It covers 82 of the 96  
14 implanted patients. 82 is the number that were  
15 entered into the randomized trial at 3-months and the  
16 term randomized, I hope applies, although I have a  
17 question about that later.

18 And this assembles all of the numbers from  
19 the crossover design and reduces them down to the  
20 average TMA score in the Stim OFF state for those 82  
21 patients and you see that that's a 50.1. I would  
22 point out that the mean Stim OFF TME score,

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1 pre-implant was 54, so basically at this point at  
2 3-months when they're off stimulation for 2 hours or  
3 actually in excess of 2 hours in some cases in one  
4 half of the study, they're basically back up to the  
5 pre-study level.

6 The Stim ON number at 29.0 is a mean. A  
7 good thing about that is that it's not above the 30,  
8 so basically they're on the good side of the inclusion  
9 criteria. These patients have the 29. None of them  
10 would have been eligible for the study.

11 Now the key number that I want to point  
12 out here is the percent difference, the -42.1.  
13 Compare that to the 25. The 25 was the targets. 42  
14 is above the 25. Next to that number is the standard  
15 error, 3.2. And that's the calculation that I did to  
16 which I inserted a mild positive correlation between  
17 TME at Stim OFF and Stim ON which is not a  
18 conservative thing to do. It's somewhat on the  
19 liberal side. And so the confidence interval at 42.1  
20 from -35.6 up to 48.3 is not by any means too narrow.  
21 I think it's reasonable. \*\* And what I want to point  
22 out, the key thing on this slide from my point of view

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1 is that the confidence interval excludes 25 percent.

2 So if this difference here between the 50  
3 and the 29 is purely treatment effects of the Activa,  
4 then that's a strong showing of a treatment effect.  
5 That assumes that there's no placebo part that needs  
6 to be somehow factored out of that.

7 Next slide, please. This is basically the  
8 same analysis but it's done using only the original  
9 randomization assignments in a crossover design and  
10 this is pretty much the standard thing to do in light  
11 of the lack of statistical power for testing the  
12 carryover effect.

13 What you do is you throw out the whole  
14 second part of the study. You go back to just what  
15 people entered into first, whether they were first  
16 with Stim OFF or first with Stim ON and you look at  
17 those numbers and it gives you a reasonable look at  
18 the difference and you see that the 48 and the 31.8  
19 are pretty much like the overall numbers for the  
20 entire design. The confidence interval on the  
21 difference, 25.9, up to 42.7, still excludes 25. So  
22 this means that under a conservative use of the

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1 experimental data, it still supports a strong showing  
2 of a treatment effect, if in fact it is only a  
3 treatment effect.

4 The one thing I'm concerned about here is  
5 that in period one of that crossover design, 44  
6 patients were randomized to Stim OFF and 37 to Stim  
7 ON. And this is why I said that I would have to raise  
8 a question about the randomization. He would not  
9 expect that much of an imbalance. We cannot think  
10 about an explanation that would result in things being  
11 that lopsided. One possibility is somehow people were  
12 randomized first to one arm and then for one reason or  
13 another switched to the other. But unfortunately, we  
14 don't know.

15 Next slide, please. This is the open  
16 label data. You've seen that in a couple of forms  
17 already. What is added here is the difference, the  
18 percent difference over time and you want to compare  
19 that to the critical level of 25 on the vertical  
20 scale. You see that that percent difference is always  
21 above 25.0. I did the test, my follow-up period, and  
22 it always excludes 25 so that strong apparent showing

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1 of a treatment effect holds up in the open label data  
2 across the 12 months.

3 Next slide, please. This is the same  
4 graphic for the patients at medication ON in the OFF  
5 label. If I didn't say it I meant to, in the  
6 randomized study it was only with the medication OFF.  
7 In the regular follow-up Day 1 clinic visit, they went  
8 through OFF/ON on both medication and Stim and in this  
9 situation also I would call your attention to the  
10 percent difference and I did the significance test on  
11 all those means, ON and OFF. There is nothing that is  
12 based on the baseline measure. These are strictly  
13 contemporaneous ON, contemporaneous OFF. And again,  
14 the confidence interval always excludes the 25  
15 percent.

16 Next slide, please. Maybe I can move a  
17 little faster on this. This is the GP bilateral.  
18 This is again taking the randomized study, reducing it  
19 down to a number for Stim OFF and Stim ON. The means,  
20 the mean for Stim OFF is 46.7. The mean at pre-  
21 implant for these patients was 51. So again they're  
22 back up in the pre-implant neighborhood. For Stim ON,

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1 it's now borderline at the 30 critical point. The  
2 average difference or the difference in the averages,  
3 I should say, is -34 which is above 25, but when I do  
4 the significance test on that, it goes down to 23.3.  
5 It does not exclude 25. The showing is simply not as  
6 strong for GP as for STN.

7 Next slide, please. This we can go over  
8 very quickly. This again is just looking at the  
9 period 1 results. The confidence interval and the  
10 difference again fails to exclude the 25 percent, so  
11 again it's just not as strong as the STN numbers.

12 Next slide, please. This again looks at  
13 the open label results for the follow-up periods out  
14 to 12 months and the percent difference, as you can  
15 see, hovers around the 25 and I think, as I recall,  
16 the endpoints that is at one month and 12 months it's  
17 excluded 25 percent, but not in between.

18 Next slide, please. And again, this is  
19 with the medication ON . Once the medication is on,  
20 clearly there's simply not that much to be  
21 contributed, it seems by the stimulation, at least  
22 when they're used together, the results of this study.

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1 Next slide, please. Okay, now I want to  
2 just recapitulate what the claim is, claim number 1,  
3 the sponsor has five of them, numbered 1 through 5.  
4 Number 1 is that the stimulator suppresses PD motor  
5 symptoms. The data source is the in-clinic assessment  
6 of TME from the UPDRS.

7 Next slide, please. The key points  
8 sponsor makes in the PMA is that basically you get  
9 about a 48.3 percent reduction in TME score, going  
10 from Stim OFF to Stim ON and about -37.7 percent for  
11 the GP targets, reducing by about a half for the STN,  
12 by about a third for the GP.

13 Next slide, please. These are the issues  
14 that I want to call to your attention. Some of this  
15 has already been gone over. Can the patients tell  
16 when the stimulation is on? The answer apparently is  
17 yes, initially, they can tell when it's turned on.  
18 How much in light of the fact that there is an  
19 anticipation of therapeutic benefit, how much does it  
20 account for the change in TME? I don't know the  
21 answer to that.

22 The third point, warning in the informed

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1 consent. If there was some question about whether  
2 there was a placebo effect, I just wanted to point out  
3 that the patients were warned in the informed consent  
4 in a half a dozen or so unpleasant ways that they  
5 could tell when stimulation is ON. Literature and  
6 placebo effect, there is literature. It's not a new  
7 subject and surgical intervention for treatment of  
8 Parkinson's is difficult to avoid placebo effect.  
9 Final point under placebo, I just want to raise the  
10 question as to whether it would be possible to get  
11 follow up data beyond 12 months. I have seen other  
12 surgical intervention device type studies where you  
13 can really get a lot of reassurance that placebo isn't  
14 accounting for a great deal, if you can follow people  
15 beyond that 12 month time point. Since the study was  
16 -- the data base was closed quite some time ago, it  
17 might be possible to get further follow-up.

18 Intent to treat analysis. We don't have  
19 all the patients accounted for on the TME scores.  
20 There were 96 bilateral patients on the STN target.  
21 Eighty-six of those were<sup>\*\*</sup> tested out to 12 months.  
22 There are another 10 not accounted for. The sponsor

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1 indicated in a February amendment that there are 20  
2 drop outs all together in the study. I would like to  
3 know what the TME scores are for the patients that are  
4 not in that summary.

5 I've already raised the question about the  
6 imbalance in randomization. It is certainly a source  
7 of concern on my part.

8 Next slide, please. Coding rules are not  
9 explained in the PMA. However, the TME item  
10 nonresponse matters handled, the TME is 14 questions.  
11 Each question has an ordinal score, 0, 1 through 4.  
12 I meant to mention this earlier, but that 15 that I  
13 had on the first slide means that that's an average of  
14 50 points for those 14 points on the TME, part of the  
15 UPDRS.

16 I'm just certain that there must have been  
17 some that didn't get filled in and I don't know how  
18 that was handled. Other issues, under-powered  
19 subgroup analyses with a total of 159 cases enrolled.  
20 Sophisticated analysis of a multivariate nature are  
21 under-powered in the sense that if some kind of  
22 regression were enova, it's done and you don't get a

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1 significant effect, that's good from sponsor's point  
2 of view, but you don't know that it's just because you  
3 didn't have a lot of data. And if we had a chance to  
4 review the protocol, we would have told sponsor that.  
5 Sorry.

6 Next slide, please. Claims 2 and 3,  
7 reduction in dyskinesia time, increase in the ON time  
8 without dyskinesia. The data source is self-reporting  
9 conditions at half hour intervals in the 2-day diaries  
10 preceding follow-up clinic visit.

11 Next slide, please. Basically, Dr. Olanow  
12 gave you these numbers this morning. The improvement  
13 in the amount of time reported on those diaries for ON  
14 time with dyskinesia and ON time without dyskinesia,  
15 those are certainly favorable numbers.

16 Next slide, please. What I'm concerned  
17 about there again is the placebo effect and under  
18 intent to treat analysis, the PMA says that the only  
19 diaries used were those that were 90 percent complete  
20 and we only have 71 out of 96 STNs bilateral  
21 implantations with a 12-month<sup>\*\*</sup> diary. I would like to  
22 see what the results are, some kind of a proc. free or

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1 other accounting of what the scores are for those  
2 patients that don't get into that analysis.  
3 Obviously, what I'm wondering is those patients that  
4 don't get into that diary analysis that provides those  
5 favorable changes in the number of ON hours, are they  
6 simply worse is something I think you'd want to take  
7 into account, that if you have a certain anticipation  
8 of a benefit in terms of ON hours, you'd want to know  
9 what your chance is to be in that favorable category.

10 Next slide, please. Coding rules, again,  
11 the PMA doesn't explain how the diary item non-  
12 response was handled. It's an extensive diary with  
13 many questions. Again, it's just about a physical  
14 certainty that some of those were not filled in. We  
15 don't know what was done with those blanks. Other  
16 issues again, there was not an IDE for this clinical  
17 trial so if there had been we would have urged sponsor  
18 to work out a quantitative hypothesis for each of  
19 these claims. I think you can see -- I think it was  
20 beneficial in claim No. 1 to be able to look at that  
21 25 percent. We don't have anything like that for the  
22 diary results.

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1                   Extent of Stim use as covariate. One  
2 thing that was asked at follow-up was how much people  
3 used the stimulator. I think Dr. Olanow indicated  
4 this morning that practically everybody had it on all  
5 the time, so this may be a moot point.

6                   Next slide, please. Claim No. 4,  
7 improvement in functional ability based on in-clinic  
8 assessment of the activities of daily living, part of  
9 the UPDRS.

10                   Next slide, please. Sponsor's assertion  
11 there's a reduction in median OFF medication ADL score  
12 from the implant to 12 months, 47.6 percent for STN,  
13 34.7 percent improvement. Almost the same numbers as  
14 for the TME, just a coincidence, I guess. But anyway  
15 that's favorable.

16                   Next slide, please. So what are the  
17 concerns about that? I wonder about the relevancy of  
18 comparing ADL pre and post-implant with Stim ON and  
19 post-implant. I just don't know really what that  
20 means. I think there was an explanation this morning  
21 about that.

22                   There was a problem also on the

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1 pre-implant form that when the UPDRS, when you pick up  
2 the UPDRS and look at page one, it says evaluate and  
3 Meds OFF and then when you get to the ADL part it has  
4 a place to fill in both for Meds ON and Meds OFF and  
5 we're just guessing that maybe somebody in this study  
6 looked at it and thought well, it's all Meds OFF, so  
7 the comparison of Meds ON a baseline is a problem

8 Next slide, please. Finally, the  
9 reduction in patients' PD medication, the data source  
10 is form 3 in the follow-up package.

11 Next slide, please. And sponsor indicates  
12 that almost half of the patients reduced PD medication  
13 by 25 percent or more at one month and somewhat more  
14 than half had reduced by 25 percent or more at 12  
15 months.

16 Next slide, please. My question about  
17 that is whether reduction dose is always good. This  
18 is the kind of nettlesome question we would ask if we  
19 reviewed the protocol ahead of time. If, in fact,  
20 what the device does is reduce the dyskinesia which is  
21 a side effect of the medication, the patient would  
22 have the option of increasing the dose. Anyway, that

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1 puzzled me.

2 The 25 percent reduction on the previous  
3 slide looks like a very nice kind of target, but we  
4 only see that post hoc. So we don't know why 25  
5 percent would be a target there.

6 Next slide, please. Finally, I just want  
7 to wrap up, covering what I think are the main points.  
8 One, all of these variables that show change over  
9 time, even if it's just one time to the next in a  
10 given day are subject to placebo effect. We don't  
11 know how much that accounts for anything, but it's in  
12 there somewhere and to some extent. It would be nice  
13 to see performance data beyond 12 months. Might shed  
14 some light on the placebo. The STN in the TME  
15 analysis made the 25 percent target. The GP target  
16 did not. There are issues of item nonresponse on all  
17 aspects of the UPDRS instruments in the TME diary of  
18 ADL endpoints. We need to know of the patients that  
19 don't make it into the summaries.

20 Thank you.

21 CHAIRPERSON CANADY: Thank you very much.

22 At this point it's our custom to have reviews by our

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1 panelists who have been designated in advance. Any  
2 questions for the FDA personnel?

3 We'll go on to the portion of our  
4 panelists' reviews. I would ask at this point since  
5 there have been a number of presentations that  
6 insomuch as possible those points which have already  
7 been presented, you might just mention and move on  
8 rather than have the extensive discussion you may have  
9 prepared in advance on issues that we've previously  
10 discussed.

11 We're going to have three presentations  
12 done in a very efficient fashion by Dr. Zamorano, a  
13 neurosurgeon; Dr. Nuwer, a neurologist; and Dr.  
14 Piantadosi and I apologize in advance for the third  
15 time, our statistician. It would be a statistician  
16 that would have a name like that.

17 Dr. Zamorano.

18 DR. ZAMORANO: Should we do it here?

19 CHAIRPERSON CANADY: However you would  
20 prefer.

21 DR. ZAMORANO: \*\* I had a presentation with  
22 slides, but --

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1 CHAIRPERSON CANADY: However, if you want  
2 to go stand there that's fine. However you prefer.  
3 We'll still know you're one of ours.

4 DR. ZAMORANO: Originally, I was assigned  
5 to make a review of the problem of surgical treatment  
6 of movement disorders specifically in Parkinson's  
7 disease and this is a little bit what I have in the  
8 slides, but I think I will make it a little faster and  
9 focus to the discussion as many of these issues have  
10 already been covered in the prior presentations.

11 Next slide, please. Basically, to place  
12 it in the scope of what we are discussing at this  
13 moment, first of all, stereotactic surgery was used to  
14 treat tremor disorder already 30 years ago and as has  
15 been already mentioned with the use of L-dopa for  
16 Parkinson's disease these surgeries were rarely  
17 performed during the last two decades.

18 Next slide, please. Some of the  
19 limitations of the drug treatment and especially some  
20 new understanding of the pathophysiology of  
21 Parkinson's disease as well as technical advances in  
22 neuroimaging and electrophysiological recording.

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1 Surgery has again considered an alternative treatment.

2 Next slide, please. And it has been  
3 focused already that the four cardinal symptoms of  
4 Parkinson's disease of tremor, rigidity, kinesia,  
5 postural instability and the medical treatment with  
6 L-dopa, one of the main problems that we're focused  
7 with the periods of dyskinesia with these patients and  
8 involuntary movement.

9 There are other problems involving in  
10 Parkinson's disease with dementia, freezing and other  
11 problems that make this a very devastating disease.

12 The main topic and I think this is not in  
13 discussion any more and just to place in perspective,  
14 the surgical options on patients with Parkinson's  
15 disease is the use thalamotomy.

16 Next slide, please. And this gives an  
17 idea, this is like a diagram that gives you an idea of  
18 the different structures that we have been involved  
19 all during the presentations during the day, the  
20 thalamus, basically and we have this striatum here  
21 where we have GPI and influence the thalamus and we  
22 have STN that is influenced indirectly the GPI through

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1 this, the thalamus and there is another, you see all  
2 there is a direct cortex to the spinal cord and cortex  
3 to the exterior influence.

4 And all of these are inhibitory or  
5 exhibitory pathways. So it's a very complex  
6 physiopathology and basically act in different levels  
7 is where we try to achieve some effects in these  
8 patients.

9 So the first one is the thalamus with the  
10 VIM, with a specific nucleus and it's here where we  
11 start all the surgical procedures. Basically,  
12 performing destruction in an ablative procedure of  
13 this specific destruction.

14 Next, please. With the thalamotomy,  
15 specifically in the ventral nucleus of the thalamus.  
16 Next. One of the clear -- this is just an example to  
17 show how it looks, these ablative procedures.

18 Next. The end result of the thalamotomies  
19 is basically we have a relatively good improvement in  
20 tremor and there is some morbidity related, but it was  
21 acceptable and these became a procedure to consider.  
22 As you can see, some of the persistent morbidity that

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1 has been addressed today.

2 Next, please. But basically, there is a  
3 90 percent 95 percent response to this ablative  
4 procedure in the thalamus with thalamotomy.

5 Next. Let's see, we can skip that. Next,  
6 please. Okay, complication of thalamotomy and any  
7 other ablative procedure. We have the hemorrhage, the  
8 infection and other transient postoperative adverse  
9 effects. We have mentioned confusion is one of the  
10 most important and other major complications with  
11 hemorrhage you can have hemiparesis and dysphasia.

12 The next. The bottom line is thalamotomy  
13 is a good alternative treatment for tremor and with a  
14 relatively low incidence of complications and  
15 obviously when most of the patients have bilateral  
16 symptoms, it goes to the bilateral thalamotomy and  
17 here, over more than 25 percent of the patients  
18 experience different types of problems and this  
19 morbidity becomes somehow unacceptable and this is the  
20 reason that bilateral thalamotomy is apparently not  
21 performed at most of the centers.

22 Next. In order to avoid this problem, it

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1 becomes common sense to go to a different alternative  
2 approach, is to use the same target, but with a  
3 different approach to the stimulation and the deep  
4 brain stimulation with the thalamus in the VON nucleus  
5 is what is already approved, has FDA approval already.  
6 Basically, the pathology is similar.

7 Next. And we have a good alternative  
8 treatment for tremor. But as we mentioned at the  
9 beginning tremor is probably not the major problem of  
10 these patients and this is the topic of the review  
11 we're doing today. If there is a place for surgical  
12 treatment in any of the other symptoms of Parkinson's  
13 disease and that becomes a little bit more complicated  
14 to analyze.

15 The first thing that happens is that  
16 pallidotomy and this again, an ablative procedure, was  
17 considered in patients with Parkinson's disease in  
18 order to alleviate other symptoms than the tremor.

19 Next. And next. We'll go a little faster  
20 over these slides. But basically the lesion of the  
21 globus pallidus interna involves some of the parts I  
22 already showed you in the first slide.

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1                   Next, please. Laitinen, basically was the  
2                   one that re-explored in the modern era of this use of  
3                   posteroventral pallidotomy and it was reported with  
4                   the ablative procedure in the pallidum, patients will  
5                   have some improvement in tremor, not as high as with  
6                   thalamotomy, but an important improvement in maybe 50  
7                   percent. But at the same time there was an important  
8                   improvement maybe in bradykinesia, akinesia, in the  
9                   rigidity and probably the main indication and probably  
10                  the only significant conclusion so far with this  
11                  pallidotomy is that these patients improve the  
12                  dyskinesias secondary to the medical treatment. So  
13                  patients that have the dyskinesias, this undesired  
14                  effect of medication, these patients they do benefit  
15                  with a pallidotomy so they have less dyskinesias.  
16                  Dyskinesias can be very incapacitating and can be as  
17                  bad as the disease over the life of these patients.

18                         Next. So the pallidum becomes a very  
19                         important target not just to treat the tremor, but  
20                         basically, especially the patients with medically  
21                         intractable symptoms, specifically the undesired  
22                         effect of L-dopa. In most of these patients as was

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1 addressed today, they do respond to L-dopa, but they  
2 become averse to this medical treatment because of  
3 dyskinesias.

4 Next. So the pallidum -- we can go to the  
5 next, please. So the pallidum becomes very, it's a  
6 second target that becomes some choice for these  
7 patients and you can go over this slide. This is just  
8 to give some idea of the improvement that has been  
9 reported using this target.

10 I must mention that in the 1950s and 1960s  
11 there were some other centers in Europe where they did  
12 have experience with the target close to the  
13 subthalamus at the insert and could result in tremor,  
14 also some of the -- they did report that it was an  
15 improvement in the rigidity and maybe in the akinesia,  
16 but at that time the ablative lesioning of the insert  
17 was with a very high morbidity in terms of patients  
18 have confusion and other problems. That's the reason  
19 that procedure didn't take so much -- wasn't used so  
20 much as the thalamotomy.

21 Next, please. So in this case it becomes  
22 an issue, you know, the target of the pallidum as an

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1 alternative and also this thalamus and when we're  
2 talking obviously of the ablative procedure, then the  
3 stimulation becomes an important point. From the  
4 technical point of view, pallidotomy is a little bit  
5 more difficult target than the thalamus. The thalamus  
6 is relatively large and the pallidum is a small target  
7 were it to be done for the surgery to be effective.  
8 Second, there are two structures very close to this  
9 internal portion of the pallidum and one is the  
10 optical tract, the visual pathway and the internal  
11 capsula where it has relationship with movement of the  
12 contralateral side. So it becomes -- it's more  
13 difficult to perform a right pallidotomy. I think  
14 most of the surgeons will agree with that. It  
15 requires a little bit higher degree of expertise.

16 Next. But it may be there is some  
17 controversy and we can see in this analysis today  
18 there are different techniques to define the precise  
19 location, if you use more or less functional  
20 information in the procedures.

21 Next. The next<sup>\*\*</sup>, please. But the GPI can  
22 be performed somehow, can be performed pallidotomy

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1 even the ablative procedure with a relatively low risk  
2 with some morbidity in the patients main effect  
3 probably number one would be the degrees of  
4 dyskinesias secondary to L-dopa. They do have  
5 improvement of the tremor in maybe 50 percent of the  
6 case and over time they become probably maybe improve  
7 this percentage of response to the tremor and maybe  
8 some response to the bradykinesia and the akinesia of  
9 these patients and they may improve postural  
10 instability.

11 Next, please. The next. This tells you  
12 which of the patients are the best candidates for a  
13 pallidotomy would be a patient that has very few of  
14 the other symptoms and the main symptom is the  
15 dyskinesias, secondary to the L-dopa. So with the  
16 pallidum stimulation -- next -- one of the advantages  
17 of pallidum stimulation versus the ablative would be  
18 to have less complications because you would not have  
19 the effect in these structures, basically, the optical  
20 pathway and the internal capsula, so you will have  
21 less complications.

22 Next. But the rest of the procedure