

**From:** Thompson, Edward  
**Sent:** Wednesday, December 10, 2014 8:30 AM  
**To:** 'Steve McGregor (smcgregor@ebsi.com)'  
**Subject:** Information Request for BL 125426/0

**Contacts:** Steve McGregor

Dear Mr. McGregor:

We are reviewing your biologics license application (BLA) dated April 5, 2012 for Coagulation Factor IX (Recombinant). We determined that the following information is necessary to continue our review:

1. With regard to your response to Item #1 of the CR letter:
  - a. In your response to CR Item #1 you have used a value which you termed equivalence acceptance criteria (EAC). Please explain the rationale to determine the exact value and provide validation.
  - b. In your response to CR Item #1 you have provided selective raw data for some, but not all lots. Specifically, no raw data were provided for the lots that (b) (4). Please provide all of the data.
  - c. Please clarify whether (b) (4) was filled into DP because in your response to CR item #1 no DP lots are listed in conjunction with this DS lot.
  - d. In your response to CR item 1d you have provided bench scale results for rFIX lots tested with various (b) (4) lots. The number of bench scale lots varies among the various tested (b) (4) lots. In one case less than (b) (4) bench scale lots were tested ((b) (4)). Please provide data for (b) (4) bench scale lots tested using (b) (4) lot and commit to test (b) (4) bench lots for each newly introduced (b) (4) lot.
2. In your response to CR item #4 you have provided information regarding Chinese Hamster Ovary Host Cell Protein clearance. More information and clarifications are needed as follows:
  - a. The Agency is concerned about the consistency of the HCP clearance because earlier results showed better clearance than the results reported in the response to the CR letter ((b) (4)). Please provide HCP clearance results for all lots, from lot (b) (4) to the most currently manufactured (b) (4) lot.
  - b. Please clarify if you are using the same HCP assay in the spiked studies that you used in the testing of commercial lots.

- c. According to your report the (b) (4) may reach (b) (4). Please explain then why the use of (b) (4) in the spiking study is the worst-case condition if you aim to examine the (b) (4).
- d. You have used two different units in the description of HCP clearance: it is not clear how mg/mL converts to ng/mg.



12/26/14 JPC

The review of this submission is on-going and issues may be added, expanded upon, or modified as we continue to review this submission.

Please submit your response to this information request as an amendment to this file by December 21, 2014 referencing the date of this request. If you anticipate you will not be able to respond by this date, please contact the Agency immediately so a new response date can be identified.

If we determine that your response to this information request constitutes a major amendment, we will notify you in writing.

The action due date for this file is April 29, 2015.

Please send an acknowledgement message for receipt of this request.

If you have any questions, please contact me at (240) 402-8443.

Sincerely,

Edward Thompson  
Regulatory Project Manager  
FDA/CBER/OBRR/RPMS