RECORD OF TELEPHONE CONVERSATION

Submission Type: BLA Submission ID: 125549/0 Office: OVRR

Product:
Meningococcal Group B Vaccine

Applicant:
Wyeth Pharmaceuticals Inc.

Telecon Date/Time: 24-Jun-2014 05:37 PM Initiated by FDA? Yes

Telephone Number:

Communication Categorie(s):
1. Information Request

Author: MICHAEL SMITH

Telecon Summary:
Three IR's regarding -------(b)(4)------- test

FDA Participants: Mike Smith, Drusilla Burns, Ted Garnett, Ram Naik

Non-FDA Participants: Carmel Devlin

Trans-BLA Group: No

Related STNs: None

Related PMCs: None

Telecon Body:

See e-mail below:

From: Smith, Michael (CBER)
Sent: Tuesday, June 24, 2014 5:37 PM
To: Devlin, Carmel (Carmel.Devlin@pfizer.com)
Cc: Burns, Drusilla L.; Garnett, Theodore; Naik, Ramachandra
Subject: STN 125549.0: ------(b)(4)------- test IR

Carmel,

I attached three information requests (IR's) from the review team regarding the ----*(b)(4)*---------- test.

Regards,

Mike

- Please confirm receipt of this IR and provide us with an estimated target date for your response.

Mike Smith, Ph.D.
LCDR, U.S. Public Health Service
Regulatory Project Manager
U.S. Food and Drug Administration
Center for Biologics Evaluation and Research
Office of Vaccines Research and Review
Division of Vaccines and Related Products Applications

Phone: 301-796-1569
Fax: 301-595-1124
E-mail: michael.smith2@fda.hhs.gov

See contents of PDF below:

CENTER FOR BIOLOGICS EVALUATION AND RESEARCH
OFFICE OF VACCINES RESEARCH AND REVIEW
DIVISION OF VACCINES AND RELATED PRODUCT APPLICATIONS

Date: **June 24, 2014**

Pages: **3**

To:
Carmel Devlin
Senior Director, Worldwide Regulatory Strategy
Pfizer Inc.
Authorized Agent for: Wyeth Pharmaceuticals Inc.
401 N. Middletown Road
Pearl River, NY 10965
Telephone: (485) 602-5537 **Fax: (485) 602-4139**

From:
Division of Vaccines and Related Products Applications
Office of Vaccines Research and Review
Point of Contact: LCDR Mike Smith, Ph.D.
Regulatory Project Manager
10903 New Hampshire Ave., White Oak Bldg. 71
Silver Spring, MD 2993-0002
Telephone: (301) 796-2640 **Fax: (301) 595-1124**

STN#: **125549/0**

Product: **Meningococcal Group B Vaccine**

Subject: **CBER request for additional information regarding Pfizer's ----------*(b)(4)*---------- test.**

1. The following comments pertain to the document entitled "Summary Report for Validation of the Method for ----------(b)(4)---------- of MnB RLP2086

Drug Substance," which is located under section 3.2.S.4.3 Validation of Analytical Procedures – ----------(b)(4)----------.

a. In Sections 2.1 Repeatability and 2.2 Intermediate Precision, you report the assay variability in terms of the ----------(b)(4)----------. Please indicate at what dilutions the drug substance is expected to be tested during routine release.

b. In Section 2.5 Linearity, you report the linearity of the assay. Please indicate whether samples of drug substance were measured against the references to generate the data used to demonstrate linearity. Linearity should be demonstrated based on the ability of the assay to report linear results for samples when quantitated against the reference.

   To assess linearity, you report slope, intercept, and R^2 of the regression analysis of the observed vs expected ----------(b)(4)---------- without pre-specified acceptance criteria. Because of the variance structure exhibited by the data, please perform the linear regression analysis on the log transformed scale. The 95% CI of the slope and intercept should also be reported.

c. Please verify that the validated quantitative range of the ----------*(b)(4)*---------- assay encompasses the range needed in terms of the highest and lowest acceptable -----(b)(4)----, based on the product specifications and expected ----(b)(4)---- tested, that might be measured during routine testing. For example, if the drug substance is tested at an expected ----------(b)(4)----------could be as low as 75% of that ----------(b)(4)----------.

d. Please provide any data available that demonstrate that the assay, as currently run, is able to detect changes in the product quality of the drug substance.

2. The following comment pertains to the document entitled "Summary Report for Validation of the ------(b)(4)------ Method for MnB RLP2086 Drug Product," which is located under section 3.2.P.5.3 Validation of Analytical Procedures – ----------(b)(4)----------".

a. In Section 2.2, Intermediate Precision, you report the variability of the ----------(b)(4)----------. Please indicate why a variance component analysis was not used to determine the variability of the assay.

b. In Section 2.5 Linearity, you report the linearity of the assay. Please indicate whether samples of drug product were estimated against the references to generate the data used to demonstrate linearity. Linearity should be demonstrated based on the ability of the assay to report linear

results for samples when quantitated against the reference.
Linearity data displayed in Figures 1 and 2 (page 16) do not appear to match the data presented in Tables 9 and 10 (page 15). It is also not clear how the range of --------(b)(4)------- was determined. Please clarify. In addition, please perform the linear regression analysis on the log scale, as described in 1b.

c. Please verify that the validated quantitative range of the ----------*(b)(4)*------- assay encompasses the range needed in terms of the highest and lowest acceptable ------(b)(4)-----, based on the product specifications and expected -----(b)(4)----- tested, that might be measured during routine testing. For example, if the drug product is tested at an expected ----------(b)(4)----------, the measured -----(b)(4)----- could be as low as 75% of that concentration ---(b)(4)---.

d. Please provide any data available that demonstrate that the assay, as currently run, is able to detect changes in the product quality of the drug product.

e. The inter-assay precision was assessed at the ----------(b)(4)---------- facility and the intermediate precision (reproducibility) was assessed at ----------(b)(4)---------- facilities. Please indicate which of the facilities would be used for testing and release of the drug product lots.

3. The stability program for the monovalent reference materials used for drug substance and drug product testing is described in Section 3.2.S.5 of the BLA. No characterization of the material with regard to ----------(b)(4)---------- has been included. If the ----------(b)(4)---------- of the reference materials shifts over time, ----------(b)(4)---------- may be over or underestimated in the drug product or substance. Please describe how the performance of the reference materials in the ----------*(b)(4)*---------- test will be monitored and controlled.

In your reply to this information request, we recommend that you restate the item and follow it with your explanation or clarification. Use of this format helps organize the relevant information and provides a self-contained document that facilitates future reference. If you have any questions, please contact LCDR Mike Smith, Ph.D., at 301-796-2640.