

1 FOOD AND DRUG ADMINISTRATION

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5 ONCOLOGIC DRUGS ADVISORY COMMITTEE (ODAC) MEETING

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Thursday, July 17, 2025

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8:00 a.m. to 12:54 p.m.

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Meeting Roster**DESIGNATED FEDERAL OFFICER (Non-Voting)****LaToya Bonner, PharmD, MBA**

Division of Advisory Committee and

Consultant Management

Office of Executive Programs, CDER, FDA

ONCOLOGIC DRUGS ADVISORY COMMITTEE MEMBERS (Voting)**William J. Gradishar, MD***(via video conferencing platform)*

Betsy Bramsen Professor of Breast Oncology &

Professor of Medicine

Deputy Director, Clinical Network

Director, Maggie Daley Center for

Women's Cancer Care

Robert H. Lurie Comprehensive Cancer Center

Northwestern University

Feinberg School of Medicine

Chicago, Illinois

1 **Daniel Spratt, MD**

2 *(via video conferencing platform)*

3 Associate Chief Scientific Officer, University

4 Hospitals Cleveland Medical Center

5 Medical Director, Clinical Research Center

6 Vincent K Smith Chair of Radiation Oncology

7 UH Seidman Cancer Center

8 Chair, Department of Radiation Oncology

9 Professor, Departments of Radiation Oncology and

10 Urology

11 Case Western Reserve University

12 Cleveland, Ohio

13

14 **Neil Vasan, MD, PhD**

15 *(Acting Chairperson)*

16 Director, Breast Cancer Translational Research

17 Assistant Professor

18 Department of Medicine, NYU Grossman School of

19 Medicine

20 Perlmutter Cancer Center, NYU Langone Health

21 New York, New York

22

1 **ONCOLOGIC DRUGS ADVISORY COMMITTEE MEMBER**2 **(Non-Voting)**3 **Tara L. Frenkl, MD, MPH**4 *(Industry Representative)*

5 Senior Vice President, Head of Global Medical

6 Strategy and Evidence Generation

7 Bayer Pharmaceuticals

8 Whippany, New Jersey

9

10 **TEMPORARY MEMBERS (Voting)**11 **Paul Beringer, PharmD**

12 Professor of Clinical Pharmacy

13 USC Alfred E. Mann School of Pharmacy and

14 Pharmaceutical Sciences

15 University of Southern California

16 Los Angeles, California

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18

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20

21

22

1 **Mark R. Conaway, PhD**

2 Professor, Division of Translational Research and
3 Applied Statistics
4 Department of Public Health Sciences
5 The University of Virginia School of Medicine
6 Charlottesville, Virginia

7
8 **John DeFlice, MD**

9 (*Patient Representative*)
10 Gastroenterologist, Retired
11 Albuquerque, New Mexico

12
13 **Ravi A. Madan, MD**

14 Senior Clinician
15 Head, Prostate Cancer Clinical Research Section
16 Genitourinary Malignancies Branch
17 Center for Cancer Research
18 National Cancer Institute
19 National Institutes of Health (NIH)
20 Bethesda, Maryland

1 **Grzegorz (Greg) S. Nowakowski, MD, FASCO**

2 Professor of Medicine and Oncology

3 Enterprise Deputy Director for Clinical Research

4 Mayo Clinic Comprehensive Cancer Center

5 Chair, Lymphoid Malignancy Group

6 Vice-Chair, Division of Hematology

7 Mayo Clinic

8 Rochester, Minnesota

9

10 **FDA PARTICIPANTS (Non-Voting)**

11 **Richard Pazdur, MD**

12 Director

13 Oncology Center of Excellence (OCE), FDA

14 Director (Acting)

15 Office of Oncologic Diseases (OOD)

16 Office of New Drugs (OND), CDER, FDA

17

18 **Nicole Gormley, MD**

19 Director

20 Division of Hematologic Malignancies II (DHM II)

21 OOD, OND, CDER, FDA

22

1 **Nicholas Richardson, DO, MPH**

2 Deputy Director

3 DHM II, OOD, OND, CDER, FDA

4

5 **Bindu Kanapuru, MD**

6 Supervisory Associate Director for

7 Therapeutic Review

8 DHM II, OOD, OND, CDER, FDA

9

10 **Deepti Telaraja, MD**

11 Clinical Team Leader (Acting)

12 DHM II, OOD, OND, CDER, FDA

13

14 **Andrea Baines, MD, PhD**

15 Clinical Reviewer

16 DHM II, OOD, OND, CDER, FDA

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1 P R O C E E D I N G S

2 (8:00 a.m.)

3 **Call to Order**

4 **Introduction of Committee**

5 DR. VASAN: Good morning, and welcome. I
6 would like to first remind everyone to please mute
7 your line when you're not speaking. All members of
8 the public are reminded to silence their phones and
9 other devices, and to otherwise refrain from
10 disrupting the meeting. Loud talking or applause
11 may make it difficult for meeting participants and
12 observers to hear the proceedings.

13 My name is Dr. Neil Vasan, and I will be
14 chairing this meeting. I will now call the
15 July 15, 2025 Oncologic Drugs Advisory Committee
16 meeting to order. We'll start by going around the
17 table and introduce ourselves by stating our names
18 and affiliations. We'll start with the FDA to my
19 left and go around the table.

20 DR. PAZDUR: Richard Pazdur, Director,
21 Oncology Center of Excellence, FDA.

22 DR. GORMLEY: Nicole Gormley, Director of

1 the Division of Heme Malignancies II, FDA.

2 DR. RICHARDSON: Good morning. Nicholas
3 Richardson, Deputy Director, Division of
4 Hematologic Malignancies II, FDA.

5 DR. KANAPURU: Good morning. Bindu
6 Kanapuru, Associate Director, Division of Heme
7 Malignancies II, FDA.

8 DR. TELARAJA: Good morning. Deepti
9 Telaraja, Acting Clinical Team Lead, Division of
10 Hematologic Malignancies II at the FDA.

11 DR. BAINES: Good morning. Andrea Baines,
12 Clinical Reviewer, Division of Hematologic
13 Malignancies II, FDA.

14 DR. SPRATT: Dan Spratt, Chair of Radiation
15 Oncology at UH Seidman Cancer Center at Case
16 Western Reserve University, and stuck because of a
17 canceled flight.

18 DR. MADAN: Good morning. Ravi Madan,
19 medical oncology, National Cancer Institute.

20 CDR BONNER: Good morning. LaToya Bonner,
21 DFO, CDER.

22 DR. VASAN: Neil Vasan. I'm a breast

1 oncologist at NYU Langone.

2 DR. NOWAKOWSKI: Greg Nowakowski. I'm a
3 hematologist at Mayo Clinic Rochester, where I also
4 serve as Deputy Director of the Cancer Center for
5 Clinical Research.

6 DR. DeFLICE: I'm John DeFlice. I'm a
7 patient representative, and I'd like to review why
8 I am a patient representative from myeloma. I'm a
9 15-year survival of multiple myeloma. I'm involved
10 with two support groups sponsored by the
11 International Myeloma Foundation, one I've been
12 involved with for 13 years. And we meet by Zoom
13 and primarily for people in New Mexico, which is a
14 rural state, although we have many members that
15 join us from other states, including Canada.

16 I'm also involved with a Spanish support
17 group, Las Voces de Mieloma, which meets monthly
18 and is primarily for Spanish-speaking patients with
19 myeloma. We have patients from South America, all
20 the way from Argentina to Dominican Republic, and
21 sometimes Europe. I'm also a volunteer with the
22 LLS and the First Connection Program so that

1 Spanish-speaking patients are referred, and we
2 support them through hope and understanding of
3 their therapies.

4 My first seminar was one month after my
5 diagnosis, which was 15 years ago. I've attended
6 the American Society of Hematology for a number of
7 years, and as a gastroenterologist, I feel like
8 I've done a fellowship in oncology.

9 DR. BINGER: Paul Beringer, School of
10 Pharmacy, University of Southern California.

11 DR. CONAWAY: Mark Conaway, biostatistics,
12 University of Virginia.

13 CDR BONNER: Dr. Gradishar, you're next.
14 Can you please unmute your mic and cut on your
15 webcam, and introduce yourself to the group?

16 (No response.)

17 CDR BONNER: Dr. Frenkl, you can go ahead
18 and introduce yourself.

19 DR. FRENKL: Tara Frenkl. I am the
20 non-voting pharmaceutical industry rep. I work for
21 Bayer Pharmaceuticals as the head of Global Medical
22 and Evidence.

1 DR. VASAN: We'll come back to
2 Dr. Gradishar.

3 For topics such as those being discussed at
4 this meeting, there are often a variety of
5 opinions, some of which are quite strongly held.
6 Our goal is that this meeting will be a fair and
7 open forum for discussion of these issues, and that
8 individuals can express their views without
9 interruption. Thus, as a gentle reminder,
10 individuals will be allowed to speak into the
11 record only if recognized by the chairperson. We
12 look forward to a productive meeting.

1 reminded to please refrain from discussing the
2 meeting topic during the break. Thank you.

3 CDR Bonner will read the Conflict of
4 Interest Statement for the meeting.

5 **Conflict of Interest Statement**

6 CDR BONNER: Thank you.

7 The Food and Drug Administration is
8 convening today's meeting of the Oncologic Drugs
9 Advisory Committee under the Federal Advisory
10 Committee Act, FACA, of 1972. At today's meeting,
11 the committee will discuss BLA 761440, belantamab
12 mafodotin, submitted by GlaxoSmithKline, LLC, for
13 the treatment of adults with multiple myeloma in
14 combination with bortezomib and dexamethasone in
15 patients who have received at least one prior line
16 of therapy; and in combination with pomalidomide
17 and dexamethasone in patients who have received at
18 least one prior line of therapy, including
19 lenalidomide.

20 With the exception of the industry
21 representative, the members of the committee are
22 either special or regular government employees and

1 are subject to federal conflict of interest laws
2 and regulations. Accordingly, FDA has reviewed the
3 financial interests of the committee members for
4 compliance with federal ethics and conflict of
5 interest laws. We have screened the members for
6 potential financial conflicts of interest related
7 to today's meeting agenda, both their own interests
8 and those that are imputed to them, including those
9 of their spouses, minor children, and employers.

10 Based on the agenda for today's meeting and
11 all financial interests reported by the committee
12 members, no conflict of interest waivers under
13 18 U.S.C. 208 have been issued in connection with
14 this meeting.

15 Dr. Tara Frenkl of Bayer Pharmaceuticals is
16 participating in this meeting as a non-voting
17 industry representative acting on behalf of
18 regulated industry. Consistent with Commissioner
19 Makary's April 17, 2025 statement, FDA is only
20 including industry representatives in advisory
21 committee meetings where required by statute. FDA
22 is required to include an industry representative

1 in today's meeting under 21 U.S.C. 355(n)(3)(c).

2 Industry representatives are not appointed
3 as special government employees nor are they
4 regular government employees. Industry
5 representatives serve as non-voting members of the
6 committee. Non-voting industry representatives
7 represent all regulated industry and not any
8 particular association, company, product, or
9 ingredient, and bring general industry perspective
10 to the committee.

11 Under FDA regulations, although a non-voting
12 member serves in a representative capacity, the
13 non-voting member shall exercise restraint in
14 performing such functions and may not engage in
15 unseemly advocacy or attempt to exert undue
16 influence over the other members of the committee.

17 We would like to remind all members of the
18 committee that if the discussions involve any other
19 products or firms not already on the agenda for
20 which you have a personal or imputed financial
21 interest, you must recuse yourself from that
22 discussion, and your recusal will be noted for the

1 record.

2 FDA asks that all other participants,
3 including the industry representative and open
4 public hearing speakers, advise the committee of
5 any financial relationships that they have with any
6 affected firms, its products, and if known, its
7 direct competitors. We would like to remind the
8 members that if the discussions involve any
9 products or firm not already on the agenda for
10 which an FDA participant has a personal or imputed
11 financial interest, the participant needs to inform
12 the DFO and exclude themselves from the discussion,
13 and their exclusion will be noted for the record.

14 Thank you.

15 I will go back to Dr. Gradishar to see if
16 he's available, if he can introduce himself.
17 Please unmute your mic and cut on your webcam.

18 DR. GRADISHAR: Good morning. Bill
19 Gradishar, Northwestern University, Medical
20 Oncology.

21 CDR BONNER: Thank you, sir.

22 Now, I will turn the meeting back over to

1 our chair. Thank you.

2 DR. VASAN: We will now proceed with FDA
3 introductory remarks from Dr. Deepti Telaraja.

4 **FDA Introductory Remarks - Deepti Telaraja**

5 DR. TELARAJA: Good morning. I'm Deepti
6 Telaraja, a hematologist/oncologist in the Division
7 of Hematologic Malignancies II at the FDA. I will
8 provide the FDA's introductory remarks for
9 belantamab mafodotin and the key issues for the
10 ODAC today. I'll first provide some background
11 about the drug's history; the proposed indications;
12 a description of the DREAMM-7 and DREAMM-8 trials;
13 and the current treatment landscape for patients
14 with relapsed or refractory multiple myeloma. I'll
15 then provide an overview of the key issues.

16 Today's ODAC will focus on the key safety
17 finding with belantamab mafodotin, which is ocular
18 toxicity, as well as the uncertainty regarding the
19 appropriateness of the dosages that were evaluated
20 in DREAMM-7 and DREAMM-8. And finally, I'll
21 conclude with some dose optimization and
22 benefit-risk considerations.

1 Belantamab mafodotin is a BCMA-directed
2 antibody drug conjugate. It was previously granted
3 accelerated approval based on a single-arm trial in
4 August of 2020 as monotherapy for the treatment of
5 patients with relapsed or refractory multiple
6 myeloma after four or more therapies, including a
7 proteasome inhibitor, an immunomodulatory agent,
8 and an anti-CD38 monoclonal antibody.

9 A postmarketing requirement was issued to
10 conduct a randomized trial to confirm clinical
11 benefit. Due to a failed confirmatory trial,
12 belantamab mafodotin was voluntarily withdrawn from
13 the U.S. market in February of 2023. Currently, it
14 is not marketed for any indications in the U.S.

15 While it was ultimately approved, due to
16 significant concerns with ocular toxicity and
17 dosing as monotherapy at the dose of 2.5 milligrams
18 per kilogram every 3 weeks, an ODAC was held to
19 discuss the impact of ocular toxicity on
20 benefit-risk. The ODAC advised that for the
21 proposed population, which again was a late-line
22 population of patients who had received four or

1 more prior therapies, the benefit-risk was
2 favorable. Due to the concerns with ocular
3 toxicity and dose, it was approved along with a
4 comprehensive risk evaluation and mitigation
5 strategy, or REMS, and a postmarketing requirement
6 was issued to evaluate alternative dosing regimens
7 and lower doses.

8 The current application is based on two
9 randomized phase 3 trials, DREAMM-7 and DREAMM-8.
10 DREAMM-7 evaluated belantamab mafodotin in
11 combination with bortezomib and dexamethasone, or
12 BVd, in patients who had received at least one
13 prior line of therapy. The proposed dosage of
14 belantamab mafodotin is 2.5 milligrams per kilogram
15 every 3 weeks, which is the same dosage that was
16 previously approved as monotherapy.

17 DREAMM-8 evaluated belantamab mafodotin in
18 combination with pomalidomide and dexamethasone, or
19 BPd, in patients who had received at least one
20 prior line, including lenalidomide. In DREAMM-8,
21 the starting dose of belantamab mafodotin is the
22 same at 2.5 milligrams per kilogram, but it steps

1 down to 1.9 milligrams per kilogram from Cycle 2,
2 and the dosing interval is 4 weeks. In both
3 regimens, belantamab mafodotin is administered
4 until progressive disease or unacceptable toxicity.

5 Schemas for the DREAMM-7 and DREAMM-8 trials
6 are shown on this slide. DREAMM-7 randomized
7 patients between BVd versus daratumumab in
8 combination with bortezomib and dexamethasone, or
9 DVd. DREAMM-8 randomized patients between BPd
10 versus pomalidomide, bortezomib, and dexamethasone
11 or PVd. In each trial, the primary endpoint was
12 progression-free survival, or PFS, and key
13 secondary endpoints were overall survival, or OS,
14 duration of response, and minimal residual disease
15 negativity.

16 The key results of PFS and OS from each
17 trial are shown on this slide. Both trials met
18 their primary PFS endpoint. In DREAMM-7, OS met
19 statistical significance, while in DREAMM-8, OS did
20 not reach statistical significance. DREAMM-8 is
21 not adequately powered for OS and may not
22 demonstrate statistical significance.

1 Before moving on to a discussion of the
2 issues, I'd like to provide some context about the
3 treatment paradigm for current patients with
4 multiple myeloma.

5 In the U.S., based on recent approvals of
6 quadruplets in the newly diagnosed setting, most
7 patients will receive a 4-drug regimen containing
8 an anti-CD38 monoclonal antibody, a proteasome
9 inhibitor, an immunomodulatory agent, and
10 dexamethasone upfront such as Dara-VRD or Isa-VRD.
11 Patients who are transplant eligible go on to
12 receive autologous stem cell transplant and
13 maintenance therapy. For relapsed or refractory
14 disease, patients may receive a subsequent 3- or
15 4-drug regimen with novel combination partners, CAR
16 T-cell therapy, or bispecific antibodies.

17 In the current treatment landscape, there
18 are concerns regarding the applicability of the
19 DREAMM-7 and DREAMM-8 comparator arms, and
20 therefore, the studies' results to current U.S.
21 patients with relapsed or refractory multiple
22 myeloma. I'll cover these considerations in more

1 detail on the next slide.

2 In both trials, there was very limited U.S.
3 enrollment, less than 5 percent in each trial. The
4 DREAMM-7 comparator arm of DVd would not typically
5 be used in the second line or later setting, as
6 each of the components of this regimen would have
7 already been received, as I noted previously. And
8 while the DREAMM-8 comparator, PVd, does include
9 pomalidomide, which is typically not given in the
10 upfront setting, PVd is not an approved regimen in
11 the U.S. and has limited usage.

12 These factors directly impact the relevance
13 of the trials' results to current U.S. patients,
14 and these considerations are important in the
15 benefit-risk assessment of belantamab mafodotin.
16 As mentioned, the key issues include the high rates
17 of ocular toxicity and uncertainty regarding the
18 appropriateness of the proposed dosages.

19 I'd like to first provide some context
20 regarding the ocular toxicity seen with belantamab
21 mafodotin. The toxicity is caused by damage to the
22 corneal epithelium, manifesting as corneal changes

1 and visual acuity changes. Corneal defects range
2 in severity from mild superficial changes to severe
3 epithelial defects and ulceration, and severe
4 corneal defects may be vision threatening. Visual
5 acuity changes are measured by testing of each eye
6 on an eye chart, and are based on best corrected
7 visual acuity. Best corrected visual acuity is the
8 best possible visual acuity achieved with the use
9 of corrective lenses such as glasses or contacts.

10 The applicant developed the Keratopathy and
11 Visual Acuity scale, or KVA scale, with input from
12 the FDA to grade this unique toxicity. Dose
13 modifications were also guided by this scale, with
14 modifications recommended for grade 2 and higher
15 events in both trials.

16 The figure on this slide shows simulations
17 of 20/50, 20/100, and 20/200 vision relative to
18 normalized 20/20 vision. In people with best
19 corrected visual acuity of 20/20, a change to 20/50
20 or worse would generally be considered clinically
21 significant.

22 For additional context to these changes, in

1 most states, a minimum visual acuity of 20/40,
2 which would be in between the 20/20 and 20/50
3 figures, is needed in at least one eye for an
4 unrestricted driver's license. Driving
5 restrictions are often placed for visual acuity of
6 20/70, which is in between the 20/50 and 20/100
7 figures, and at 20/200 vision, an individual would
8 be considered legally blind.

9 This table provides a summary of KVA events
10 by grade for each trial. In both trials, almost
11 all patients experienced a KVA event, with over
12 three-quarters experiencing a grade 3 or 4 event.
13 There were higher rates of grade 4 events in
14 DREAMM-7 as compared to DREAMM-8.

15 A substantial percentage of patients on both
16 trials had visual acuity changes, with over
17 60 percent experiencing changes to 20/50 or worse.
18 Over a quarter of patients had worsening to 20/100
19 or worse. As previously mentioned, this is beyond
20 a threshold at which driving restrictions should be
21 placed, and over 10 percent had worsening to 20/200
22 or worse, correlating with legal blindness.

1 There were high rates of recurrent events
2 with a median of three per patient, and while many
3 KVA events were reversible, it's unclear whether
4 recurrent corneal epithelial damage impacts
5 recovery. FDA's analysis focused on the last KVA
6 event and showed that over 70 percent of patients
7 had ongoing events at the data cutoff, including a
8 substantial percentage who had ongoing events
9 following treatment discontinuation.

10 Now I'll provide a brief overview of the
11 dosage selection for belantamab mafodotin in the
12 proposed combinations. In each dose-finding trial,
13 while a range of dose levels over a range of dosing
14 intervals were evaluated, there were limited
15 numbers of patients enrolled at each dose level;
16 and in general, there was a trend towards better
17 tolerability with lower doses and longer dosing
18 intervals. Despite this trend, the applicant
19 selected dosages that were the same as or similar
20 to the dosage that was previously approved as
21 monotherapy and had known safety and tolerability
22 concerns.

1 While these dosages were selected for the
2 trials being discussed today, the ongoing and
3 future development of belantamab mafodotin is based
4 on lower dosages with notably longer dosing
5 intervals.

6 The ongoing DREAMM-10 study of belantamab
7 mafodotin, in combination with lenalidomide and
8 dexamethasone versus daratumumab, lenalidomide, and
9 dexamethasone in the newly diagnosed transplant
10 ineligible setting, is using a dose of 1.9
11 milligrams per kilogram at 8-week intervals for 24
12 weeks followed by 12-week intervals. And as you'll
13 hear in the FDA main presentation, available data
14 from the dosing PMR study, DREAMM-14, which was
15 issued at the time of initial approval, also
16 suggest that there may be improved tolerability
17 with lower doses and longer dosing intervals.

18 The lack of adequate dose optimization is
19 also evident by the high rates of dose
20 interruptions, reductions, and discontinuations on
21 the belantamab mafodotin-containing arms of both
22 trials. There were high rates of dose

1 modifications due to KVA events, particularly dose
2 interruptions, which impacted approximately
3 three-quarters of patients.

4 I'd now like to briefly review the FDA's
5 evidentiary criteria for approval. Under the
6 Federal Food, Drug, and Cosmetic Act, for a new
7 approval in the United States, the FDA must
8 determine that the drug is safe and effective for
9 use under the conditions prescribed, recommended,
10 or suggested in the product labeling. The
11 demonstration of effectiveness requires substantial
12 evidence that the drug will have the effect it's
13 represented to have, and the demonstration of
14 safety requires showing that the benefits of the
15 drug outweigh its risks.

16 I'd next like to highlight some key
17 considerations about REMS as it relates to
18 benefit-risk. A REMS is a comprehensive drug
19 safety program that the FDA can require for certain
20 medications with serious but manageable safety
21 concerns. Importantly, it is a post-approval tool
22 that is used specifically when a drug demonstrates

1 a favorable benefit-risk profile but requires
2 enhanced risk management strategies. Each REMS is
3 strategically designed with targeted goals to
4 mitigate this identified risk. It is important to
5 understand what a REMS is not. It is not intended
6 as a remedy for drugs with unfavorable benefit-risk
7 profiles, as it cannot be used to compensate for a
8 safety concern that is deemed unacceptable.

9 I'll now turn to some general dose
10 optimization principles. It's important to note
11 that an unnecessarily high or poorly tolerated dose
12 may have several unwanted effects such as impacts
13 on patient functioning, quality of life, and even
14 their ability to remain on the intended dose and
15 derive maximal clinical benefit.

16 The determination of a safe and effective
17 dose is fundamental to the evidentiary criteria
18 that I just reviewed. It's critically important
19 that the dose is established prior to approval
20 because of significant challenges with
21 post-approval optimization. While sponsors may
22 propose to conduct these studies as postmarketing

1 requirements, at the FDA, we have seen several
2 challenges with this approach.

3 Marketing of a drug with an inadequately
4 optimized dose may expose large numbers of patients
5 to poorly tolerated dosages. While clinical trials
6 generally involve stringent monitoring and
7 mitigation strategies, these may be more
8 challenging to implement in the postmarket setting.
9 Patients, therefore, may be exposed to higher
10 levels of risk.

11 There are also feasibility challenges, as
12 there may be a lack of interest from patients and
13 clinical trial sites, and dose optimization after a
14 randomized trial is completed may not inform
15 benefit-risk. Even if a lower dose is found to
16 have a favorable safety, tolerability, and efficacy
17 profile in a dose optimization study, it will still
18 be unclear whether the efficacy seen in a
19 randomized trial at the higher dose would be
20 preserved with the lower dose. Ultimately, there
21 is the risk that a post-approval dose optimization
22 trial may not be complete or may not adequately

1 inform the benefit-risk and, therefore, may not
2 actually provide the necessary information to
3 establish a safe and effective dose.

4 I'll now turn to some key benefit-risk
5 considerations of belantamab mafodotin for the
6 proposed indications.

7 As previously described, both trials met
8 their primary PFS endpoint, and DREAMM-7 showed a
9 statistically significant improvement in OS. In
10 terms of risk, there were high rates of ocular
11 toxicity, including high rates of grade 3 or
12 greater events, which correspond to clinically
13 significant visual changes and/or severe corneal
14 defects. Patients had frequent recurrences
15 throughout treatment, and there were unresolved
16 events at the data cutoff, including in those who
17 had already discontinued study treatment.

18 There are also concerns regarding safety and
19 tolerability at the proposed dosages. In the
20 context of available data suggesting that lower
21 doses at longer dosing intervals may improve
22 tolerability and maintain efficacy, questions

1 remain regarding the appropriateness of the
2 selected dosages.

3 As previously noted, there are concerns with
4 the relevance of the studies' results to current
5 U.S. patients with relapsed or refractory multiple
6 myeloma. As patients are receiving anti-CD38,
7 antibody-based three or four drug regimens upfront,
8 the relevance of the control arms and the relevance
9 of the treatment effect seen with belantamab
10 mafodotin for current patients with relapsed or
11 refractory multiple myeloma is questionable. There
12 are also multiple available therapies for patients
13 with relapsed or refractory multiple myeloma who
14 have received one or more prior lines of therapy,
15 many of which have more established safety profiles
16 and demonstrated OS benefits.

17 It's important to consider whether the risks
18 of this unique ocular toxicity seen with belantamab
19 mafodotin are acceptable for this relatively
20 early-line patient population. For the proposed
21 population and indications, given these key
22 considerations and the current treatment paradigm,

1 the benefit-risk of belantamab mafodotin remains
2 uncertain.

3 We would like the committee to discuss
4 whether appropriate dosages of belantamab mafodotin
5 have been identified in the context of the observed
6 ocular toxicity, tolerability of the regimens, and
7 efficacy results from DREAMM-7 and DREAMM-8 in the
8 proposed relapsed or refractory multiple myeloma
9 population.

10 After the discussion, we will ask the
11 committee to vote on the following questions
12 separately for each indication.

13 Is the overall benefit-risk of belantamab
14 mafodotin in combination with bortezomib and
15 dexamethasone favorable at the proposed dosage in
16 the proposed patient population? And is the
17 overall benefit-risk of belantamab mafodotin in
18 combination with pomalidomide and dexamethasone
19 favorable at the proposed dosage in the proposed
20 patient population?

21 Thank you for your attention. This
22 concludes my presentation.

1 DR. VASAN: Thank you, Dr. Telaraja.

2 Both the Food and Drug Administration and
3 the public believe in a transparent process for
4 information gathering and decision making. To
5 ensure such transparency at the advisory committee
6 meeting, FDA believes that it is important to
7 understand the context of an individual's
8 presentation.

9 For this reason, FDA encourages all
10 participants, including the applicant's
11 non-employee presenters, to advise the committee of
12 any financial relationships that they may have with
13 the applicant, such as consulting fees, travel
14 expenses, honoraria, and interest in the applicant,
15 including equity interests and those based upon the
16 outcome of the meeting.

17 Likewise, FDA encourages you at the
18 beginning of your presentation to advise the
19 committee if you do not have any such financial
20 relationships. If you choose not to address the
21 issue of financial relationships at the beginning
22 of your presentation, it will not preclude you from

1 speaking.

2 We will now proceed with the presentations
3 from GlaxoSmithKline.

4 **Applicant Presentation - Hesham Abdullah**

5 DR. ABDULLAH: Good morning. My name is
6 Hesham Abdullah, Senior Vice President and Global
7 Head of Oncology R&D at GSK. Thank you for the
8 opportunity to present the data supporting the
9 benefit-risk of Blenrep in patients with
10 relapsed/refractory multiple myeloma. Blenrep
11 offers a novel mechanism of action that targets
12 B-cell maturation antigen or BCMA. BCMA is a cell
13 surface receptor highly expressed on malignant
14 plasma cells and is required for their survival.

15 Blenrep is an antibody drug conjugate
16 comprised of an afucosylated humanized IgG1
17 BCMA-targeting antibody linked to the microtubule
18 disrupting agent MMAF. Blenrep has a multimodal
19 mechanism of action, including direct cytotoxic
20 activity through the MMAF payload released into the
21 tumor cell, as shown by the red dots;
22 antibody-dependent cellular cytotoxicity by

1 NK cells; and macrophage-mediated,
2 antibody-dependent cellular phagocytosis, as well
3 as induction of markers consistent with immunogenic
4 cell death, which elicit an adaptive immune
5 response. It's this unique mechanism of action
6 that leads to the sustained duration of response
7 and ultimately translates to improvements in
8 long-term outcomes.

9 The key data we'll share today come from two
10 large randomized controlled studies, DREAMM-7 and
11 DREAMM-8. These phase 3 studies assessed
12 Blenrep-based triplet combinations versus
13 well-known standard of care options, including a
14 daratumumab-based triplet regimen, which is
15 considered a gold standard in the United States.
16 The clinical development program supports the
17 proposed indications shown here, using the study
18 dosing and modification guidance. Throughout the
19 presentation, you'll hear data that supports the
20 positive benefit-risk of Blenrep.

21 Despite the availability of treatment
22 options, multiple myeloma remains an incurable

1 disease, and there's a need for effective therapies
2 with novel mechanisms of action. In two randomized
3 phase 3 studies, Blenrep consistently demonstrated
4 meaningful benefit across all endpoints. The
5 Blenrep combination in DREAMM-7 demonstrated a
6 doubling of complete response and duration of
7 response, a statistically significant two-year
8 improvement in median PFS and a projected
9 three-year improvement in overall survival.
10 Additionally, DREAMM-8 demonstrated a statistically
11 significant improvement in PFS, showing greater
12 than a 20-month benefit in medians along with a
13 positive trend in survival.

14 Importantly, the overall safety of Blenrep
15 in DREAMM-7 and DREAMM-8 is consistent with its
16 well-characterized safety profile. Ocular events
17 associated with Blenrep are reversible with time
18 and effectively managed with dose modifications,
19 allowing patients to remain on treatment and derive
20 benefit; and our proposed risk management strategy
21 will enable patients to have access to treatment
22 while further mitigating the severity of the ocular

1 events in clinical practice.

2 In today's presentation, we'll review data
3 supporting the two key discussion topics raised by
4 the FDA. First, it was indicated that response
5 rates in our dose exploration studies were
6 comparable across doses, and therefore, lower doses
7 may improve patient tolerability. We followed the
8 agency's recommendation at earlier stages of
9 development to evaluate a broad range of exposure
10 to assess if lower doses indeed improved safety
11 while maintaining efficacy. This hypothesis was
12 disproven by the data.

13 The dose and schedule of Blenrep has been
14 extensively studied in almost 400 patients. The
15 proposed 2.5 mg/kg starting dose and use of dose
16 reductions and delays to manage ocular events is
17 the most optimal approach for dosing to gain
18 maximal benefit-risk. The higher starting dose is
19 associated with deeper and more durable responses.
20 It's the VGPR or better responses that translate to
21 improve PFS and overall survival. Lowering the
22 starting dose or using less frequent dosing

1 schedules may modestly improve tolerability, but at
2 a significant loss of efficacy.

3 The risk of ocular events from Blenrep has
4 been observed at all clinically active doses, and
5 while these are unique risks from multiple myeloma
6 treatment, ocular events are observed with other
7 approved ADCs. When considering these events, it's
8 important to understand the true impact they may
9 have on the patient. They are microcyst-like
10 deposits on the cornea most commonly found on
11 ocular exam.

12 These events are transient and reversible
13 through dose modifications, and they have not
14 resulted in permanent bilateral vision loss with
15 more than 7500 patients treated to date.
16 Importantly, our proposals for labeling and risk
17 management will further address tolerability
18 without impact to efficacy.

19 With this background, here is the agenda.
20 We also have additional responders here today to
21 help address your questions. Thank you.
22 Dr. Richardson will now review the unmet need.

Applicant Presentation - Paul Richardson

DR. RICHARDSON: Thank you, Dr. Abdullah.

3 My name is Dr. Paul Richardson, and I serve
4 as the Clinical Program Leader and Director of
5 Clinical Research at Dana-Farber Cancer Institute,
6 and I'm the RJ Coleman Professor of Medicine at
7 Harvard Medical School.

I was a co-investigator of the DREAMM-1 and
DREAMM-2 studies, and I serve as principal
investigator of DREAMM-5 and have been a leading
enroller in the expanded access program at
Dana-Farber for Blenrep. Thus, I have extensive
experience with Blenrep and other targeted agents
in this setting, and I greatly appreciate the
opportunity to frame the unmet medical need our
patients continue to face with this challenging
disease.

18 Now, over the last 15 years, survival has
19 improved significantly but, unfortunately, myeloma
20 still remains clearly incurable. Before 2010, our
21 patients typically only survived between
22 2 to 5 years, and at most, seven. Median overall

1 survival among relapsed/refractory myeloma patients
2 initiating second-line therapy in the real world
3 is, at best, 50 months at the moment and is
4 significantly lower for patients with cytogenetic
5 and functional high-risk disease.

6 Now, it's been my privilege to have worked
7 to develop many of the approved drugs in the
8 myeloma space, and I've personally witnessed this
9 progress, and this is where, in my view, the
10 sponsor's data really stands out. Specifically,
11 the overall survival reported in Blenrep studies
12 promises to be almost double what's been
13 historically observed and I show in this slide.
14 Critically, this data validates that we continue to
15 need therapies with new mechanisms of action to
16 overcome refractoriness upon relapse.

17 Now, as we think about our treatment options
18 in the modern era, the key classes of approved
19 agents used in multiple myeloma include front-line
20 triplet, or most recently, as Dr. Telaraja pointed
21 out, quadruplet multidrug combinations comprised of
22 three drug classes. These are immunomodulatory

1 agents, proteasome inhibitors, and monoclonal
2 antibodies targeting CD38, including daratumumab
3 and isatuximab.

4 Now, because these treatments are used now
5 in the frontline, disease is thus often refractory
6 to combinations of these classes upon relapse.

7 BCMA-targeted agents are becoming a key new pillar
8 of second-line plus treatment with CAR T-cell
9 therapies, and ciltacel specifically, being the
10 only currently approved option in second line.
11 While bispecifics are up and coming, it's important
12 to note that they are only approved in the
13 late-line setting, four lines and beyond.

14 There is clearly a need for additional
15 BCMA-targeted therapies, in my view, and to expand
16 on this, I share a table of approved therapies in
17 the relapsed/refractory setting adapted from the
18 FDA's briefing document and touched on earlier by
19 Dr. Telaraja.

20 While the first four rows are approved
21 second-line options, this table does not provide
22 the full picture of the treatment landscape. Most

1 of the combination options shown here contain
2 daratumumab, which is increasingly used in
3 front line, as we know, diminishing the
4 effectiveness of these combinations in second line.
5 This of course also applies to lenalidomide, which
6 is universally used as part of induction and
7 maintenance as a standard of care, and I have
8 bolded these combinations in blue for emphasis.
9 Thus, it's vital to have CD38 and
10 lenalidomide-sparing combination approaches with
11 different mechanisms of action to successfully
12 salvage our patients.

13 This leaves us with ciltacel as our only
14 approved second-line treatment approach, and this
15 does indeed show survival improvement and is where,
16 in my view, Blenrep would clearly fit in,
17 particularly for those patients who are not
18 eligible for CAR T or for whom CAR T is not
19 feasible.

20 Now, as we think about ciltacel, overall
21 survival benefit is indeed seen, and despite the
22 benefits observed with ciltacel, I think it's

1 important to note the serious limitations that
2 CAR T treatments also have.

3 Cell-based therapies are not universally
4 accessible or appropriate for all patients.

5 Treatment is administered at specialized cancer
6 centers with, in fact, less than 20 percent of our
7 patients having access. Each also require
8 individual manufacturing, which can take weeks.
9 This leaves patients with relapsed/refractory
10 disease at risk not only for disease progression,
11 but actually also disease-related mortality while
12 waiting for their cellular therapy.

13 Now, notably, in the pivotal phase 3 trials,
14 approximately 15 percent of patients in the
15 CAR T-cell arms of these studies did not receive
16 cell infusions prior to the trial endpoints,
17 supporting this concept. So CAR T therapy also
18 requires patients who are fit enough to tolerate
19 lympho-depleting chemotherapy, and this leaves our
20 older and frailer patients in search for other
21 viable options.

22 These treatments are also associated with,

1 unfortunately, life-threatening toxicities. This
2 includes ICANS; CRS or cytokine release syndrome;
3 and I think most worrisome, late-onset
4 Parkinsonism; serious severe enterocolitis; and
5 secondary malignancies.

6 Now, additionally -- and this is very
7 important -- the most recent real-world data points
8 to a 10 percent non-relapse mortality rate with
9 CAR T treatment. I have experienced treating
10 patients with Blenrep and CAR T and have seen the
11 benefit-risk of both, and I would deeply appreciate
12 having both options available for my patients given
13 all of these considerations. So when we consider a
14 new treatment for relapsed/refractory myeloma, we
15 must consider how that therapy will actually be
16 used and its ability to integrate into real-world
17 practice.

18 I've already noted the challenges with CAR T
19 therapy. We need a treatment that could be
20 administered not only at academic or specialized
21 centers but also in the community setting without
22 the need for hospitalization, providing what I

1 consider a true off-the-shelf capability; and we
2 should consider the current treatment landscape of
3 approved agents and the ease of integration with
4 other drugs. There's particular value for
5 accessible options in vulnerable patient subsets,
6 and I think this is very clear.

7 As we think about this going forward, this
8 may be the type of platform that should in no way
9 be underestimated in terms of its value. From my
10 personal experience, Blenrep is indeed a tolerable
11 drug with profound and undeniable efficacy, and
12 especially when given in combination, and above
13 all, manageable side effects.

14 Thank you. And I'll now turn the
15 presentation to Dr. Mukhopadhyay.

16 **Applicant Presentation - Pralay Mukhopadhyay**

17 DR. MUKHOPADHYAY: Thank you,
18 Dr. Richardson.

19 Good morning. I'm Pralay Mukhopadhyay, Vice
20 President and Medicine Development Lead for Blenrep
21 at GSK. Let me review the efficacy data beginning
22 with the dose justification.

1 The dose and schedule for Blenrep has been
2 extensively studied in nearly 400 participants.
3 Considering prior FDA advice, we have assessed a
4 range of doses, including from 1.9 mg/kg to
5 3.4 mg/kg, and a range of schedules from every
6 3 to 4 weeks to extended schedules of every 6, 8,
7 or 12 weeks.

8 Across all studies, the starting dose of
9 2.5 mg/kg and a more frequent schedule of Q3 or
10 Q4 weeks, followed by subsequent AE-guided dose
11 modification, were associated with deeper response
12 and clinically meaningfully longer progression-free
13 survival. Though lower or less frequent starting
14 doses and schedules were associated with a modest
15 improvement in safety, ocular events were observed
16 across all doses and schedules studied.

17 There was not a meaningful difference in
18 incidence of grade 2 plus keratopathy or AEs
19 leading to discontinuation. Ocular events were
20 effectively managed through dose modifications,
21 allowing participants to remain on treatment and
22 benefit from Blenrep therapy. The extent of dose

1 modification was high and variable across all doses
2 and schedules studied, resulting in a median
3 relative dose intensity typically between 40 to
4 60 percent.

5 Here, I show the data from one of the
6 dose-finding studies, DREAMM-6, in combination with
7 bortezomib-dexamethasone in the second-line
8 population that also included the dose assessed in
9 the DREAMM-7 study. You can see, the 2.5 mg/kg
10 starting dose at the Q3-week dosing schedule showed
11 improved depth of response compared to the lower
12 dose or even same dose at longer interval. FDA's
13 briefing document states that observed trends in
14 efficacy and safety across these studies indicate
15 that overall response rates were comparable, but
16 the field knows that deeper responses -- VGPR,
17 complete response, and stringent complete
18 response -- are critical for eliciting long-term
19 clinical benefit with PFS and overall survival.

20 When considering safety, grade 3 ocular AEs
21 and discontinuation data showed similar outcomes
22 across doses and schedules assessed, and we saw

1 consistent findings from the ALGONQUIN study in
2 combination with pom-dex, which informed the dosing
3 used in DREAMM-8. Higher starting doses and
4 shorter starting frequency reduced the deepest
5 responses. Lowering the dose or frequency improves
6 tolerability, but ocular events are observed across
7 all dose and schedules.

8 The DREAMM-14 study was a randomized
9 monotherapy dose optimization study in a
10 fourth-line-plus population, where patients had to
11 be refractory to all three classes of the most
12 active myeloma agents. This study continues to
13 show the same trends, supporting the efficacy of
14 the 2.5 mg/kg Q3-week starting dose and schedule.

15 FDA mentioned in their briefing document
16 that the ORR in DREAMM-14 was similar across arms
17 with overlapping confidence intervals. This is
18 true even for rates of VGPR-plus because it's
19 difficult to see high response rates in such a
20 heavily pretreated population; however, the
21 randomized nature of the trial allows for a more
22 comprehensive evaluation of PFS as well. You'll

1 notice that the median PFS in the 2.5 mg/kg Q3-week
2 arm is 5.7 months, which is more than double the
3 other doses.

4 We also assessed dosing through
5 exposure-response analysis. An integrated
6 exposure-response analysis using data from
7 DREAMM-6, 7, and 8 confirmed the clinical findings,
8 demonstrating that higher Cycle 1 exposure was
9 positively associated with deeper response; and
10 though there was a modestly increasing trend in
11 ocular safety parameters, the slope of the exposure
12 efficacy curve was much steeper than for the
13 exposure safety curve. Therefore, there's a
14 significant trade-off in efficacy while modest
15 benefit in safety by starting at a lower dose.

16 Based on the totality of the clinical data
17 and the integrated ER analysis, a starting dose of
18 2.5 mg/kg and a starting schedule of every
19 3 or 4 weeks was selected in the two phase 3
20 studies to elicit deeper and durable responses,
21 followed by subsequent management of toxicities
22 through dose holds or reductions. These dosing

1 recommendations led to robustly positive efficacy
2 outcomes and a consistent and manageable
3 tolerability profile in both studies.

4 FDA showed simulation results based on
5 M protein to conclude that response rates were
6 similar across doses and schedules. Here, we
7 present the more clinically relevant endpoint of
8 PFS from these simulations.

9 There was a meaningful loss in efficacy with
10 lower starting doses and less frequent schedules;
11 therefore, based on the totality of the clinical
12 data, exposure-response analyses, and simulations,
13 it's clear that a 2.5 mg/kg starting dose given
14 every 3 to 4 weeks, followed by subsequent dose
15 modifications, maximizes efficacy while having a
16 manageable tolerability profile.

17 Let me now share the data from the DREAMM-7
18 and DREAMM-8 studies.

19 DREAMM-7 and DREAMM-8 shared a similar
20 design, with both studies being global,
21 multicentered, open-label randomized trials,
22 evaluating Blenrep in combination with the standard

1 of care triplet treatment. Patients in both
2 studies were randomized 1 to 1 to a Blenrep triplet
3 versus a standard of care triplet.

4 In DREAMM-7, the starting dose was 2.5 mg/kg
5 once every 3 weeks for the first 8 cycles, followed
6 by monotherapy, Blenrep or daratumumab, starting in
7 Cycle 9. In DREAMM-8, the starting dose of Blenrep
8 was again 2.5 mg/kg for Cycle 1. We used a
9 proactive step-down to 1.9 mg/kg once every 4 weeks
10 starting in Cycle 2. When a grade 2 or higher
11 ocular event occurred, dosing would switch to
12 1.9 mg/kg every 8 weeks.

13 Regardless of the different dose and
14 schedules, both studies showed similar efficacy and
15 safety findings. The primary endpoint in both
16 studies was progression-free survival. Key
17 secondary endpoints were overall survival, duration
18 of response, and MRD, and both studies had balanced
19 enrollments between arms.

20 Let's review the results.

21 Both the DREAMM-7 and the DREAMM-8 studies
22 met their primary endpoint of progression-free

1 survival. There is clear and early separation
2 between the treatment groups in favor of Blenrep
3 across time points. In DREAMM-7, shown on the
4 left, there was nearly a two-year improvement in
5 median PFS with Blenrep at 36.6 months compared to
6 13.4 with DVd. In DREAMM-8, the median PFS for
7 Blenrep had not been reached at the time of the
8 primary analysis, but the median PFS for PVd was at
9 12.7 months. We also have additional follow-up
10 data on PFS since the primary analysis, where the
11 median PFS is now at 33 months for BPd and remains
12 the same for PVd.

13 Importantly, consistent PFS benefit was
14 observed across subgroup, favoring Blenrep
15 combinations in both studies, including those with
16 poor clinical outcomes such as those refractory to
17 lenalidomide and those with high-risk cytogenetics.
18 These results translated into overall survival
19 improvements that favored Blenrep in both studies.

20 In DREAMM-7, Blenrep demonstrated a
21 statistically significant 42 percent reduction in
22 the risk of death, and while medians had not been

1 reached, the data show a projected three-year
2 improvement in median overall survival based on the
3 recent interim analysis. At the time of this
4 analysis, there were 13 percent or 35 more deaths
5 in the comparator arm. The DREAMM-8 OS showed a
6 positive trend at the first interim analysis and
7 follow-up for OS is currently ongoing.

8 In both studies, Blenrep achieved a
9 5 to 10 percent greater ORR than the comparator
10 arm. More importantly, Blenrep combinations
11 achieved much deeper responses over standard of
12 care, with a 20 to 25 percent added improvement in
13 VGPR or better rates in both studies. This
14 reinforces the importance for making dosing
15 decisions based on depth of response, further
16 supporting the recommended starting dose and
17 schedule.

18 A 2 and a half to 5-fold improvement in
19 minimal residual disease was observed over the
20 standard of care. This finding is consistent with
21 the learnings from the FDA 2024 ODAC on the
22 importance of MRD as an intermediate endpoint for

1 predicting PFS and OS, and in DREAMM-7, Blenrep
2 combinations doubled the median duration of
3 response. In DREAMM-8, median DOR was not reached
4 for BPd while it was 17 and a half months for PVd.

5 To summarize, the DREAMM-7 and DREAMM-8
6 studies demonstrated a statistically significant
7 and clinically meaningful improvement in Blenrep
8 combinations when compared to standard of care.
9 Both studies met their primary endpoint of PFS,
10 with a PFS hazard ratio of 0.41 in DREAMM-7 and a
11 median PFS that's 2 and a half times longer than
12 the U.S. gold standard treatment of daratumumab.
13 Importantly, DREAMM-7 demonstrated a 42 percent
14 reduction in the risk of death, and while median OS
15 had not been reached in either arm, it is projected
16 to have a three-year improvement in median overall
17 survival based on the current data.

18 DREAMM-8 demonstrated a 48 percent reduction
19 in the risk of progression. And while the median
20 had not been reached at the first interim analysis,
21 with updated follow-up, the median was at
22 32.6 months and data were trending positively for

1 overall survival. These robust efficacy results
2 were demonstrated using the recommended starting
3 dose and dose modifications.

4 Thank you. I will turn the presentation to
5 Dr. Afshari to contextualize the ocular events.

6 **Applicant Presentation - Natalie Afshari**

7 DR. AFSHARI: Thank you.

8 I'm Natalie Afshari, Chief of Cornea and
9 Refractive Surgery at the University of California,
10 San Diego. I am a practicing ophthalmologist
11 subspecializing in cornea and a clinician scientist
12 with an active laboratory, studying corneal
13 endothelium and corneal epithelium. I've also
14 previously sat on FDA eye-related advisory
15 committees. I've treated many patients who have
16 received ADCs, including Blenrep.

17 In order to understand the ocular events
18 associated with Blenrep, let's start with the
19 anatomy of a normal eye. The cornea, shown in
20 yellow, is the clear front window of the eye. This
21 cross-sectional area shows that cornea has several
22 layers, each with specific functions. The clinical

1 events occurred in the outermost layer, the
2 epithelium. Like skin, the epithelium regenerates
3 naturally, so issues here are usually
4 self-limiting.

5 Now, let's look at the pathophysiology
6 behind Blenrep-related eye events. Blenrep causes
7 microcyst-like changes in the corneal epithelium
8 seen on slit-lamp exam on the left. These may occur
9 without symptoms but can affect vision depending on
10 severity and location. They begin in the
11 peripheral epithelium, then move toward the center,
12 where they may impact vision. As new cells grow
13 from the periphery inward, older cells are replaced
14 and vision recovers. It's this pathophysiology
15 that supports the resolution of ocular events
16 associated with Blenrep.

17 GSK developed the Keratopathy and Visual
18 Acuity, KVA, grading scale to detect ocular events
19 early, even in patients without symptoms. It
20 assesses severity in two ways: first, visual
21 acuity measured by the number of Snellen lines that
22 are lost from baseline on the Snellen chart, and

1 second, slit-lamp exam based on the location and
2 density of microcyst in each eye.

3 This scale is very both intuitive and very
4 sensitive, helping guide Blenrep dose adjustments.

5 In my experience with multiple drug studies, it
6 offers a thorough way to assess eye findings in
7 each eye. Since eyecare professionals already use
8 Snellen and slit-lamp exams, they can readily adopt
9 this scale to support dosing decisions.

10 To summarize, ocular events with Blenrep are
11 easily identified. While these findings may be
12 unfamiliar to some oncologists or new in myeloma,
13 eyecare providers can easily detect them with a
14 standard slit-lamp exam. Similar defects are seen
15 with other ADCs and often occur without symptoms.
16 Routine eye exams, checking each eye separately or
17 unilateral testing, can detect these changes;
18 however, bilateral vision, or how both eyes work
19 together, has the greatest impact on patients, as
20 the better eye can compensate for the other.

21 The KVA scale uses the worst eye to guide
22 those adjustments while also considering changes in

1 both eyes to assess overall vision impact. This
2 helps eyecare providers detect issues early and
3 support patients in staying on treatment
4 comfortably. Crucially, these findings are
5 reversible. Dose holds allow the epithelium to
6 regenerate and the cornea to heal.

7 Thank you, and Dr. Rasheed will now review
8 the sponsor's safety data.

9 **Applicant Presentation - Zeshaan Rasheed**

10 DR. RASHEED: Thank you, and good morning.
11 My name is Zeshaan Rasheed. I'm a medical
12 oncologist and Senior Vice President and Head of
13 Oncology Clinical Development at GSK. We have
14 extensively evaluated Blenrep's safety profile,
15 including in-depth evaluation of ocular events,
16 throughout our clinical program. Our deep dive
17 into the data, coupled with insights from leading
18 ophthalmology experts and investigators, has
19 allowed us to develop a robust and multifaceted
20 risk mitigation strategy to effectively manage
21 these events and ensure patient safety. I will
22 begin by providing a brief overview of the safety

1 data.

2 Overall, more patients in the Blenrep arms
3 of DREAMM-7 and 8 had grade 3 and 4 AEs, SAEs, and
4 AEs leading to discontinuation. Most patients had
5 AEs leading to dose modification across all arms,
6 which is common in myeloma. Because patients in
7 the Blenrep arms had a longer duration of exposure
8 to study treatment, as would be expected based on a
9 longer PFS, we also analyzed exposure-adjusted AEs.
10 When adjusted for exposure, you can see that rates
11 of AEs and SAEs between arms are relatively
12 similar.

13 I will now focus on the ocular events and
14 their management.

15 We collected various types of ocular data
16 throughout our program. We collected data based on
17 symptoms reported by patients and graded them using
18 the standard CTCAE criteria. Also, as Dr. Afshari
19 described, GSK developed the KVA scale in
20 collaboration with FDA, which assesses corneal exam
21 findings and BCVA changes. Dose modifications to
22 Blenrep were recommended based on the most severe

1 grade and severe eye from either the slit-lamp exam
2 or the visual acuity test.

3 The regular ocular monitoring and sensitive
4 nature of the KVA scale enabled timely intervention
5 and prevention of severe events. Dose
6 modifications occurred in about 83 percent of
7 patients. In both studies, almost all patients had
8 a dose interruption and about half had a dose
9 reduction. The median dose hold was 8 weeks, and
10 it enabled about 90 percent of patients to continue
11 treatment while maintaining efficacy.

12 Grade 2 or greater KVA events were common,
13 including recurrent events, and despite multiple
14 KVA events, there was a consistent pattern of
15 resolution. The majority of events resolved with
16 adequate follow-up, and the time to resolution for
17 the first and subsequent events was consistent at a
18 median of 3 to 4 months.

19 Overall, in the more than 5,300 exams
20 performed, 899 events were identified.

21 Eighty-seven percent of all patients' events
22 resolved at the time of data cutoff; and of the

1 remaining patients whose KVA event did not resolve
2 by the data cutoff, the majority were either still
3 in follow-up and some had died or withdrew from the
4 study. This prevented complete data capture of the
5 resolution data.

6 We also saw similar data in DREAMM-8. In
7 the FDA's briefing document, they focused on
8 resolution of the last event. We know KVA events
9 take time to resolve, and the last events are the
10 closest to data cutoff, so it makes sense that the
11 rate of resolution appears lower. However, when
12 you consider all prior events, including the first
13 five as shown on this slide, we see a high rate of
14 resolution with adequate follow-up. We can
15 therefore predict the pattern of resolution would
16 be the same for the last events as well.

17 On the KVA scale, not all corneal findings
18 translate into clinically meaningful reductions in
19 visual acuity. Ninety-three to 95 percent of
20 patients had a KVA exam finding in DREAMM-7 and 8.
21 About one-third of patients had a bilateral BCVA
22 reduction to 20/50 or worse, which is a clinically

1 meaningful change to their vision, and less than
2 percent, or 7 patients, across both studies had
3 changes to 20/200.

4 Of the 35 percent of patients who had 20/50
5 or worse bilateral events, these events were
6 transient. Almost all patients had documented
7 improvement, and the vast majority of the patients
8 achieved resolution. The median time to
9 improvement was about 3 weeks, and the median time
10 to resolution was about 2 to 3 months. Of the
11 5 patients who had 20/200 or worse, all improved,
12 and all but one had documented resolution at the
13 time of data cutoff.

14 We also collected ocular CTCAE data. You
15 can see the most commonly reported ocular AEs here
16 are consistent with the known profile of Blenrep.
17 These include symptoms that can affect a patient's
18 quality of life. Notably, the majority of ocular
19 AEs resolved or were resolving at the time of
20 follow-up.

21 To provide a direct window into how patients
22 experience changes with treatment, we also

1 implemented four PRO assessments to assess the
2 frequency, severity, and bother of these ocular
3 events. Consistent with the known safety profile
4 of Blenrep, there were more frequent reports of
5 visual changes and select symptoms and impacts
6 versus the control arm.

7 The overall burden of side effects peaked
8 around month 4 across both arms, after which they
9 trended lower, likely due to the institution of
10 supportive care, dose modification, or dose delay
11 and interruption. However, when it came to
12 physical functioning or disease-specific symptoms
13 that would impact on patients' day-to-day
14 activities and health-related quality of life such
15 as pain, walking, or self-care, there was a delay
16 in time to clinically meaningful deterioration in
17 the Blenrep-treated arms versus the comparator.

18 Median time to sustained meaningful
19 deterioration in the physical functioning and
20 disease symptoms scores were 2 and a half to
21 3 times longer for patients receiving Blenrep, and
22 although patients reported more impact associated

1 with blurred vision, when it comes to meaningful
2 delay in disease-specific symptoms like pain and
3 physical functioning, the Blenrep combinations had
4 significant advantage.

5 We have developed a comprehensive risk
6 management strategy to ensure safe use of Blenrep.
7 This is based on our vast experience in more than
8 7,500 patients across multiple clinical trials and
9 the earlier postmarketing setting. All of these
10 data have allowed us to better understand the AE
11 profile to best inform patients and healthcare
12 professionals on the benefits and risks of Blenrep
13 as they navigate the treatment of
14 relapsed/refractory multiple myeloma.

15 Physicians and patients are to be educated
16 prior to Blenrep treatment such that they will be
17 vigilant and readily recognize important ocular
18 symptoms. Patients will receive ocular exams as
19 part of Blenrep treatment per labeling. Clinicians
20 will confirm that an ocular exam has been performed
21 and then can hold or reduce therapy based on either
22 the eye exam findings or their clinical assessment.

1 In addition, we will provide dose
2 modification guidance in the Blenrep label, which
3 is based on our experiences in the phase 3 clinical
4 trials. Grade 2, 3, and 4 events would result in
5 the Blenrep dose being held until resolution to
6 grade 1 and then resumed at lower dose, and for
7 grade 4 events, discontinuation of Blenrep can also
8 be considered.

9 To conclude, Blenrep has a
10 well-characterized and manageable safety profile.
11 Ocular events are common and can be identified and
12 managed with dose holds and modifications. They
13 are reversible with appropriate follow-up and allow
14 patients to continue treatment and receive benefit.
15 Based on the data, permanent bilateral vision loss
16 has not been observed. Despite transient impacts
17 to vision, patients' quality of life was maintained
18 overall from baseline. Based on our data and
19 experience, we have proposed a comprehensive ocular
20 risk management strategy to support the safe use of
21 Blenrep in clinical practice.

22 Thank you. I will now turn the presentation

1 to Dr. Lonial to conclude with his clinical
2 perspective.

3 **Applicant Presentation - Sagar Lonial**

4 DR. LONIAL: Thank you very much.

5 I'm Sagar Lonial, Professor and Chair in the
6 Department of Hematology and Medical Oncology and
7 the Chief Medical Officer for the Windship Cancer
8 Institute of Emory University in Atlanta, Georgia.

9 I've worked in the myeloma field for over 25 years
10 and have been a part of the evolution of treatments
11 improving outcomes in our field. I was principal
12 investigator for an earlier trial with bela-maf,
13 and I appreciate the opportunity to share my
14 clinical perspective on the data just discussed.

15 As you heard, while patients with relapsed
16 and refractory myeloma have several different
17 treatment options upon first relapse, myeloma
18 remains an incurable disease that will ultimately
19 progress. Effective therapies with novel
20 mechanisms of action that offer deep and durable
21 responses, which can ultimately extend survival,
22 are still needed for many of our patients. All

1 current second- and third-line options come with
2 toxicities. It's important to understand the
3 benefits and risks of each as we work with our
4 patients to provide the best suited option for
5 them.

6 As oncologists, we often ask if the efficacy
7 observed is meaningful; can safety events be dealt
8 with by physicians and patients; and in this case,
9 what are the impacts of ocular events on the
10 patient and how will dose modifications help manage
11 and mitigate that toxicity? We also consider how
12 the benefit-risk profile compares with other
13 potential options. Addressing these questions
14 allows me, the clinician, the opportunity to have
15 an open dialogue with my patients regarding that
16 risk-benefit profile of patients available as we
17 move forward. So first, let's focus on the
18 benefits.

19 Both phase 3 trials demonstrated impressive,
20 more than two-year improvements in progression-free
21 survival when using the recommended dose and
22 schedule with modifications. The results were

1 consistently improved across all endpoints,
2 including overall response rate, duration of
3 response, MRD negativity, progression-free
4 survival, and overall survival. These results
5 validate the dose modification scheme outlined in
6 DREAMM-7 and in DREAMM-8 and are among the longest
7 progression-free survivals seen in any randomized
8 phase 3 trial in early relapsed myeloma.

9 The overall survival data from DREAMM-7 is
10 also impressive when the starting dose is
11 2.5 mg/kg, again, with appropriate dose
12 modifications, and is further supported by the
13 early data observed in DREAMM-8. This magnitude of
14 benefit is not observed with most currently
15 available treatment combinations.

16 The next question, then, is can the ocular
17 events, which are the main safety considerations,
18 be addressed? From the treating oncologist
19 perspective, I agree that these events can be
20 addressed and mitigated as described by
21 Dr. Afshari. What we've learned over the last five
22 years is to adjust the dose and schedule based on

1 ocular exams and what our patients are telling us.
2 By doing this, we're able to provide patients a
3 more tolerable safety profile with continued
4 efficacy.

5 While ocular events were frequent with
6 bela-maf, they did not result in significant
7 changes in visual acuity in close to 70 percent of
8 patients. Additionally, vision returned to
9 baseline or near baseline with sufficient
10 follow-up. We have clear and practical guidance on
11 how to modify the dose, whether it be with a hold
12 or a dose reduction. In fact, the clinical data
13 demonstrate that patients still achieved meaningful
14 response and duration regardless of dose holds.
15 This would not have been the case if the ocular
16 toxicity was such that patients could not gain
17 benefit from treatment.

18 Dose modifications are a common practice in
19 medicine, and in oncology particularly. They
20 should be viewed as an effective means to allow
21 patients to remain on treatment and gain benefit
22 rather than a problem with the drug itself. If the

1 treatment was too toxic, no amount of efficacy
2 could overcome the risk, and it would bear out in
3 the efficacy endpoints, including resulting in a
4 worse overall survival and shorter progression-free
5 survival. That was not the case in DREAMM-7 and
6 DREAMM-8.

7 While there are four trials that use
8 CD38-based combinations in early relapse, their
9 relative efficacy will be diminished, as previously
10 described, because of the standard adoption of CD38
11 antibodies as part of front-line therapy, so the
12 best comparable agent in early relapsed myeloma is
13 CAR T cell. And while you see this is an indirect
14 comparison, you can see that the bela-maf PFS, DOR,
15 and overall survival is in line with this treatment
16 approach, and without many of the known and more
17 challenging side effects currently observed with
18 CAR T-cell therapy. I just want options for my
19 patients, and, clearly, bela-maf can be an
20 important contribution to the treatment landscape
21 for a large number of patients.

22 To conclude, the data presented today

1 demonstrate that there's a positive benefit-risk
2 profile for bela-maf. Not only is it important to
3 live longer, we want them to live better. My
4 patients have told me that their QoL is maintained
5 with transient impacts on visual acuity, regardless
6 of what the ocular microcyst might look like under
7 a slit-lamp exam.

8 When patients are on therapy, they will
9 likely experience some form of an ocular event,
10 which can be managed in partnership with our
11 eyecare colleagues. The bela-maf safety profile is
12 well characterized and has been extensively
13 studied. The ocular events found on exam are
14 observed even if the patient is without symptoms.
15 These exam findings do not always correlate with
16 meaningful long-term sustained loss of vision and
17 are reversible with time.

18 For perspective, every treatment has some
19 toxicity. We saw that on the FDA introductory
20 presentation where even the control arms of
21 DREAMM-7 and DREAMM-8 had significant dose
22 reductions and modifications. The key question is,

1 can that toxicity be addressed, and does mitigation
2 reduce efficacy? In the case of mitigation, in
3 this case, it does not impact clinical benefit, as
4 evidenced by the long progression-free survival in
5 both trials.

6 When on therapy, patients across all
7 subgroups are also likely to experience meaningful
8 benefit, even those who would not have accessible
9 options in today's treatment landscape. The
10 improved progression-free survival supports
11 bela-maf's unique activity and translates into
12 substantial improvements in overall survival,
13 demonstrating at least a 2- to 3-year benefit.
14 Improvement in minimal residual disease also
15 favored bela-maf, further reinforcing the ability
16 to attain deep responses. Deep and durable
17 responses drive the survival benefit we are seeing
18 in DREAMM-7 and DREAMM-8.

19 Despite all the advances we've seen in
20 myeloma, the disease continues to relapse in most
21 patients, and there remains high morbidity and
22 mortality upon relapse. Considering the robust

1 efficacy and well-characterized and addressable
2 safety profile, bela-maf represents an accessible
3 BCMA targeting treatment option for patients with
4 second-line plus relapsed and refractory myeloma,
5 and I look forward to again having this option to
6 offer my patients. Thank you for your time and
7 your attention.

8 DR. VASAN: We will now proceed with FDA's
9 presentation, starting with Dr. Andrea Baines.

10 **FDA Presentation - Andrea Baines**

11 DR. BAINES: Good morning. My name is
12 Dr. Andrea Baines, and I'm a hematologist and a
13 clinical reviewer in the Division of Hematologic
14 Malignancies II at the FDA. I'll also be joined
15 for part of the FDA presentation by Dr. William
16 Boyd from the Division of Ophthalmology and by
17 Dr. Ankit Shah from the Division of Cancer
18 Pharmacology I.

19 This presentation represents the collective
20 input of members of the FDA review team. My
21 presentation will include a brief background and
22 key points from the regulatory history for

1 belantamab mafodotin, including the initial
2 approval and withdrawal, concerns with ocular
3 toxicity and dosing, and the proposed patient
4 population and current treatment landscape. I'll
5 then briefly review the results and trial designs
6 from DREAMM-7 and DREAMM-8, and will then focus on
7 the major issues for discussion, specifically the
8 high rates of ocular toxicity and the uncertainty
9 regarding the proposed dosages for belantamab
10 mafodotin. I'll end with the discussion of the key
11 benefit-risk considerations.

12 As you've heard, belantamab mafodotin is a
13 BCMA-directed antibody and microtubule inhibitor
14 conjugate. The two proposed indications are for
15 the treatment of adults with multiple myeloma in
16 combination with bortezomib and dexamethasone in
17 patients who have received at least one prior line
18 of therapy, and in combination with pomalidomide
19 and dexamethasone in patients who have received at
20 least one prior line of therapy, including
21 lenalidomide.

22 The proposed dosage of belantamab mafodotin

1 differs between the two regimens. The proposed
2 dosage in the BVd regimen is 2.5 milligrams per
3 kilogram IV once every 3 weeks. The proposed
4 dosage in the BPd regimen is 2.5 milligrams per
5 kilogram IV once, followed by a decrease to
6 1.9 milligrams per kilogram once every 4 weeks from
7 Cycle 2 onward. In both regimens, the belantamab
8 mafodotin is continued until progression or
9 unacceptable toxicity. In the BVd regimen,
10 bortezomib and dexamethasone are only continued for
11 the first 8 cycles. In the BPd regimen,
12 pomalidomide and dexamethasone are continued
13 throughout all cycles.

14 Belantamab mafodotin received accelerated
15 approval in August 2020 as monotherapy for a
16 late-line indication in patients who had received
17 at least four prior therapies, including an
18 anti-CD38 monoclonal antibody, proteasome
19 inhibitor, and immunomodulatory agent. The
20 approved dose, 2.5 milligrams per kilogram IV once
21 every 3 weeks, was the lower of the two doses that
22 were evaluated in the phase 2 trial that supported

1 the approval.

2 As noted previously, due to significant
3 concerns with ocular toxicity in dosing, the
4 application was discussed at an ODAC. The
5 committee advised that the benefit outweighed the
6 risk of ocular toxicity in the proposed patient
7 population, in the context of a proposed risk
8 evaluation and mitigation strategy or REMS.
9 Ultimately, belantamab mafodotin was approved for a
10 late-line indication with a comprehensive REMS with
11 elements to assure safe use and with a
12 postmarketing requirement to conduct a randomized
13 phase 2 trial to evaluate lower doses or
14 alternative dosing regimens.

15 Under the accelerated approval pathway, a
16 postmarketing requirement to conduct a randomized
17 phase 3 trial to verify and describe clinical
18 benefit was also issued. The applicant proposed
19 DREAMM-3, a randomized phase 3 trial evaluating
20 belantamab mafodotin at the same dose of
21 2.5 milligram per kilogram once every 3 weeks
22 versus pomalidomide and dexamethasone, to serve as

1 the confirmatory trial; however, in November 2022,
2 top-line results show that the DREAMM-3 trial
3 failed to meet its primary endpoint of
4 progression-free survival. The PFS hazard ratio
5 was 1.03 and the OS hazard ratio was 1.14.

6 Belantamab mafodotin was subsequently,
7 voluntarily withdrawn from the market due to
8 failure of the confirmatory trial to verify
9 clinical benefit. Although the reasons for failure
10 of the DREAMM-3 trial to meet its primary endpoint
11 are not clear, it is possible that poor
12 tolerability of the 2.5 milligram per kilogram once
13 every 3 weeks dosage may have negatively impacted
14 the efficacy of belantamab mafodotin monotherapy.

15 To highlight an important difference for the
16 current application, the previous application was
17 approved for a late-line indication in patients who
18 have received at least four prior therapies,
19 including an anti-CD38 monoclonal antibody,
20 proteasome inhibitor, and immunomodulatory agent.
21 In contrast, the currently proposed indication is
22 for a much less refractory population of patients

1 who have received at least one prior line of
2 therapy.

3 It is important to note that there are
4 multiple approved therapies for patients with
5 relapsed and refractory multiple myeloma who have
6 received one or more prior lines of therapy and
7 others approved for later-line settings, including
8 multiple combination regimens and other
9 BCMA-directed therapies. Several of these regimens
10 have demonstrated overall survival benefits in
11 randomized trials, and many of the more recently
12 approved therapies, including CAR T-cell products
13 and bispecific CD3 T-cell engagers, are currently
14 being evaluated in randomized trials in early-line
15 settings.

16 Although DVd is approved for patients who
17 have received one prior line of therapy, the
18 increasing usage of quadruplet regimens containing
19 both daratumumab and bortezomib in front-line
20 therapy in the U.S., has limited usage of DVd in
21 the second-line and beyond setting. PVd, which is
22 not an approved regimen in the U.S., also has

1 limited usage in this setting.

2 There have been significant advances in the
3 treatment of multiple myeloma over the past two
4 decades. Some of the therapies in the first half
5 of this timeline, which were considered novel at
6 that time, have since become standard of care; and
7 we now have a whole new set of novel therapies,
8 including multiple CAR T-cell products and
9 bispecific CD3 T-cell engagers, that were approved
10 in the last five years.

11 Correspondingly, there have been substantial
12 improvements in overall survival for patients
13 diagnosed with multiple myeloma in recent decades,
14 as shown in this figure, based on SEER data
15 collected between 2000 and 2019. It is now thought
16 that patients with newly diagnosed multiple myeloma
17 in the U.S. have a median overall survival
18 approaching 10 years. With the approval of
19 multiple new therapies in recent years, many of
20 which are currently being evaluated in early-line
21 settings, further large improvements in overall
22 survival are anticipated.

1 That brings us to the designs of the pivotal
2 trials for the current application. DREAMM-7 is a
3 phase 3 randomized trial evaluating belantamab
4 mafodotin, bortezomib and dexamethasone or BVd,
5 versus daratumumab, bortezomib and dexamethasone or
6 DVd. The primary endpoint is progression-free
7 survival as assessed by independent review
8 committee, and the key secondary endpoints are
9 overall survival, duration of response, and MRD
10 negativity rate.

11 DREAMM-8 is a phase 3 randomized trial
12 evaluating belantamab mafodotin, pomalidomide and
13 dexamethasone or BPd versus pomalidomide,
14 bortezomib and dexamethasone or PVd; and the
15 primary and key secondary endpoints in DREAMM-8 are
16 the same as in DREAMM-7.

17 Overall, baseline demographics were balanced
18 between arms in both trials; however, there was an
19 underrepresentation of older adults and Black or
20 African American patients and limited U.S.
21 enrollment. Only 14 percent of patients in
22 DREAMM-7 and 18 percent in DREAMM-8 were age 75 or

1 older. In contrast, approximately 33 percent of
2 patients diagnosed with multiple myeloma in the
3 U.S. are age 75 or older.

4 Additionally, while the prevalence of
5 multiple myeloma in Black or African American
6 patients in the U.S. is approximately twice that of
7 non-Hispanic whites, only 4 percent of patients in
8 DREAMM-7 were Black or African American, and no
9 Black or African American patients were enrolled in
10 DREAMM-8. Although both studies were
11 multiregional, fewer than 5 percent of patients in
12 each trial were enrolled in the U.S.

13 As previously described, given the limited
14 usage of DVd and PVd for second-line therapy in the
15 U.S., the selected comparator arms may have
16 impacted the ability to enroll more patients from
17 the U.S. The limited enrollment in the U.S. and
18 questionable relevance of the comparator arms may
19 further limit the applicability of the DREAMM-7 and
20 DREAMM-8 results to the U.S. patient population.

21 The numbers and types of therapies were
22 generally balanced between arms. Approximately

1 half of the patients on each study had received one
2 prior line of therapy. Most patients in both
3 trials had received a prior proteasome inhibitor
4 and immunomodulatory agent, and approximately a
5 quarter of patients in DREAMM-8 received a prior
6 anti-CD38 monoclonal antibody.

7 To briefly summarize again the key efficacy
8 results from DREAMM-7 and DREAMM-8, the primary
9 endpoint of progression-free survival was met in
10 both trials. Overall survival was also
11 statistically significant in DREAMM-7, but OS did
12 not reach statistical significance in DREAMM-8.

13 An overview of the safety in DREAMM-7 and
14 DREAMM-8 is provided here in terms of the rates of
15 treatment-emergent adverse events or TEAEs. In the
16 belantamab mafodotin-containing arms in both
17 trials, over 90 percent of patients had
18 grade 3 or 4 TEAEs, which were higher than the
19 rates in the comparator arms. The rates of serious
20 TEAEs were also higher in the belantamab
21 mafodotin-containing arms. Rates of fatal TEAS
22 were similar between arms in both studies. As

1 we'll discuss further, there were high rates of
2 dose modifications, which were considerably higher
3 in the belantamab mafodotin-containing arms in both
4 studies.

5 That brings us to the specific issues for
6 further discussion. The ocular toxicity seen with
7 belantamab mafodotin is a unique risk to this
8 product that is not seen with any of the currently
9 available therapies for multiple myeloma. There
10 were high rates of ocular toxicity with belantamab
11 mafodotin with a similar incidence and severity
12 across DREAMM-7 and DREAMM-8 despite the lower
13 dosing regimen in DREAMM-8. There were also high
14 rates of dose modifications due to ocular toxicity
15 in both studies.

16 These toxicity and tolerability concerns,
17 coupled with limited data supporting dose selection
18 for DREAMM-7 and DREAMM-8, raise uncertainty
19 regarding the proposed dosages of belantamab
20 mafodotin, and although these two key issues are
21 interrelated, we'll first focus on the ocular
22 toxicity.

1 As you've heard, to allow for a granular
2 assessment of ocular toxicity, the applicant
3 developed the Keratopathy and Visual Acuity, or
4 KVA, scale with input from the FDA. The KVA scale
5 incorporates corneal slit-lamp examination findings
6 and best corrected visual acuity, and the worst
7 grade by either examination method in the worst eye
8 is used to determine the overall grade of the KVA
9 event.

10 The KVA scale was also used to guide dose
11 modifications of belantamab mafodotin. In both
12 trials, dosage modifications were recommended for
13 grade 2 or higher KVA events. And although there
14 are some differences across the two trials on the
15 criteria to resume and/or dose reduce, belantamab
16 mafodotin was generally to be interrupted for
17 grade 2 or higher events and held until improvement
18 to grade 1 or better.

19 I'll now hand the podium over to Dr. William
20 Boyd to provide some additional clinical context.

21 **FDA Presentation - William Boyd**

22 DR. BOYD: Thank you, Dr. Baines.

1 I am Dr. William Boyd. I'm an
2 ophthalmologist. I'm Deputy Director of the
3 Division of Ophthalmology here at the FDA. I'll
4 provide an additional clinical perspective on the
5 ocular toxicity.

6 As noted, the KVA scale divides keratopathy
7 into four grades. Here, we have photographic
8 representations of keratopathy as described in the
9 KVA scale. These images are not for patients
10 treated on the DREAMM-7 or DREAMM-8 clinical
11 trials; they are representative images. The green
12 color in these photos is from fluorescein sodium,
13 which is used to stain devitalized epithelial cells
14 and exposed basement membrane.

15 Beginning in the upper left, grade 1
16 superficial punctate keratopathy, or SPK, shows
17 isolated areas throughout the cornea with
18 devitalized epithelial cells. Below this is
19 confluent SPK, in which the number of affected
20 epithelial cells increases so that discrete areas
21 begin to touch, which may be grade 2 or grade 3
22 depending on severity. Patients may be

1 asymptomatic in earlier stages, but with increasing
2 confluence, the risk of infection and progression
3 to epithelial defects also increases.

4 On the right side, epithelial defects
5 corresponding to grade 4 are shown. In the upper
6 right, you can see a corneal epithelial defect
7 where the central cornea is without epithelium, and
8 in the bottom right you can see a corneal ulcer
9 which has an inflammatory cell infiltrate,
10 increased hyperemia, and possible inflammatory
11 cells in the anterior chamber.

12 Corneal epithelial defects are typically
13 painful and are vision threatening because they may
14 lead to corneal perforation, which is a rupture of
15 the eye, endophthalmitis, an infection within the
16 eye, or loss of the eye if not treated
17 appropriately.

18 Moving on, we'll discuss the best corrected
19 visual acuity considerations on the KVA scale.
20 When assessing visual acuity, ophthalmologists
21 evaluate best corrected visual acuity, or BCVA,
22 which represents the best possible visual acuity

1 that each eye can achieve; and to do this,
2 corrective lenses or contact lenses are utilized.
3 Generally, assessments of visual acuity are
4 performed for each eye separately, and the FDA
5 considers unilateral changes to be clinically
6 relevant for safety analyses.

7 Vision was assessed using the Snellen eye
8 chart as depicted on the left of this slide. On
9 the right of the slide are simulations of various
10 levels of visual acuity. Normal vision is
11 represented by 20/20 on the upper left, it's the
12 clearest vision, and then down to 20/20
13 [sic - 20/200] in the lower right, which is
14 considered legally blind.

15 For context, for an unrestricted driver's
16 license, most states require a minimum visual
17 acuity of 20/40 in at least one eye, and when an
18 individual has visual acuity decreased to 20/70,
19 this frequently results in driving restrictions. A
20 three-line change in vision referred to in the KVA
21 scale, which correlates to at least a grade 2 KVA
22 event, refers to a visual acuity change, which is

1 considered to have clinical significance by the
2 Division of Ophthalmology.

3 Thus, our clinical concerns regarding the
4 ocular toxicity begin with potential for lower
5 grade corneal toxicities to be asymptomatic, making
6 close ophthalmic monitoring important. Higher KVA
7 grade toxicities are more confluent, and are
8 therefore more likely to have inflammatory
9 infiltrates and three or more lines of visual
10 acuity loss. Managing lower and intermediate grade
11 toxicities may minimize progression to higher grade
12 toxicities, which can result in serious outcomes
13 such as corneal ulceration, corneal thinning,
14 corneal perforation, and these are catastrophic
15 outcomes. These points highlight the critical
16 importance of early identification and appropriate
17 management, which includes implementation of dose
18 modifications as indicated.

19 I'll now turn the podium back over to
20 Dr. Baines.

21 **FDA Presentation - Andrea Baines**

22 DR. BAINES: Thanks, Dr. Boyd.

1 With that clinical context in mind, here's
2 an overview of the KVA events from DREAMM-7 and
3 DREAMM-8. Almost all patients had KVA events,
4 including grade 3 or 4 events in over
5 three-quarters of patients, with higher rates of
6 grade 4 events in DREAMM-7. There were also high
7 rates of dose modifications due to KVA events,
8 particularly dose interruptions.

9 Because the dose modifications were
10 implemented for grade 2 or higher KVA events, the
11 results in the next few slides are focused on those
12 events. Although there was a wide range, most
13 patients had their first event within 1 to 2 months
14 after starting treatment, and the events lasted a
15 medium of approximately 3 months. Additionally,
16 most patients experienced recurrent events, with
17 the median of 3 events per patient in both trials.

18 This figure summarizes a hypothetical
19 patient experience with KVA events on DREAMM-7
20 based on the medians I just presented. The upward
21 arrows at the bottom represent the planned
22 treatment schedule based on the once every 3 weeks

1 administration schedule for belantamab mafodotin,
2 with purple arrows representing administered doses
3 and gray arrows representing missed doses due to
4 dose interruptions.

5 Since the median number of grade 2 or higher
6 KVA events per patient was 3, this time line
7 depicts the median time to onset and median
8 duration of each of three grade 2 or higher KVA
9 events relative to the median overall duration of
10 treatment. It illustrates that patients
11 experienced recurrent and active KVA events for a
12 substantial proportion of time on treatment, and
13 these events occurred throughout the treatment
14 course.

15 Considering the high rates of recurrence and
16 the importance of characterizing longer term
17 outcomes of ocular toxicity, the data presented
18 here is based on the outcome of the last grade 2 or
19 higher KVA event. Additionally, given the clinical
20 relevance of assessing complete resolution, this
21 analysis is based on resolution to normal or
22 baseline corneal exam and visual acuity rather than

1 the protocol-defined criteria of resolution to
2 grade 1 or better. As of the data cutoff, 70 and
3 75 percent of patients had ongoing KVA events of
4 which approximately two-thirds had ongoing events
5 after treatment discontinuation.

6 Next, I'd like to discuss the clinically
7 meaningful changes and best corrected visual acuity
8 that were observed, including changes to 20/50 or
9 worse, 20/100 or worse, and 20/200 or worse. In
10 DREAMM-7 and DREAMM-8, over 60 percent of patients
11 experienced a change in best corrected visual
12 acuity to 20/50 or worse. Of note, these changes
13 were not transient. The median duration for all
14 events was 3 to 4 weeks, and for some context, in
15 Maryland, for example, individuals need to have
16 better visual acuity than this to qualify for an
17 unrestricted driver's license.

18 Over a quarter of patients in each trial
19 experienced a more severe change in best corrective
20 visual acuity to 20/100 or worse. For example,
21 this is a level at which individuals may have
22 difficulty with activities such as reading,

1 watching TV, and using a computer, and it is beyond
2 the threshold at which driving restrictions may be
3 required.

4 Lastly, more than 10 percent of patients in
5 both trials experienced a very severe change in
6 best corrected visual acuity to 20/200 or worse,
7 which qualifies as legal blindness. This degree of
8 vision loss would be expected to greatly impair a
9 patient's independence and ability to perform
10 everyday tasks.

11 In addition to KVA events, patients in both
12 trials also experienced symptoms of ocular toxicity
13 that were captured by investigators and graded by
14 CTCAE; and although the patients in the control
15 arms also experienced some of these types of
16 toxicities, the rates of all-grade events and
17 grade 3 or 4 events in the belantamab
18 mafodotin-containing arms were substantially
19 higher. Similar trends were observed in DREAMM-8.

20 The patient-reported outcomes data from
21 these trials also provides important information
22 about the patient experience and additional details

1 about tolerability. The FDA's review focused on
2 results from the PRO-CTCAE, OSDI, and FACT-GP5.
3 The applicant also used a non-validated, two-item
4 questionnaire to assess reading and driving
5 ability; however, there was a high degree of
6 missing data for this questionnaire in DREAMM-7,
7 and FDA instead focused on the data from
8 well-established PRO measures with high completion
9 rates. These results showed that at each assessed
10 time point, a group of patients reported severe
11 visual side effects related to belantamab
12 mafodotin.

13 As I'll show on the following slide, there
14 was progressive worsening in symptoms from
15 baseline, which peaked around weeks 13 to 17, and
16 approximately 5 to 15 percent of respondents
17 reported severe visual symptoms at most assessed
18 time points. Overall, the PRO results demonstrate
19 the impact of the ocular toxicity on patients
20 receiving belantamab mafodotin and generally
21 support the clinician reported ocular toxicity
22 findings.

1 So here are some representative results from
2 DREAMM-7 for the PRO-CTCAE blurred vision item,
3 which asked patients, "In the last 7 days, what was
4 the severity of your blurry vision at its worst?"
5 There were high rates of blurred vision reported
6 that peaked between weeks 7 through 16, with over
7 50 percent of patients or respondents in the BVd
8 arm reporting at least moderate symptoms and over
9 20 percent of respondents reporting severe or very
10 severe symptoms at each of these time points.

11 In addition, although I'm not showing it
12 here, for the patients who reported any severity of
13 blurred vision other than none at that time point,
14 a branching question was asked. "In the last
15 7 days, how much did blurry vision interfere with
16 your usual or daily activities?" At the
17 time points between weeks 7 through 16, more than
18 50 percent of respondents in the BVd arm reported
19 that blurred vision interfered at least somewhat
20 with their usual or daily activities, and over
21 20 percent of respondents reported that blurred
22 vision interfered quite a bit or very much with

1 their usual or daily activities.

2 Here are some representative results from
3 DREAMM-8 for the OSDI. The OSDI is a 12-item
4 questionnaire that's designed to assess both
5 frequency of dry eye symptoms and their impact on
6 aspects of vision-related functioning such as
7 reading, driving at night, and using a computer.

8 The results from driving at night are shown
9 here, and at weeks 9 and 13, 34 percent of
10 respondents in the BPd arm reported limitations in
11 driving at night all of the time or most of the
12 time, and at each assessed time point,
13 approximately 10 to 20 percent of respondents
14 treated with belantamab mafodotin reported severe
15 limitations in driving at night.

16 Similarly, despite limitations with use of
17 the non-validated 2-item questionnaire, the
18 applicant noted that across both trials, 33 percent
19 of patients treated with belantamab mafodotin had
20 to stop driving at some point during treatment.

21 So that brings us to the summary of the
22 issue of high rates of ocular toxicity. Almost all

1 patients had KVA events, including high-grade and
2 recurrent events, and a substantial proportion of
3 patients had events that had not resolved as of the
4 data cutoff. There were high rates of dose
5 modifications in both trials, primarily due to KVA
6 events, and patients experienced prolonged and
7 recurrent treatment interruptions due to ocular
8 toxicity. There were also considerable impacts on
9 vision with clinically significant changes in best
10 corrected visual acuity in more than 60 percent of
11 patients in both trials and more severe changes to
12 20/100 or 20/200 in a subset of patients.

13 Considering that multiple myeloma is
14 primarily a disease of older adults with a median
15 age at diagnosis of 69, this degree of vision
16 impairment is likely to have a significant negative
17 impact, particularly in patients who live alone or
18 have other health conditions or functional
19 limitations.

20 Lastly, the patient-reported outcomes
21 results demonstrated a measurable impact of the
22 ocular toxicity on patients receiving treatment

1 with belantamab mafodotin, with the substantial
2 proportion of patients reporting blurred vision
3 that interfered with their usual or daily
4 activities and limitations in activities such as
5 driving at night, reading, and using a computer.

6 So I'll now move on to the uncertainty
7 regarding the proposed dosages, including the poor
8 tolerability and limited data to support dose
9 selection.

10 There was poor tolerability as evidenced by
11 the high rates of dose modifications in both
12 trials, the majority of which were due to KVA
13 events. These graphs show the percentage of
14 patients in each trial who received a given dose of
15 belantamab mafodotin in each cycle of treatment.
16 Purple represents the intended dose in each cycle,
17 blue and light blue represent dose modifications,
18 red represents dose interruptions, and gray
19 represents permanent discontinuation of study
20 treatment. By Cycle 3, more than 50 percent of
21 patients in both studies were not receiving the
22 intended dose, and the percentage of patients

1 remaining on the intended dose continued to
2 steadily decrease over time.

3 As discussed, there have been significant
4 challenges in the identification of an appropriate
5 dosage of belantamab mafodotin throughout its
6 development. At multiple time points, the FDA
7 provided feedback and expressed concerns regarding
8 the proposed dosages; however, the applicant chose
9 to proceed with the selected doses for DREAMM-7 and
10 DREAMM-8.

11 I'll now turn things over to Dr. Ankit Shah
12 to discuss some of the issues with dose selection
13 for DREAMM-7 and DREAMM-8 in more detail.

14 **FDA Presentation - Ankit Shah**

15 DR. SHAH: Thank you, Dr. Baines.

16 Good morning. My name is Ankit Shah, and
17 I'm a clinical pharmacology team lead here at the
18 FDA. As Dr. Baines just highlighted, the
19 optimization of the belantamab mafodotin dosage has
20 remained a key issue throughout its development
21 program. In the next few slides, I will discuss
22 the issues with the dose exploration study

1 supporting the dosage selection for the respective
2 combination regimens in DREAMM-7 and DREAMM-8. I
3 will also discuss the results from the dosage
4 optimization PMR study, DREAMM-14, for the
5 monotherapy.

6 The dose exploration in DREAMM-6 Arm B was
7 used to support the dosage selection for Bvd
8 combination in the DREAMM-7 trial. This was a
9 non-randomized, open-label study with a small
10 number of patients in each dosage cohort that
11 included three dose levels, 1.9, 2.5, and
12 3.4 mg/kg, given either once every 3 weeks or once
13 every 6-week dosing intervals. In general, the
14 overall response rates were comparable across dose
15 levels that were evaluated.

16 With respect to the safety and tolerability,
17 fewer grade 2 or worse corneal events were noted,
18 and dose modifications were also fewer in the
19 1.9 mg/kg dose cohort, which were administered once
20 every 3 weeks as outlined in the red box.

21 When looking at the effect of the dosing
22 intervals, as shown in the blue box, the patients

1 treated with once every 6-week schedule experienced
2 fewer grade 2 or worse corneal adverse events.
3 Similarly, fewer dose modifications due to corneal
4 adverse events were reported in the 1.9 mg/kg once
5 every 6-week compared to the patients in the once
6 every 3-week dosing cohort. These data suggest
7 that a lower dose with longer dosing interval may
8 improve the safety while maintaining the response
9 rates; however, due to the small number of patients
10 in each dosage cohorts, there are some
11 uncertainties.

12 Given these limitations, the FDA expressed
13 concerns with the proposed 2.5 mg/kg once every
14 3-week dosage and recommended that more patients
15 should be assessed at the lower dosages and in the
16 combination therapy before the final dose selection
17 to support the DREAMM-7 trial. Despite these
18 concerns, the applicant selected the 2.5 mg/kg once
19 every 3-week dosage regimen for the DREAMM-7 trial.

20 The dose exploration data from the ALGONQUIN
21 study was used to support the BPd combination
22 regimen in the DREAMM-8 trial. This was a

1 non-randomized study that evaluated 1.9, 2.5, and
2 3.4 mg/kg dose levels in every 4, every 8, or every
3 12-week schedules in a small number of patients in
4 each cohort. Of note, only 5 patients were
5 evaluated at the proposed DREAMM-8 dosage regimen.

6 The data from ALGONQUIN also showed
7 comparable overall response rates across all those
8 levels and dosing schedules. Although there were
9 fewer missed doses and higher relative dose
10 intensity in the 1.9 mg/kg given with longer dosing
11 intervals, this data is, again, difficult to
12 interpret given the small number of patients in
13 each cohort.

14 At the end of the phase 2 meeting, prior to
15 initiation of the DREAMM-8 trial, FDA did not agree
16 with the applicant's proposed starting dose of
17 2.5 mg/kg and recommended evaluating more patients
18 at the lower dose levels. Once again, the
19 applicant decided to move forward with the
20 2.5 mg/kg starting dose followed by 1.9 mg/kg once
21 every 4-week regimen in the DREAMM-8 trial.

22 Turning to DREAMM-14, this study was

1 conducted to fulfill PMR from the original
2 accelerated approval for belantamab mafodotin
3 monotherapy to characterize the safety and efficacy
4 of lower doses and/or alternative dosing regimens.
5 DREAMM-14 was a randomized, open-label trial that
6 evaluated 1.9 and 2.5 mg/kg dose levels in once
7 every 3-week or once every 6-week intervals in a
8 larger number of patients, approximately 40 per
9 arm, compared to the previous dose exploration
10 studies.

11 These dose modification plots, as you can
12 see on the slide, show the percentage of patients
13 at a given dose in each cycle. Data from 1.9 mg/kg
14 dose cohorts is shown on the left and the data from
15 2.5 mg/kg is shown on the right. The bottom
16 figures show the data from longer dosing intervals
17 within same dose levels.

18 When you compare the different dose levels,
19 that is from left to right, more patients on the
20 lower 1.9 mg/kg dose were able to remain on the
21 intended dose compared to the 2.5 mg/kg dose level.
22 Similarly, when you compare from top to bottom,

1 that is from Q3 to Q6 week dosage regimen, longer
2 dosing interval cohorts were able to remain on
3 their intended dosage for a longer period of time
4 compared to the patients in the once every 3-week
5 dosage regimen.

6 Consistently, in the previously noted trends
7 in DREAMM-6 and ALGONQUIN, there were fewer grade 2
8 or higher corneal adverse events and adverse events
9 leading to dose modifications at the 1.9 mg/kg dose
10 level with the longer dosing interval. The
11 efficacy from this trial showed comparable response
12 rates with overlapping confidence intervals across
13 all dose levels and dosing intervals. The bottom
14 row of the table shows exposure metrics, especially
15 Cmax and Coverage, over 42 days associated with
16 different dosage intervals.

17 Notably, no change in the efficacy was
18 observed in the cohorts with lower belantamab
19 mafodotin exposure. On the other hand, fewer
20 grade 2 or higher KVA events and dose interruptions
21 were reported with the lower belantamab mafodotin
22 exposure arms, suggesting that the lower dosage or

1 longer interval may better balance the benefit-risk
2 profile.

3 As highlighted by Dr. Telaraja in her
4 presentation, identification of an optimized dosage
5 is an important aspect of balancing the
6 benefit-risk profile. The applicant conducted very
7 limited dose exploration in a small number of
8 patients to support selection of the belantamab
9 mafodotin dosages in DREAMM-7 and DREAMM-8.

10 The available data also suggest that lower
11 exposure of belantamab mafodotin may result in
12 fewer dose modifications and corneal adverse events
13 without necessarily affecting the efficacy.

14 Overall, while the efficacy was observed, the
15 safety and tolerability data suggest that the
16 DREAMM-7 and DREAMM-8 dosages may not be adequately
17 optimized.

18 Additionally, available data from multiple
19 supporting studies suggest that the lower dose,
20 longer dosing intervals, or a combination of these
21 two approaches may result in fewer adverse events
22 with similar efficacy and a more favorable benefit-

1 risk profile.

2 Now, I will turn it back to Dr. Baines.

3 **FDA Presentation - Andrea Baines**

4 DR. BAINES: Thanks, Dr. Shah.

5 I'll now summarize the key benefit-risk
6 considerations. Although several apply to both
7 DREAMM-7 and DREAMM-8, there are a few notable
8 differences, so I'll go through the considerations
9 for each study separately.

10 For DREAMM-7, in terms of benefit, the
11 DREAMM-7 trial met the primary efficacy endpoint of
12 PFS. It also showed a statistically significant
13 improvement in OS. However, while OS is an
14 important endpoint that serves as a metric of both
15 safety and efficacy, the clinical relevance of the
16 observed treatment effect in comparison to the Dvd
17 comparator arm and applicability to the current
18 U.S. population are unclear.

19 In terms of risk, as we discussed, the
20 ocular toxicity associated with belantamab
21 mafodotin is a unique risk to this product that is
22 not seen with other currently available therapies

1 for multiple myeloma. The high rates of ocular
2 toxicity and poor tolerability, combined with the
3 limited dose exploration and additional data
4 suggesting improved tolerability with lower doses
5 and longer dosing intervals, raise uncertainty
6 regarding the appropriateness of the proposed
7 dosage, which is the same as the prior monotherapy
8 dosage.

9 As discussed by Dr. Telaraja, identification
10 of a safe and effective dose prior to approval is
11 critically important given the considerable
12 challenges with conducting post-approval dose
13 optimization studies. Furthermore, the
14 benefit-risk must be considered in the context of
15 the current treatment landscape for patients with
16 relapsed or refractory multiple myeloma. There are
17 multiple approved regimens for this population,
18 including those with demonstrated OS benefit and
19 established safety profiles.

20 While DREAMM-8 also met its primary efficacy
21 endpoint of PFS, DREAMM-8 did not meet statistical
22 significance for OS. Additionally, the trial is

1 not adequately powered for OS and may not
2 demonstrate a statistical significance for OS. The
3 same concerns regarding the ocular toxicity,
4 uncertainty regarding the proposed dosage, and the
5 challenges with post-approval dose optimization
6 also apply to DREAMM-8. The clinical relevance of
7 the treatment effect in comparison to the Pd
8 comparator arm and the applicability of the results
9 to the U.S. patient population are also a concern.

10 Overall, considering the totality of data,
11 the benefit-risk of belantamab mafodotin remains
12 uncertain in patients with relapsed or refractory
13 multiple myeloma who have received at least one
14 prior line of therapy.

15 We would like the committee to discuss
16 whether appropriate dosages of belantamab mafodotin
17 have been identified for the proposed patient
18 population of patients with relapsed or refractory
19 multiple myeloma in the context of the observed
20 ocular toxicity, tolerability of the regimens, and
21 the efficacy results from DREAMM-7 and DREAMM-8.
22 And to clarify, by dosage, we mean both the dose

1 and the schedule of belantamab mafodotin. As a
2 reminder, the proposed indication that is being
3 sought is in patients with multiple myeloma who
4 have received one prior line of therapy.

5 After the discussion, we'll ask the
6 committee to vote on the following questions
7 separately for each proposed indication. Is the
8 overall benefit-risk of belantamab mafodotin in
9 combination with bortezomib and dexamethasone
10 favorable at the proposed dosage in the proposed
11 patient population? Is the overall benefit-risk of
12 belantamab mafodotin in combination with
13 pomalidomide and dexamethasone favorable at the
14 proposed dosage in the proposed patient population?

15 Thank you very much for your attention.
16 This concludes my presentation.

17 **Clarifying Questions**

18 DR. VASAN: We will now take clarifying
19 questions for the presenters. When acknowledged,
20 please remember to state your name, for the record
21 before you speak and direct your question to a
22 specific presenter, if you can. If you wish for a

1 specific slide to be displayed, please let us know
2 the slide number, if possible. Finally, it would
3 be helpful to acknowledge the end of your question
4 with a thank you and end of your follow-up question
5 with, "That is all for my questions," so we can
6 move on to the next panel member.

7 Are there any clarifying questions for the
8 presenter? I'll start out with the first question.

9 This is a question for GSK. Can you show us
10 Kaplan-Meier curves for progression-free survival
11 and overall survival for both DREAMM-7 and DREAMM-8
12 stratified by dose intensity?

13 DR. ABDULLAH: Stratified by dose --

14 DR. VASAN: Dose intensity.

15 DR. ABDULLAH: -- intensity.

16 DR. VASAN: You've shown overall response
17 rates. You've shown some simulations. What I'm
18 asking for is from the phase 3 trials, can you show
19 us what that data are?

20 DR. ABDULLAH: Yes. We can certainly show
21 you at least Kaplan-Meier curves for PFS based on
22 Cycle 1 exposure. That is available.

1 DR. VASAN: This question is for overall
2 exposure. I understand you started out 2.5; you
3 went down to 1.9. This is the mathematical
4 quantification of the overall dose intensity.

5 DR. ABDULLAH: Yes. I think we can
6 certainly look into whether or not we can provide
7 that after the break and get back to you, but I
8 don't believe we have that available right now.

9 DR. VASAN: Okay.

10 Is the FDA able to comment on this?

11 DR. KANAPURU: Bindu Kanapuru, FDA. I don't
12 believe we have the Kaplan-Meier curves, but we do
13 have details on the median dose intensity for the
14 regimens in the DREAMM-7 and DREAMM-8 trials, if
15 you're interested in that.

16 DR. VASAN: Thank you.

17 DR. ABDULLAH: And we can certainly share
18 that with you, the dose intensity data, the dose
19 intensity and the relative dose intensity as well,
20 too.

21 DR. VASAN: Okay. If we could show that,
22 please.

1 DR. ABDULLAH: Please bring up the slide
2 with the dose intensity and relative dose intensity
3 for DREAMM-7 and 8, please. Slide ED-6 up, please.
4 Thank you.

5 I think probably what you'll see on this
6 slide, as represented for both DREAMM-7 and
7 DREAMM-8, is we do see that higher exposure during
8 the first 6 months of treatment is certainly
9 important to help drive the disease burden down and
10 induce what is the depth of response that we've
11 seen across both DREAMM-7 and DREAMM-8. At least
12 based on the exposure-response curves and
13 exposure-response analyses we've conducted for
14 Cycle 1 exposures, we've seen a more steep
15 exposure-response curve relative to safety.

16 What you see represented on this slide, of
17 course, at the top half is the dose intensity
18 during the first 6 months which, again,
19 demonstrates a higher exposure in both DREAMM-7 and
20 DREAMM-8. And then, of course, in terms of the
21 relative dose intensity, we see that approximately
22 80 percent of doses were administered at the

1 protocol-specified dose and schedule across both
2 studies as well, too.

3 With the implementation of the dose
4 modification guidelines, after that initial
5 induction period, what we do see is the dose
6 intensity comes down, and then, of course, the dose
7 modifications are taking effect, and then the same
8 holds true for the relative dose intensity as well.

9 DR. VASAN: FDA, please?

10 DR. KANAPURU: Yes. I would like to ask our
11 clinical pharmacology colleague to comment on the
12 dose intensity. Thanks.

13 DR. SHAH: Hi. Ankit Shah, clinical
14 pharmacology from FDA. In order to understand the
15 the dose intensity, we also have to look at the
16 dose intensity plots; so can you please pull slide
17 number 41 from the FDA presentation? Thank you.

18 As you can see in these plots, a majority of
19 the patients after Cycle 2 and Cycle 3 actually did
20 not even receive the starting dose that was
21 intended for this patient population. And then in
22 terms of the exposure-response analyses that is

1 presented by the sponsor, I would like to invite my
2 colleague here at the FDA.

3 DR. LI: Hi. Yangbing Li, pharmocometrics
4 reviewer at the U.S. FDA. Yes. In the
5 exposure-response analysis that's for safety, we
6 see the KVA events, especially for the grade 2 or
7 worse KVA events, increase sharply with the
8 exposure of the ADC at first cycle, while for the
9 exposure-response for efficacy, the results are not
10 very consistent with the dose response across
11 different studies.

12 We also have some concerns about the current
13 exposure-response analysis, as most of the patients
14 received just one dose level, and also that the
15 majority of patients have dose reductions beyond
16 first cycle, which may not be included in the
17 current model to be evaluated due to only the first
18 cycle exposure was evaluated. So based on this, we
19 may suggest that further study on the lower dose or
20 longer dose interval will be needed in future
21 studies.

22 DR. ABDULLAH: Dr. Vasan, if I may just

1 share some additional data that might be of
2 relevance as well, too.

3 DR. VASAN: Alright.

4 DR. ABDULLAH: Thank you.

5 If I can call up slide ED-10, please. What
6 you'll see on this slide, actually -- and this is
7 for DREAMM-7 -- it's actually looking at the dose
8 level and time between doses. Just as an example,
9 for DREAMM-7, to give you some context,
10 specifically, this is the number of doses, or
11 percentage of doses, whether it be 2.5 or 1.9, that
12 were administered at any time point that patients
13 were on treatment. And as expected, we see that
14 during that initial period of treatment, there are
15 about maybe 41 percent of patients that received
16 the 2.5 milligram per kilogram dose.

17 Subsequently, of course, as with the
18 prespecified dose modification guidelines, patients
19 were dose reduced, so about 59 percent of them went
20 on to 1.9. Now again, within the context of
21 DREAMM-7, we know that approximately
22 75 to 80 percent of patients ended up being dose

1 reduced to 1.9; however, what's probably most
2 important to consider here is what's on the
3 right-hand side of the slide. So about maybe
4 61 percent of doses were actually administered
5 within the prespecified 3-week interval while on
6 study, and then an additional 18 percent were
7 administered between 3 and 9 weeks as well.

8 DR. VASAN: Thank you. That's all for my
9 questions.

10 Dr. Nowakowski?

11 DR. NOWAKOWSKI: Thank you. Greg
12 Nowakowski, and a question to the sponsor. Before
13 we dive more into safety analysis, I would like to
14 understand the context of efficacy to the U.S.
15 population. For whatever reason, the study was not
16 accruing well in the U.S. This can happen due to
17 suboptimal control arm or inclusion criteria of the
18 study and availability of other therapies as well.

19 So to better understand that, do you know
20 what are the characteristics of the U.S. population
21 versus the rest of the population included in this
22 study, particularly in regards to lines of therapy?

1 What were the lines of therapy in patients ex-U.S.
2 and U.S., and other characteristics?

3 DR. ABDULLAH: I'd like to call on
4 Dr. Mukhopadhyay to provide some additional context
5 around the characteristics of the U.S. population.

6 DR. MUKHOPADHYAY: Pralay Mukhopadhyay, GSK
7 oncology. Within the context of the DREAMM-7 and
8 DREAMM-8 studies, there were fewer U.S. patients
9 enrolled, and specifically, we haven't looked into
10 the characteristics because of the number of events
11 that were available for the studies. But I think
12 what's relevant is, the majority of the study,
13 two-thirds of the patients were enrolled in Europe,
14 10 to 15 percent of the patients were enrolled in
15 Australia or New Zealand.

16 It's important to note that the
17 demographics, the disease characteristics, clinical
18 outcomes, as well as available treatments in these
19 regions, are very much also reflective of the
20 clinical practice within the United States as well.
21 So for both studies, the data that has been
22 generated we believe is representative within the

1 U.S. Thank you.

2 DR. NOWAKOWSKI: Well, thank you. I
3 understand the --

4 DR. VASAN: I'm sorry to interrupt.

5 FDA?

6 DR. KANAPURU: The FDA would like to
7 comment.

8 DR. TELARAJA: Hi. This is Deepti Telaraja,
9 FDA. I would just like to reiterate that this is a
10 very important point and a significant
11 consideration in FDA's benefit-risk considerations.

12 As Dr. Baines pointed out in the FDA
13 presentation, there were several factors that
14 contribute to potential limited applicability to
15 current U.S. patients, one being age. There was
16 limited enrollment of older adults, and the second
17 being race, with limited enrollment of African
18 American patients. As described, and as you know,
19 there is a higher prevalence of multiple myeloma in
20 African American patients, and these patients were
21 underrepresented in this clinical trial.

22 Finally, with regard to the control arms and

1 their usage in the second-line and beyond setting
2 for current U.S. patients, we feel that all of
3 these factors may have impacted U.S. enrollment and
4 ultimately may impact relevance to current
5 patients. Thank you.

6 DR. ABDULLAH: What we would probably just
7 also highlight as well, too, is we've treated
8 approximately 300 U.S. patients across our broader
9 development program and exposed approximately 4,000
10 U.S. patients, whether it be across the development
11 program, investigator-sponsored studies, expanded
12 access, or the prior approval as well, too, so just
13 to provide some context.

14 In terms of the representation of the
15 elderly population in the study as well, I'd like
16 to call up CO-27, please. And again, just based on
17 the data that we've observed across a number of
18 different prespecified subgroups, we see a
19 consistent treatment effect across both DREAMM-7
20 and 8 for progression-free survival, even in the
21 elderly population as well.

22 In addition, what we've also looked at is

1 African American representation across our
2 development program, and while we acknowledge that
3 we didn't necessarily or were not able to recruit
4 African American patients in the U.S., in DREAMM-7
5 and 8, we actually did treat a number of different
6 African American patients across our broader
7 development program. We conducted population PK
8 analyses to look at whether or not race or
9 ethnicity was a key covariate, and then
10 subsequently, exposure-response analyses as well,
11 too, and they did not show that race or ethnicity
12 was a key covariate-predicting response to
13 belantamab therapy.

14 We did treat about 70 African American
15 patients across our broader development program,
16 and we do have data, if I can bring up, please,
17 slide DM-8. We actually do have data from a
18 late-line study. It was a single-arm study that
19 supported the initial approval in the U.S., which
20 was the DREAMM-2 study, and it was in a
21 triple-class refractory multiple myeloma patient
22 population. And again, what we see here is the

1 response rate across both African American patients
2 or Caucasian patients is very consistent.

3 I'd actually like to call on Dr. Craig Cole
4 to provide his perspective as well, too, in terms
5 of how he's seen the treatment effect for Blenrep
6 across patients of different ethnicities.

7 DR. COLE: Craig Cole from Karmanos Cancer
8 Institute, Michigan State University. One point is
9 that when you look across BCMA-related therapies,
10 in general, regarding race, looking at bispecific
11 CAR T, there's been no difference in efficacy and
12 not much difference in the way of toxicity.

13 The other thing is, I really want to make
14 clear that my love, my passion, is health equity in
15 myeloma. We know that black patients have been
16 underrepresented in myeloma trials for years.
17 Black patients and brown patients have not had
18 access to transplant for 20 years, have very poor
19 access to CAR T therapies, and have very poor
20 access to other BCMA therapies. This is the
21 opportunity to level the playing field for multiple
22 myeloma regarding those therapies because my little

1 black lady in Detroit is not going to get CAR T
2 because she's too scared of it. My patients in
3 Lansing that are farmers are not going to get CAR T
4 and second line because they don't have access to
5 it.

6 This BCMA therapy has the opportunity to
7 treat those patients with equal efficacy and the
8 ability to see their own eye doctors in order to
9 mitigate the toxicity. Thank you.

10 DR. ABDULLAH: Thank you.

11 DR. NOWAKOWSKI: Well, thank you. I
12 understand those responses, but I'm less concerned
13 about biological differences. I'm more concerned
14 about the difference, the geographical differences,
15 based on the ability of therapies across
16 geographical regions at the time that the study was
17 conducted. So I know the population is small, but
18 you surely must have some analyses comparing the
19 U.S. population characteristics with the rest of
20 the population of the study and some efficacy
21 endpoints.

22 DR. ABDULLAH: Yes. We've actually looked

1 at this in DREAMM-7, as an example, as well, too,
2 and specifically to your point, to look at
3 treatment effect and whether or not there are any
4 differences. And I'd like to actually bring up
5 slide SP-28, please.

6 Again, as you probably see, of course, the
7 limited number of patients recruited in North
8 America doesn't necessarily certainly enable us to
9 conduct a meaningful analysis. But again, as we've
10 looked at the study recruiting two-thirds of
11 patients in Europe -- and another 10 to 15 percent
12 in Australia and New Zealand, where we know the
13 medical practice but also the disease demographics
14 are very consistent with what the U.S. population
15 would look like -- we see, certainly, the treatment
16 effect that's been observed.

17 I'd actually like to call on Dr. Sagar
18 Lonial to provide his clinical perspective on the
19 relevance of the data, especially recruited in
20 these regions, to a U.S. population.

21 DR. VASAN: I'm sorry. We're bringing up
22 multiple points here.

1 Would the FDA like to comment on the
2 previous comment?

3 DR. KANAPURU: Yes. This is Bindu Kanapuru
4 from the FDA. We appreciate what the applicant is
5 saying, but we are here today to discuss the
6 benefit-risk of these two proposed combinations in
7 first-line relapsed/refractory multiple myeloma,
8 and what we are seeing here is that we don't have
9 data, adequate data, in the U.S. patient
10 population, including those who are older than
11 75 years, and I think that's a significant
12 limitation.

13 DR. PAZDUR: This is for GSK. Over the past
14 five years, we've been on record at the FDA really
15 emphasizing enrollment of a U.S. population for
16 generalizability to the U.S. population, and U.S.
17 practice. That's a different issue than just the
18 U.S. population.

19 You obviously, during the course of a study,
20 are looking at where the enrollment is coming from.
21 What did you do during the conduct of this study to
22 increase U.S. enrollment here? Because this is

1 somewhat disappointing that after all of the
2 conversations that we've had over the past five
3 years with the community, that we're seeing less
4 than 5 percent enrollment here. So what did GSK do
5 during the enrollment of this study to increase
6 U.S. participation in the trial?

7 DR. ABDULLAH: We actually did a number of
8 different things.

9 DR. PAZDUR: Were you soliciting?

10 DR. ABDULLAH: Yes, please.

11 First of all, we actually initiated the
12 study at 14 sites, DREAMM-7 but also DREAMM-8,
13 across the U.S. Second, we engaged with patient
14 advocacy groups to make sure that we raise
15 awareness around these clinical trials being
16 ongoing as well, too. And then third, we actually
17 did feasibility across more than 200 sites in the
18 U.S., across each respective study, to try to help
19 encourage recruitment.

20 Now, what's probably important to highlight
21 here is that as we look at published literature on
22 recruitment of multiple myeloma studies in the U.S.

1 as well, too, we've seen typically that they've
2 ranged anywhere between 8 to 12 percent in terms of
3 U.S. patients being recruited and about maybe
4 4 percent of African American patients being
5 recruited in the U.S. as well, too. So this is
6 something that I think the entire field is
7 continuing to try to improve on but, yet, at the
8 same time --

9 DR. PAZDUR: Let me just interrupt you. You
10 went through all of these efforts. Why didn't you
11 get more enrollment, then?

12 DR. ABDULLAH: I think, certainly, there are
13 a number of ongoing --

14 DR. PAZDUR: Was it the control arm, was
15 inadequate?

16 DR. ABDULLAH: There are certainly a number
17 of key, probably, elements that relate to
18 competitive clinical trials that are ongoing across
19 the U.S. as well, too. I think if we look at also
20 some of the precedence around some of the recent
21 studies that have supported approval in multiple
22 myeloma, including in newly diagnosed patients, we

1 see less than 5 percent of patients who are
2 actually recruited in the U.S. as well, too.

3 So it's not necessarily any different than
4 what we've recently seen in multiple myeloma
5 studies that have recently supported regulatory
6 approval by the FDA.

7 DR. PAZDUR: And let's go to this issue of
8 generalizability to the U.S. practice, which is
9 different than what goes on in Western Europe and
10 Australia, because we have a unique U.S. practice
11 here.

12 Since you only have 5 percent of the
13 patients in a large randomized trial -- and a large
14 randomized trial is supposed to represent what kind
15 of goes on in the real world as best as we could do
16 in the context of a trial; it's not the phase 1
17 study, so to speak. So we're dealing with a unique
18 toxicity here.

19 How is that toxicity really going to be
20 managed? And do we have confidence with this
21 ophthalmological toxicity that this is going to be
22 manageable in the U.S. population here, given only

1 5 percent of the population in this trial, with
2 this individual population? How do we get that
3 confidence with so low numbers being enrolled in
4 this trial?

5 DR. ABDULLAH: I think that's certainly an
6 important topic, and it's one of the reasons why
7 we've tried to really characterize what this ocular
8 toxicity is.

9 First, we develop this KVA scale in
10 collaboration with the FDA to make sure --

11 DR. PAZDUR: Yes, but let's take a look at
12 the practicality. You guys are practicing doctors.
13 How easy is it to get an ophthalmological consult
14 like that? It's going to be very hard to do. So
15 how are you going to really manage this?

16 DR. ABDULLAH: As I've mentioned and alluded
17 to previously, we've actually had 4,000 patients
18 exposed in the U.S. to Blenrep previously --

19 DR. PAZDUR: Yes, but many of those were at
20 tertiary medical centers, right?

21 DR. ABDULLAH: We actually have a number of
22 different, I would say, elements that we're

1 actually incorporating into our risk mitigation
2 strategy. Those include education of eyecare
3 professionals, treating hematologists/oncologists,
4 the patients as well, too, but also establishing
5 across different parts of the U.S. infrastructure
6 for eyecare professionals to be connected to
7 hematologists/oncologists as well, too.

8 I'd certainly like to call on Dr. Cole to
9 share his experience, as a practicing community
10 physician, of how that has worked currently or in
11 the past as well, too.

12 DR. PAZDUR: I think our time is limited, so
13 we could forego that.

14 DR. VASAN: We have several questions.

15 Next, I'll call Dr. Gradishar.

16 DR. GRADISHAR: Thank you. Bill Gradishar,
17 Northwestern, and a follow-up on two issues related
18 to toxicity, and Dr. Pazdur just touched on one of
19 them, and one question to Dr. Afshari and the other
20 to Dr. Rasheed. Dr. Pazdur was touching on the
21 availability of ophthalmologic assessment, and
22 since this, if approved, would be in the community,

1 how equipped do you think the average
2 ophthalmologist is to deal with this as opposed to
3 a corneal specialist?

4 The second question is to Dr. Rasheed to try
5 and get some more granular understanding of reading
6 ability and driving, two very commonly done things
7 by people. How much of a dissatisfier was this in
8 your quality-of-life instruments, if you were able
9 to glean that? Because it seemed to have happened,
10 perhaps repetitively, with subsequent cycles of
11 therapy, and I'm just wondering how much of a
12 dissatisfier this was to patients. It's clearly a
13 quality-of-life consideration.

14 Thank you. Those are my questions.

15 DR. AFSHARI: Thank you. Natalie Afshari
16 from the University of California, San Diego. I
17 practice at a university setting, so we have a
18 cancer institute, and I do see patients from a
19 cancer institute. But I also see many patients
20 from outside that are referred in.

21 You know, everybody wants to help cancer
22 patients, and in the eye world, we don't see cancer

1 patients every day. So when there is a cancer
2 patient, we fit them right away, and we make sure
3 we communicate with the oncologist, whether that is
4 through the electronic health record, or a phone
5 call or phone call messages, any which way. There
6 is also precedence with this. There are other
7 medications, whether that's rheumatology or
8 anything that has eye side effects, and we do
9 communicate with the physicians.

10 Also, we deal with other ADCs that are in
11 the market; not in multiple myeloma but in
12 ophthalmology, we are seeing them, and we are
13 communicating with the physicians. So basically,
14 these patients get in as they need, and we do
15 follow them. Thank you.

16 DR. VASAN: Thank you.

17 Dr. Spratt?

18 DR. GRADISHAR: But are you speaking for the
19 community as a whole, the ophthalmology community,
20 or your own personal practice as an academic
21 subspecialist?

22 DR. AFSHARI: Thank you, Dr. Gradishar.

1 Both. At every major eye meeting, there is a talk
2 about these new ADCs, what we find, the little
3 microcysts in the cornea, because this is the way
4 of the future, and we all, as ophthalmologists and
5 optometrists, are seeing these patients. So I'm
6 speaking for both; that we are aware of it, and we
7 see these patients as they need to.

8 And to be honest, as ophthalmologists, we
9 are a little less worried about the microcysts of
10 the cornea as our oncology colleagues are because
11 corneal epithelium just comes from periphery, and
12 within a few days fills in the center. And once
13 the drug is held, or before the next dose of drugs,
14 the patient has much better vision. Both the
15 patient and us, we know that their vision dips down
16 and then comes back up, so we are much less
17 worried. And the patients, once they've gone
18 through some cycles, are less worried about their
19 vision, in general. Thank you.

20 DR. VASAN: Could the FDA please comment?

21 DR. GORMLEY: Yes. This is Nicole Gormley,
22 FDA. Thank you for the question, Dr. Gradishar. I

1 think it's really important, particularly the
2 second portion of your question where you asked the
3 question how this relates specifically to the
4 patient-reported outcomes.

5 While it's important to understand how this
6 will be implemented in the clinical practice and in
7 the community more broadly, I just want to
8 wholeheartedly acknowledge that this will be a
9 challenge, for prescribers, and oncologists, and
10 ophthalmologists, and patients. It requires very
11 close collaborations, and there is a REMS, but this
12 is a challenge with this product.

13 I'd like to specifically ask Dr. Bhatnagar
14 to come up and share a little bit more information
15 regarding the patient-reported outcomes because
16 while it is important to understand what the
17 clinicians reported and what the clinician findings
18 were, it is really important to understand from the
19 data the patient-reported outcomes, how this
20 impacted their functioning and the impact.

21 DR. BHATNAGAR: Sure. I'm happy to do so.
22 My name is Vishal Bhatnagar. I'm Associate

1 Director for Patient Outcomes in the Oncology
2 Center. I'm also an oncologist and hematologist
3 with a specific focus in multiple myeloma.

4 So, we reviewed the patient-reported
5 outcomes data, and I won't rehash what Dr. Baines
6 presented in her presentation, but what we saw was
7 a sustained and a clear signal of serious
8 limitation and ability to perform vision-related
9 functioning, so driving and reading. And although
10 I can recognize what was just said about what the
11 interplay is between practicing ophthalmologists
12 and hematologists, it's patients who are the ones
13 that are dealing with these significant side
14 effects, and limitations, and ability to conduct
15 their ADLs.

16 So I just wanted to bring that out, and it
17 was a very clear signal that was presented by
18 Dr. Baines, but not so much in the applicant's
19 presentation.

20 DR. ABDULLAH: Dr. Vasan, if I may just --

21 DR. VASAN: Sorry. In the interest of time,
22 I think we need to move on.

1 Dr. Spratt?

2 DR. SPRATT: This is Dan Spratt, UH Seidman.

3 I had put my hand down. It was related to just why
4 there's so few U.S. patients enrolled, and that
5 was, I think, thoroughly addressed. Thank you.

6 DR. VASAN: Thank you.

7 Dr. Madan?

8 DR. MADAN: Yes. Ravi Madan, National
9 Cancer Institute. Sorry if you showed this. From
10 the DREAMM-7 trial, do you have the data on,
11 basically, the subsequent therapies for the
12 patients that were treated? And if somebody could
13 comment maybe from both sides in terms of how
14 applicable that is to the U.S. practice.

15 DR. ABDULLAH: Thank you very much,
16 Dr. Madan. We do actually have the data from the
17 DREAMM-7 study, if I may bring up slide EF-12. I
18 think just some context to provide here, first, of
19 course, these studies actually started in 2021.
20 The trial started in 2021, and then, of course,
21 subsequently read out at the end of 2023, DREAMM-7
22 specifically as well, too.

1 What we saw in terms of subsequent therapies
2 that patients may have received, they may have
3 received either a proteasome inhibitor, other
4 immunomodulatory agents, and then, of course to a
5 lesser extent, certainly BCMA-directed therapies
6 that may have included T-cell engagers as well,
7 too.

8 DR. GORMLEY: The FDA, our comments, we did
9 not perform analyses based on U.S. patients versus
10 others because there were just too few U.S.
11 patients to really have a meaningful
12 interpretation.

13 DR. MADAN: Just to follow up, though, can
14 anyone inform how representative these subsequent
15 therapies are to the current U.S. standards, or at
16 least the standards contemporary with this trial?

17 DR. KANAPURU: This is Bindu Kanapuru, FDA.
18 Can we have this slide up please, again?

19 I just wanted to highlight, as was pointed
20 out both in the FDA introductory presentation and
21 the main presentation, current standard of care for
22 newly diagnosed patients is quadruplet or triplet

1 regimens that include an anti-CD38. And if you had
2 seen the slide in the Bvd regimen, the subsequent
3 therapy, the most common was a CD38, anti-CD38,
4 which patients would have already received in the
5 current treatment landscape. So, certainly,
6 they're not reflective of what would happen
7 currently in the U.S.

8 DR. VASAN: Is that all, Dr. Madan?

9 DR. MADAN: Yes. Thank you.

10 DR. VASAN: Thank you.

11 Dr. Beringer?

12 DR. BERINGER: Paul Beringer, USC. I had a
13 couple of questions about the the dose-response
14 relationships, and in particular, slide 22, which
15 was used as an argument for going with a higher
16 dose initially, and then dose adjustment down later
17 on. These exposure-response curves are based on
18 DREAMM-6 through 8, which was a relatively narrow
19 range of dosing. DREAMM-14 had more dosing
20 regimens that were included, and there's only a
21 separate exposure-response curve for that one.

22 Do you have data that incorporates all four

1 trials, and the curves, are they the same?

2 DR. ABDULLAH: Yes. We've actually looked
3 at this across what is extensive PK modeling that
4 we've conducted, and I'd like to call on Dr. Melhem
5 to provide some additional context around this.

6 DR. MELHEM: Murad Melhem, GSK, clinical
7 pharmacology modeling simulation. To answer
8 directly the question, we did pull the data from
9 DREAMM-6, 7, and 8 for the analysis that you've
10 seen. DREAMM-14, just because it happened in
11 different types and stage of patients, it was done
12 actually separately.

13 The trend actually that you saw in the
14 separation and the safety and efficacy was
15 conserved across all. So when we did DREAMM-6
16 alone, DREAMM-14 alone, this was the same
17 conclusion as that pooled analysis, but we didn't
18 pool DREAMM-14 with the rest of them.

19 DR. BINGER: Okay. Because looking at the
20 DREAMM-14 exposure-response curves, the curves are
21 both shifted to the right, and there's overlap
22 between the efficacy and safety curves at the

1 concentrations that are expected with the
2 recommended dosing.

3 DR. MELHEM: And that was actually a
4 different line of therapy, like I said. And what
5 you see and the differences, exposure-response
6 actually conveys the same conclusion, but the
7 relationship, a grade 3 and 4, is a little
8 different. However, the bilateral BCVA worsening,
9 which we think also is clinically relevant, is
10 conserved.

11 DR. ABDULLAH: I think what's probably
12 important to highlight as well, too, is when we've
13 looked at the efficacy data more specifically from
14 DREAMM-14, we do see that, again, the higher
15 starting dose, the more frequent dosing intervals,
16 are associated with a greater depth of response but
17 also improved PFS, as outlined on CO-20. So we do
18 see that the data in terms of the exposure-response
19 relationships actually do hold out, whether it be
20 across DREAMM-14, the ALGONQUIN study, or the
21 DREAMM-6 trial.

22 DR. BERNINGER: Okay. And on slide 23, you

1 did these dose simulations looking at
2 progression-free survival with these doses, which
3 include ones with longer intervals. This does not
4 include dose reductions due to adverse effects;
5 correct?

6 DR. ABDULLAH: It actually incorporates the
7 dose modifications as well, too.

8 DR. BERINGER: Okay. So this would
9 represent data as if they had ocular events and had
10 dose reductions.

11 DR. ABDULLAH: That is correct. What you do
12 see is there is a meaningful loss in efficacy,
13 again, if you lower the starting dose or prolong
14 the dosing intervals.

15 DR. VASAN: Would FDA like to comment?

16 DR. LI: Thank you. Hi. This is
17 Yangbing Li, the primary pharmacometrics reviewer
18 at the U.S. FDA. Yes. For the first question, for
19 the exposure-response analysis in DREAMM-14, as I
20 mentioned before, we have several concerns about
21 the exposure-response analysis due to the drug
22 modification beyond Cycle 1, which was not included

1 in the modeling. Also, we also see that there are
2 some possible trends for both efficacy and safety
3 in this analysis.

4 For the second question, for the M protein
5 modeling with the dose modification, for this model
6 that has not been fully reviewed by the agency,
7 well, we do have some concerns about these results
8 due to we can see from the simulation result, the
9 2.5 mg every 3-week dose shows a higher PFS
10 compared to the observed data in DREAMM-7.

11 We also have some concerns about the
12 extrapolation for PFS and dose modification
13 information in these models and simulation. This
14 is mainly driven by the lack of data in the lower
15 dose with longer dosing intervals due to the
16 limited number of patients in the study who
17 received combination treatment.

18 DR. VASAN: Does that conclude your
19 question, Dr. Beringer?

20 DR. BERINGER: Yes. Thank you.

21 DR. VASAN: Okay.

22 Dr. Frenkl?

1 DR. FRENKL: Thank you. Tara Frenkl,
2 industry rep. I had a question for one of the
3 scientific experts, please. I see from the data,
4 what's presented in both of the briefing books and
5 also today, that FDA makes their conclusion that a
6 lower dose may not have affected efficacy based on,
7 really, ORR, that was achieved, while the applicant
8 uses VGPR or better.

9 So I'm just interested in really
10 understanding both, clinically, which target is the
11 physician really shooting for with the patient and
12 also what is the data in the literature about the
13 correlation with PFS and OS.

14 DR. ABDULLAH: I'd like to call on
15 Dr. Lonial to address that question but also
16 provide some context on the current
17 relapsed/refractory multiple myeloma disease
18 setting.

19 DR. LONIAL: Thank you very much. Sagar
20 Lonial from Emory. What we know is that the deeper
21 response is associated with longer progression-free
22 survival and better clinical outcomes. So VGPR is

1 clearly a deeper response. It's a 90 percent
2 reduction in the protein as opposed to PR or
3 better, which is a 50 percent reduction in the
4 protein. We've had workshops with the FDA
5 identifying MRD as an important endpoint, and the
6 MRD, as you saw, was clearly higher in the groups
7 of patients that received bela compared to the
8 control arms.

9 So I think it is a really reasonable
10 approach. In the modern era of myeloma therapy,
11 overall response rate is nice, but it's always
12 80-90 percent, and you need something to
13 discriminate efficacy and VGPR or MRD as a way to
14 help us do that, and it clearly identified a
15 benefit from the patients receiving bela.

16 If I may respond to a previous question
17 about population relevance?

18 DR. VASAN: Yes, please.

19 DR. LONIAL: Thank you.

20 I think if you look at the subsequent
21 therapies, as Dr. Madan was asking, it would look
22 similar to what we would give in the U.S. I think

1 the question about the use of anti-CD38 antibodies
2 as part of an upfront treatment, limiting the
3 applicability of this treatment, it will only
4 magnify the difference because we agree, people are
5 getting anti-CD38s.

6 And it doesn't matter which control arm,
7 quite honestly, you chose; nothing is going to give
8 you a PFS comparable to 33 months, with the
9 exception of a CAR. And we showed you the efficacy
10 in terms of all the endpoints in my talk were
11 similar compared to a CAR. Whether you combine
12 pomalidomide, whether you combine carfilzomib, any
13 of these with anti-CD38s, it's going to be less
14 than 33 months.

15 So while I recognize the concern of the
16 applicability of the control arm, first of all, I
17 think it is an applicable control arm, but more
18 importantly, we're losing sight of the absolute
19 clinical benefit that's seen with that very long
20 progression-free survival.

21 DR. VASAN: Thank you, Dr. Lonial.

22 Dr. Frenkl, was that all your questions?

1 DR. KANAPURU: I think she wanted the FDA to
2 respond as well.

3 DR. VASAN: Okay. FDA, please.

4 DR. KANAPURU: And just to note, I just
5 wanted to follow up on what was recently said. I
6 think we still don't have the data. I appreciate
7 that there could be a theoretical improvement and
8 relevance, but on top of that, just to point out,
9 the overall data for dose exploration is very, very
10 limited, and I think the DREAMM-14 data also
11 highlights some of the issues with the
12 post-approval dose optimization.

13 There are a lot of reasons why the dose
14 modifications may be preferentially made in the
15 lower doses when people know that there's an
16 approved 2.5-milligram dose. I think there are a
17 lot of challenges in interpreting the data from a
18 post-approval study, in addition to the limited
19 number of patients overall at the proposed dosages
20 for the DREAMM-7 and DREAMM-8. Thank you.

21 DR. VASAN: Thank you.

22 Dr. Frenkl, is that all your questions?

1 DR. FRENKL: I had one more. Actually, just
2 with regard to the dose selection that then was
3 made for DREAMM-10, what were the reasons that led
4 you to a different conclusion for that population?

5 DR. ABDULLAH: Yes. We've actually taken a
6 very data-driven approach, whether it be across the
7 relapsed/refractory multiple myeloma setting, where
8 we've actually explored a number of different doses
9 and schedules, ranging between 1.9, all the way to
10 3.4, and then Q3, 4, 6, 8, and 12W across three
11 different studies and close to 400 patients.

12 We've done the same in newly diagnosed
13 multiple myeloma patients. We actually have data
14 from a number of different doses and schedules in
15 the front-line setting, and what we do observe,
16 based on the exposure-response analysis that we've
17 conducted, is newly diagnosed patients are actually
18 more sensitive to Blenrep therapy, so therefore,
19 you don't necessarily see the same steep
20 exposure-response curve. It's actually shifted
21 more towards the left. So therefore, we're able to
22 go to a lower dose of 1.9, and then stretch out the

1 schedule to every 8 weeks without necessarily any
2 loss in efficacy, while also trying to improve the
3 tolerability as well, too.

4 DR. VASAN: Does that answer your question,
5 Dr. Frenkl?

6 (Dr. Frenkl gestures yes.)

7 DR. VASAN: Okay. Thank you.

8 Dr. Spratt?

9 DR. SPRATT: No, my hand's down.

10 DR. VASAN: I apologize. Sorry. It's the
11 snafus of virtual.

12 Dr. Nowakowski?

13 DR. NOWAKOWSKI: To follow up on some of the
14 dose-finding studies, the number of patients in
15 dose-finding studies are relatively limited, and
16 here, early on, you had significant dose
17 interruptions and significant toxicity in this
18 study, with relatively wide confidence intervals in
19 terms of efficacy because of small cohorts.

20 I'm just curious from the sponsor
21 perspective why you didn't decide to expand those
22 cohorts to a better handle on the dosing early on

1 in the study development? I know time is critical
2 for the study development as well, but it looks to
3 me like a missed opportunity for better dose
4 optimization upfront.

5 DR. ABDULLAH: Well, as I've alluded to,
6 we've actually looked at close to 400 patients
7 worth of dose exploration data. You kindly refer
8 to the limited number of patients that were
9 explored across each dose court or dose schedule
10 cohort. It was about maybe 12 to 18 patients,
11 which is very typical of what is early-phase dose
12 exploration, and again, we looked at a number of
13 different doses and a number of different dosing
14 intervals.

15 What's probably important to highlight is
16 the relative dose intensity across all clinically
17 active doses remain between 40 to 60 percent, but
18 what we do see is, there is a trade-off on efficacy
19 that actually happens if you lower the starting
20 dose or extend the dosing schedule. And what we
21 saw, probably -- and I think this is the most
22 important part -- is with the starting dose of

1 2.5 mg/kg, a higher exposure during the first
2 6 months of treatment, and appropriate
3 implementation of the dose modification guidelines,
4 we saw the clinically meaningful effects in
5 progression-free survival, overall survival in
6 DREAMM-7, and a positive trend in DREAMM-8 and the
7 the depth of response.

8 This committee met last year to discuss the
9 relevance of depth of response and its correlation
10 to longer term endpoints such as progression-free
11 survival and overall survival. We see 2 and a half
12 to 5 times improvements in MRD negativity rates,
13 and I think that's all with the current dose and
14 schedule that have been implemented.

15 If it's possible, I'd like to actually call
16 on Dr. Paul Richardson to provide his perspective
17 on that, too.

18 DR. RICHARDSON: Thank you very much.

19 Dr. Paul Richardson, Dana-Farber, and a number of
20 points to share. I think most importantly, this
21 construct of increased dose, then dropping as you
22 move to a continuous therapy phase, is so well

1 established in myeloma. If you actually think
2 about it, every single drug we use in myeloma, we
3 actually employ a dose escalation/de-escalation
4 strategy, and I think that's incredibly important
5 to understand.

6 I think the other point is that in our own
7 experience, both as part of clinical trials and our
8 real-world experience in EAP, at Dana-Farber, we've
9 treated over 166 patients. It's incredibly
10 important to understand this construct of severity
11 of toxicity. Our hospitalization rate, over
12 166 patients to attributable bela toxicity, is 5
13 out of 166. In contrast, our CAR T patients have
14 100 percent hospitalization rate. Our bispecific
15 rates are 100 percent. Our toxicity profiles are
16 radically different.

17 So I would argue that in the setting of
18 belantamab mafodotin use, dose adjustment is
19 utterly appropriate to achieve these kinds of
20 outcomes with benefits seen. And most importantly,
21 in the management of toxicity, I fully understand
22 Dr. Pazdur's point, but we've actually had a very

1 good working relationship with ophthalmologic
2 consultants to manage eye toxicity in a very
3 manageable way, and you'll hear from our patients
4 in a moment about this. But I think this dose
5 escalation and de-escalation strategy is something
6 we're very comfortable with.

7 So I hope that's helpful, Dr. Nowakowski, in
8 understanding it.

9 DR. NOWAKOWSKI: Well, thank you. That's
10 helpful, but I'd like to circle back maybe to my
11 original question about the size of those cohorts,
12 exploratory cohorts, the dose optimization part. I
13 agree with you that this would be an average size
14 of the cohort typically seen in this study,
15 provided there are no unexpected problems, but you
16 did see them early on. You did see this unexpected
17 toxicity, and yet those cohorts were not expanded.
18 I'm just trying to understand better the
19 rationales.

20 DR. ABDULLAH: Yes. I'd like to call on
21 Dr. Mukhopadhyay to provide some additional context
22 around that as well, too.

1 DR. MUKHOPADHYAY: Thank you, and thank you
2 for pointing out the dose modifications as well.
3 As Dr. Abdullah pointed out, the dose modifications
4 were also happening even in the lower doses,
5 extended schedules. That's because the ocular
6 events happened, and there was a variability in the
7 resolution that happens across the board.

17 We had the same finding when we look
18 at -- if I can have CO-25 -- the ALGONQUIN study,
19 please. Thank you. You see, again, the
20 consistency from a separate independent study. And
21 as pointed out, the DREAMM-14 trial, which was a
22 randomized trial with four different dose cohorts

1 with 40 patients each, again, the same finding with
2 monotherapy where, granted, the response rates in
3 this heavily pretreated population was similar, but
4 when we look at DREAMM-14, slide CO-20, what's
5 important is, in this randomized trial, we saw
6 6 months of median PFS in a fourth-line plus
7 treated population compared to the other ones that
8 were ranging from 2.1 to 2.8 months.

9 If I may clarify, if I can also have that
10 simulation slide from the core deck up, please?
11 Thank you. CO-23.

12 It's important to note that these were
13 simulations that were performed, assuming dose
14 modifications in the same context as has been
15 happening with 7 and 8. What you see clearly with
16 that is that a lower starting dose, a less frequent
17 starting schedule, has sub-efficacious benefit when
18 it comes to PFS. It's important to note that we
19 performed also the same simulations without
20 modifications as well, and we see the exact same
21 results.

22 So what's important to note is not just the

1 size of the cohort, but the consistency of the
2 results from three separate studies, the
3 exposure-response analyses, as well as the
4 simulations, they all come to the same conclusion.
5 Thank you.

6 DR. NOWAKOWSKI: Thank you.

7 DR. VASAN: Can the FDA please respond to
8 this?

9 DR. TELARAJA: Hi. This is Deepti Telaraja,
10 FDA. I just wanted to comment that the applicant
11 has focused a lot on the efficacy and the depth of
12 response in the dose-finding studies; however, it
13 is also important to take into account the safety
14 and tolerability. And as presented in our main
15 presentation, there were very limited numbers of
16 patients in some of these cohorts, which limit the
17 conclusions that can be made; but there were
18 certain trends seen with lower doses and longer
19 dosing intervals having improved safety and
20 tolerability. So this really brings the question
21 of, if these cohorts had been larger, whether more
22 clear trends would have been seen. Thank you.

1 DR. PAZDUR: I would just also like to
2 comment, these were non-randomized studies that
3 you're looking and comparing PFS, which is quite
4 dangerous to do here.

5 DR. VASAN: Thank you.

6 DR. ABDULLAH: Just to clarify, just one
7 comment. Actually, DREAMM-14 is a randomized
8 study.

9 DR. VASAN: Okay. Thank you.

10 DR. ABDULLAH: Thank you.

11 DR. VASAN: So now, we will take a quick
12 15-minute break. We're a little over on time, so
13 we'll start the OPH session at 10:55. Panel
14 members, please remember there should be no
15 discussion of the meeting topic during the break
16 amongst yourselves or with any member of the
17 audience.

18 DR. ABDULLAH: Dr. Vasan, if it's possible,
19 can I respond to --

20 DR. VASAN: I'm sorry. We'll need to
21 continue. Thank you.

22 (Whereupon, at 10:42 a.m., a recess was

1 taken, and meeting resumed at 10:55 a.m.)

2 **Open Public Hearing**

3 DR. VASAN: We will now begin the open
4 public hearing session.

5 Both the FDA and the public believe in a
6 transparent process for information gathering and
7 decision making. To ensure such transparency at
8 the open public hearing session of the advisory
9 committee meeting, FDA believes that it is
10 important to understand the context of an
11 individual's presentation.

12 For this reason, FDA encourages you, the
13 open public hearing speaker, at the beginning of
14 your written or oral statement to advise the
15 committee of any financial relationship that you
16 may have with the applicant. For example, this
17 financial information may include the applicant's
18 payment of your travel, lodging, or other expenses
19 in connection with your participation in the
20 meeting.

21 Likewise, FDA encourages you, at the
22 beginning of your statement, to advise the

1 committee if you do not have any such financial
2 relationships. If you choose not to address this
3 issue of financial relationships at the beginning
4 of your statement, it will not preclude you from
5 speaking.

6 The FDA and this committee place great
7 importance in the open public hearing process. The
8 insights and comments provided can help the agency
9 and this committee in their consideration of the
10 issues before them. That said, in many instances
11 and for many topics, there will be a variety of
12 opinions. One of our goals for today is for this
13 open public hearing to be conducted in a fair and
14 open way, where every participant is listened to
15 carefully and treated with dignity, courtesy, and
16 respect, therefore, please speak only when
17 recognized by the chairperson. Thank you for your
18 cooperation.

19 We do have 14 speakers, and we would like to
20 hear from everyone. So in the interest of respect
21 and time, at the 4-minute point, I will acknowledge
22 that, and please know that we want to hear from all

1 of you. Thank you.

2 For speaker number 1, please unmute and turn
3 on your webcam. Will speaker number 1 begin and
4 introduce yourself? Please state your name and any
5 organization you're representing, for the record.

6 You have four minutes.

7 MS. YOUNG: Good morning. My name is Ann
8 Quinn Young, and I am Chief --

9 DR. VASAN: I'm sorry. We can't hear you.

10 (Pause.)

11 DR. VASAN: If it's alright, Ms. Young,
12 we'll skip, and then we'll come back to you.

13 Speaker number 2, please unmute and turn on
14 your webcam. Will you please begin and introduce
15 yourself? Please state your name and any
16 organization you are representing, for the record.

17 You have four minutes.

18 DR. USMANI: Thank you. Can you all hear
19 me?

20 DR. VASAN: Yes.

21 DR. USMANI: Good morning, everyone. My
22 name is Saad Usmani. I'm a practicing hematologist

1 and medical oncologist. I serve as the Chief of
2 the Myeloma Service at Memorial Sloan Kettering
3 Cancer Center in New York. I also serve as the
4 Chair of the NCTN Alliance Myeloma Committee, one
5 of the three U.S. cooperative groups that conducts
6 clinical trials focused on multiple myeloma and
7 associate disorders. I would like to thank all of
8 you to allow me to speak in today's session. To
9 declare CoI, I have previously served on the IDMC
10 and as a PI on previous GSK studies. I'm not being
11 compensated by GSK for this testimony.

12 I have had the privilege of treating
13 multiple myeloma patients over the past 18 years in
14 the states of Arkansas, in North Carolina, and more
15 recently in the tri-state area in the northeast.
16 I've had direct and indirect interactions with
17 patients, caregivers, and oncologists in urban,
18 suburban, and rural settings.

19 Access to myeloma drugs in rural and
20 suburban communities remains a significant
21 challenge. It contributes to disparities in
22 treatment outcomes. Patients in these areas often

1 face limited availability of specialized care, few
2 clinical trial options, and delays in diagnosis.
3 In specific, access to novel immune and cellular
4 therapies is almost non-existent for many of these
5 myeloma patients due to travel distances to
6 tertiary care centers and the challenges in
7 logistics. This is especially true for elderly or
8 socio-economically disadvantaged patients, as you
9 heard from several of the colleagues early in the
10 morning as well.

11 Additionally, I hear from our suburban and
12 rural providers about the challenges of timely
13 referrals, especially for commercial cellular
14 therapy options. So having an effective
15 off-the-shelf option like belantamab mafodotin
16 triplets will be very important to improve the
17 multiple myeloma care access across the United
18 States.

19 As a practicing clinician, I have no doubt,
20 hearing the testimony and talks from both sides,
21 about the positive primary endpoint results of the
22 DREAMM-7 and 8 trials and the dosing and schedules

1 examined to mitigate ocular side effects and their
2 management. I do feel as a clinician, for my
3 patients, this tips the benefit-risk scale in favor
4 of bela-maf triplets for my patients.

5 I have to note that both these trials
6 provide one of the highest PFS rates among the
7 contemporary phase 3 studies. DREAMM-7 shows OS
8 benefit as well, and that's reassuring to see.
9 Even for DREAMM-8, there is no detriment in OS; in
10 fact, there's a trend favoring the bela triplet
11 there as well. Importantly, while corneal side
12 effects do remain an issue, they are fewer severe
13 ocular side effects compared to some of the earlier
14 experienced.

15 At our center, we have advanced
16 relapsed/refractive myeloma patients who responded
17 to bela-maf as monotherapy back in the year 2020
18 and 2021, who remain on treatment with sustained
19 responses, with minimal ocular side effects to this
20 day. That's a testament that mitigation strategies
21 can be effective and help our patients. Within the
22 Alliance Myeloma Committee, we actually have a

1 novel bela-maf triplet with every 8-week dosing,
2 which is actually enrolling across the United
3 States in various communities, urban, suburban, and
4 rural communities. That would not be possible if
5 logistics were a real issue.

6 Every patient facing cancer deserves hope.
7 That includes access to new innovative treatments.
8 Oncologists and patients must be empowered to
9 explore all available options together, weighing
10 the potential benefits and risks as a team. These
11 conversations are vital. They ensure care is not
12 only evidence based, but it's also deeply personal.
13 New therapies may offer improved outcomes, even
14 when side effects are possible. We observe this in
15 our clinics every day, and we try to do our best to
16 create that balance for our patients.

17 By fostering open, informed dialogue, we
18 give our patients the urgency --

19 DR. VASAN: I'm sorry. We're at four
20 minutes now.

21 DR. USMANI: -- to their journey. And as
22 oncologists, I would really appreciate if we get

1 the opportunity to provide the best individualized
2 care, grounded in both science and compassion.
3 Thank you.

4 DR. VASAN: Thank you.

5 Speaker number 1, please unmute yourself and
6 turn on your webcam. Could you please begin and
7 introduce yourself? Please state your name and any
8 organization you're representing, for the record.

9 You have four minutes.

10 MS. YOUNG: Good morning. My name is Anne
11 Quinn Young, and I am Chief Mission Officer at the
12 Multiple Myeloma Research Foundation where I've
13 worked for almost 23 years. I'm speaking today on
14 behalf of the organization and the hundreds of
15 thousands of patients, caregivers, and families we
16 serve. The MMRF is a national 501(c)(3) and is the
17 largest private funder of myeloma research. While
18 we receive support for research initiatives and
19 educational programming from nearly every company
20 with a myeloma program, often in the form of cost
21 sharing and/or grants, we are not being compensated
22 for this testimony.

1 The mission of the MMRF is, and always has
2 been, to accelerate a cure for each and every
3 patient. As a patient-founded and focused
4 organization, everything that we do as an
5 organization prioritizes patients over anyone else.
6 The MMRF supports the development of safe and
7 effective treatments for patients at every stage of
8 their disease on the path to a cure. Patients with
9 relapsed/refractory disease has always been a focus
10 of ours given the significant and enduring unmet
11 need in this population.

12 Multiple myeloma remains an incurable
13 disease where patients nearly uniformly relapse,
14 and typically with each line of therapy, the
15 likelihood of response and the duration of response
16 meaningfully declines. The MMRF supports
17 belantamab mafodotin, or bela-maf, as a safe and
18 efficacious therapeutic option for relapsed and
19 refractory multiple myeloma. This is because until
20 we have curative therapy, having options like
21 bela-maf available, particularly earlier in the
22 disease course, will help to extend

1 progression-free survival and time to next therapy,
2 allowing patients greater opportunities to reach
3 and celebrate special milestones.

4 Furthermore, as an off-the-shelf option,
5 bela-maf can be administered in community oncology
6 settings. This has the potential to reduce access
7 disparities for patients who are unable to travel
8 to major academic centers, furthering our
9 commitment to promote health equity and ensure all
10 patients benefit from advancements in care.

11 When considering bela-maf, with its unique
12 mechanism as well as safety and efficacy profile,
13 the MMRF emphasizes the importance of shared
14 decision making between patients and providers. As
15 part of our focus on empowering patients in the
16 myeloma community, in pursuit of more equitable
17 access to quality care and outcomes, the MMRF
18 believes in providing patients with the resources
19 and tools to critically evaluate treatment options
20 and make the most informed decision for their
21 individual situation. The MMRF is strongly
22 committed to educating both patients and

1 caregivers, as well as healthcare providers, about
2 treatment options such as bela-maf and clinical
3 strategies in all settings.

4 Finally, successful use of bela-maf requires
5 a team-wide approach to toxicity management,
6 including dose modifications, monitoring, and
7 supportive care. We advocate for strategies that
8 engage the full care team to help patients remain
9 on effective therapies while maintaining their
10 quality of life.

11 Thank you so much to the committee for
12 providing me with the time to present today and to
13 the FDA for its long-standing commitment to making
14 effective and safe treatments available to myeloma
15 patients at every disease stage over the last
16 20-plus years. Many of these treatments have been
17 transformative, and most patients are enjoying a
18 longer survival and better quality of life after
19 their diagnosis than ever before.

20 DR. VASAN: Thank you for your comments.

21 Speaker number 3, please step up to the
22 podium and introduce yourself. Please state your

1 name and any organization you are representing, for
2 the record. You have four minutes.

3 MS. CARTWRIGHT: My name is Kathy
4 Cartwright, and thank you for letting me come and
5 share my experience with Blenrep. GSK is
6 reimbursing me for my travel. I cut our family
7 vacation in half to be here today with all of you
8 because it's that important to us and to my family.

9 I'm here because I started Blenrep four
10 years ago. It saved my life. It's one of the
11 easiest drug treatments I've had. It's only a
12 30-minute infusion, no pre-meds, no GI issues, no
13 headaches, no steroids. A few days before
14 infusion, I see my eye doctor. He gives me a
15 thorough eye exam. I get to see the chart, eye
16 pressures checked, and he examines my cornea.

17 My side effects from Blenrep are very minor
18 and they're very manageable. I get blurry vision,
19 dry eyes, sometimes sensitive to bright glares and
20 lights, but I use non-preservative eye drops that
21 you can get at any drug store, sunglasses, and
22 readers, but only use them when I need them. I

1 also have had multiple myeloma for 24 years. I've
2 taken many, many treatments, and I've had many,
3 many side effects, and some of them are permanent
4 side effects.

5 In 2020, when my myeloma turned into
6 high-risk, extramedullary myeloma, I had 12 tumors
7 that I could see and feel. I also had tons of
8 tumors inside of me that I couldn't see or feel.
9 With just two treatments of Blenrep, I could no
10 longer feel or touch the 12 tumors. I couldn't see
11 them. I couldn't feel them. So my doctor had a
12 PET scan and MRI done, and my tumors internally
13 were shrinking from 8 centimeters down. They
14 shrunk, they disappeared, and no new ones grew.

15 That was four years ago. Today, my myeloma
16 test that I just recently had and a bone marrow
17 biopsy, not one myeloma cell was found in millions
18 of cells. I had my PET scan and my MRI done. No
19 more tumors. I don't have any of them. This is a
20 miracle for me. This drug pulled me literally off
21 my deathbed. I was this close to calling hospice.
22 I was up against a wall. I didn't have any more

1 treatment options.

2 For me, these side effects of dry eye,
3 blurry vision, and sensitivity are definitely worth
4 it. If Blenrep can help me, it can help a lot of
5 patients. Please, whatever you do, please get it
6 out there. Thank you.

7 DR. VASAN: Thank you for that testimony.

8 Speaker number 4, please step up to the
9 podium and introduce yourself. Please state your
10 name and any organization you're representing, for
11 the record. You have four minutes.

12 MR. TEITELMAN: Good morning. My name is
13 David Teitelman, and I was diagnosed with multiple
14 myeloma in December of 2018. I am not receiving a
15 fee or compensation for my time today, but I will
16 have my travel expenses reimbursed by
17 GlaxoSmithKline. I am also a volunteer on the
18 GlaxoSmithKline Multiple Myeloma Patient Expert
19 Council.

20 I wish to convey my experience as a patient
21 regarding the treatment's effectiveness, side
22 effects, and impact on my quality of life. My

1 treatment with a triplet of belantamab mafodotin,
2 pomalidomide and dexamethasone began in March of
3 2022, and I have been in remission since that time.
4 This followed six prior failed lines of treatment,
5 with each ranging from 2 to 11 months. The
6 effectiveness of the belantamab mafodotin began
7 almost immediately. Approximately one month
8 following beginning of treatment, my light chain
9 numbers and free kappa-lambda ratio were all
10 normal, and I've remained so for approximately
11 3 years and 4 months. In my case, the
12 effectiveness of the treatment has been miraculous.
13 I would not be alive today without this treatment.

14 Regarding side effects, I have only one, and
15 this involves my vision. At approximately 2 weeks
16 following infusion, my vision is impacted. I am
17 normally nearsighted and only wear glasses for
18 assistance with distance such as improving roadside
19 recognition while driving or going to a movie. My
20 vision usually remains impacted for approximately
21 3 weeks, and during this time, my vision actually
22 flips where my distance vision greatly improves and

1 my near vision becomes blurry with some difficulty
2 focusing when reading.

3 I read a lot, and to overcome the impact on
4 my near vision, I change to a dark background on my
5 phone or tablet, which allows me to continue
6 reading without any difficulty. For example, my
7 most recent infusion was approximately four weeks
8 ago, and this is a font in a format which I could
9 read while my eyes are still impacted from the last
10 infusion.

11 When driving during the time frame when my
12 eyes are impacted, I can read traffic signs in the
13 distance, read license plates of cars passing me or
14 even several car lanes ahead of me. At the
15 conclusion of the approximate 3 weeks of vision
16 impact, my eyes return to an acceptable grade to
17 allow my next scheduled infusion to take place.

18 From a quality-of-life standpoint, I could
19 not be happier. When I first began this treatment
20 regimen over three years ago, I was scheduled to
21 receive infusions every 4 weeks, but this was not
22 enough time for my eyes to return to an acceptable

1 grade to be cleared for my next scheduled infusion.
2 Within the first year of treatment, infusion
3 schedule was extended to 6 weeks, which provided
4 enough time for my eyes to recover, then 8 weeks
5 during the early portion of year 2. This was
6 followed by extending the infusion schedule to
7 10 weeks and possibly every 12 weeks in the future.

8 A few days prior to each scheduled infusion,
9 I have a brief appointment, which is usually 15 to
10 20 minutes with an ophthalmologist to ensure my
11 eyes have returned to an acceptable grade to allow
12 the scheduled infusion to take place. The
13 treatment schedule has had minimal impact on my
14 life and my family's involvement with my care. The
15 infusion schedule is far from a hardship and is low
16 impact and very easy to manage. As a comparison, I
17 have dental checkups scheduled every three months,
18 so I think everyone can understand why my wife and
19 I are so happy with the freedom the treatment
20 schedule affords us.

21 The treatment schedule has allowed me to
22 plan, schedule, and attend events with my family

1 and friends with minimal thought or effort
2 regarding potential conflicts. I can also reflect
3 on and compare this to prior treatment lines that
4 in some cases required weekly visits. The
5 difference is certainly dramatic. I want to thank
6 everyone for their time and allowing me to present
7 my story and perspective.

8 DR. VASAN: Thank you.

9 Speaker number 5, please step up to the
10 podium and introduce yourself. Please state your
11 name and any organization you're representing, for
12 the record. You have four minutes.

13 MS. OLSON: Thank you. I'm Deialia Olson
14 from North Carolina. Thanks so much for having me
15 here to talk with you today about Blenrep. I have
16 no relationship with GSK other than using the drug;
17 however, they are reimbursing me for my travel
18 experience expenses for attending this conference.

19 I'm a long-term myeloma survivor having been
20 diagnosed 20 years ago. And back then, the
21 prognosis and possibilities seemed pretty scary,
22 but I've been one of the really fortunate ones.

1 I've managed so far to avoid many of the more
2 devastating possible effects of the disease, such
3 as bone pain and fractures, numbness and tingling,
4 worst-case scenario, and early death. Mostly, I've
5 had to deal with fatigue and other side effects
6 from the many drug trials I've been involved in,
7 along with a stem cell transplant in 2008.

8 As my oncology team has worked to keep my
9 myeloma under control, some of the side effects
10 that I've had from the chemotherapy drugs I've
11 taken over the year are neuropathy, which caused
12 pain in my lower legs that lasted about a year, and
13 that was awful. I've also been on drug combos that
14 left me nauseated 24 hours a day, and of course,
15 I've been on chemotherapy drugs that just didn't
16 work for me or that eventually stopped controlling
17 my myeloma.

18 Then in May 2022, I was fortunate to be
19 included in a Blenrep trial, and it immediately
20 brought down my M spike and has kept it down
21 consistently for the past three years. I was, of
22 course, briefed about the side effects that I might

1 experience with Blenrep with my eyes and my vision,
2 and that's gone very much as expected. After my
3 infusion, I'll experience dry, itchy eyes and the
4 gradual blurry of my vision. It's like a roller
5 coaster. As you've heard from others, my eyesight
6 worsens for a few weeks following my infusion, and
7 then gradually improves afterwards.

8 But it can be challenging. I'm a proud
9 American so, of course, I have my big 70-inch TV in
10 the living room and a chair about 10 feet away. My
11 husband, when I first started the treatment, I
12 would ask him to read everything on the TV, on that
13 70-inch TV, and finally he bought me a little pair
14 of binoculars so I could actually see that.

15 My optometrist determines, of course,
16 whether I'm ready for my Blenrep infusion each
17 time, depending on my corneal condition, and he
18 always asks if I'm remembering to use my eye drops.
19 I tell him I definitely remember to take my eye
20 drops because my eyes will remind me, drops during
21 the day, an ointment at night, and occasionally a
22 session with my heated eye mask. That's my

1 routine.

2 Other things I do routinely are walking
3 daily for exercise, gardening, cooking, and
4 traveling to see friends and family. And I'm so
5 thankful to feel well enough to enjoy these
6 activities because, bottom line, dealing with my
7 eye issues seems a small price to pay to keep my
8 myeloma at bay and leave me feeling well enough to
9 enjoy my life.

10 I'm very excited that you're on the verge of
11 making Blenrep available to other myeloma patients.
12 I hope very much so. It has been a godsend for me,
13 and I hope that I and many others will be able to
14 continue benefiting from this drug for many years
15 to come. Thank you so much.

16 DR. VASAN: Thank you very much.

17 Speaker number 6, please unmute and turn on
18 your webcam. Will you please begin and introduce
19 yourself? Please state your name and any
20 organization you are representing, for the record.
21 You have four minutes.

22 MS. MORAN: Good morning. I'm Diane Moran,

1 the interim CEO of the International Myeloma
2 Foundation. I have no conflicts to report as it
3 relates to our testimony. We are speaking today to
4 strongly support BLA 761440, use of Blenrep,
5 belantamab mafodotin.

6 The International Myeloma Foundation brings
7 both the patient voice and the science to this
8 conversation. As the convener of the International
9 Myeloma Working Group, a global network of 350
10 myeloma experts in partnership with more than
11 150 myeloma support groups across the U.S., IMF
12 serves as the bridge between evidence and lived
13 experience. These are our superpowers, convening
14 world class research while standing shoulder to
15 shoulder with patients navigating an incurable and
16 unforgiving disease.

17 There's a saying, "Man plans and God
18 laughs," but for myeloma patients, it often feels
19 like the disease laughs last. This is a cancer
20 that doesn't just threaten life, it changes it
21 instantaneously and irreversibly, robbing patients
22 of control and choice, shrinking their dreams,

1 stretching their fears.

2 Now imagine, not as a scientist, not as a
3 regulator, but as a human being, what it feels like
4 to be told you have myeloma. Imagine the stillness
5 in the room, the air leaving your lungs, the plans
6 you made, retirements, weddings, graduations,
7 replaced by doctor visits, infusions, scans,
8 statistics. Now imagine learning there are
9 treatments that work, that offer real hope, but
10 they may not be available to you. Maybe you're too
11 sick. Maybe you're on the wrong insurance plan.
12 Maybe the treatment was once available and then is
13 taken away. This is the lived reality of too many
14 patients we serve.

15 Myeloma remains incurable. We're making
16 powerful progress, deeper remissions, longer
17 survival, a pipeline full of innovation, but
18 progress must be matched by access. A therapy that
19 exists but is out of reach is not hope; it is
20 heartbreak. Belantamab mafodotin offers an
21 evidence-based path forward for patients who need
22 options. When it was first introduced, it brought

1 promise and, for many, meaningful benefit. We have
2 seen patients even treated as a single agent
3 experience deep and durable responses. Some have
4 successfully stayed on treatment for years.

5 Today, we have stronger data to support
6 belantamab's value through the DREAMM-7 and
7 DREAMM-8 trials. We now understand how to better
8 manage the ocular side effect. The real-world
9 clinically experienced physicians are mitigating
10 these risks effectively through proactive
11 monitoring and dose adjustments.

12 Now, these are real adverse effects but,
13 importantly, they are reversible. And for many
14 patients, the benefit and progression-free survival
15 outweighs the potential risks. This is a chance to
16 expand the toolbox for patients who need time they
17 do not currently have. What patients want is not
18 unreasonable. They want time to see one more
19 graduation, walk a daughter down the aisle, watch a
20 grandchild take their first steps. They want the
21 dignity of options. They want the power to hope.

22 These patients did not choose myeloma;

1 myeloma chose them. Now, we must choose them. We
2 must give them choices because without options,
3 there is no control. Without access, there is no
4 hope. Belantamab mafodotin gives patients a
5 chance, not a guarantee, but a chance to reclaim
6 moments that matter, to rewrite the timelines this
7 disease tries to erase.

8 There's no such thing as acceptable loss
9 when it's your life or your loved one's. If we can
10 offer a therapy that helps, we must offer it. If
11 we can relieve suffering, we must not delay. If we
12 can deliver hope, real hope, we must make it real.
13 And with the right options, it is patients who may
14 laugh again, not because the disease is gone, but
15 because possibility has returned, because they have
16 been seen, heard, and given a chance. Let's give
17 them the power to plan again, to dream again, to
18 live again. I thank you for listening and keeping
19 both the science and the patient voice at the
20 center of this critical decision.

21 DR. VASAN: Thank you.

22 Speaker number 7, please step up to the

1 podium and introduce yourself. Please state your
2 name and any organization you are representing, for
3 the record. You have four minutes.

4 MS. AHLSTROM: Good morning. My name is
5 Jenny Ahlstrom. I'm a multiple myeloma patient
6 diagnosed in 2010 and the CEO of HealthTree
7 Foundation, the leader in digital health advocacy
8 in the multiple myeloma and hematology space. GSK
9 supports various HealthTree educational programs
10 but is not paying for my travel or compensating me
11 for my time to be here.

12 Thank you for the opportunity to speak to
13 you today as a patient and someone who represents
14 hundreds of thousands of myeloma patients. Through
15 our programming, we serve over 1.5 million
16 patients, caregivers, family members, and others
17 interested in myeloma annually. I'd like to deeply
18 thank each member of the FDA. Myeloma patients'
19 lives are being lengthened thanks to innovative
20 work from companies like GSK and others you are
21 approving. Your approvals are giving patients
22 choices and longer life.

1 Myeloma care has radically changed the
2 length of life in the last 20 years, yet we still
3 do not have a known cure. According to current
4 SEER data, 38 percent of patients are still dying
5 in under five years, and even with CAR T and
6 bispecific antibodies, why we all hope to be
7 curative saviors, patients are still relapsing and
8 dying of multiple myeloma.

9 Blenrep represents another needed choice,
10 one more tool in the toolbox that can help patients
11 live longer and better with myeloma for several
12 reasons. First, this is a treatment that can be
13 easily given in the community setting. Access
14 remains a big issue for CAR T, and today only
15 18 percent of patients who are eligible for CAR T
16 are receiving CAR T. Bispecifics face a similar
17 issue. Any therapy that has planned
18 hospitalization is going to have this challenge.

19 These exciting options are just harder to
20 access, and the reality is that over 80 percent of
21 patients are seeing local community providers for
22 their care. Blenrep is a convenient treatment

1 option in frequency and location, and the low rate
2 of hospitalization and easy administration makes it
3 an attractive option for both the patient and
4 clinical team for close-to-home access.

5 Second is treatment does not depend on a
6 fully functional immune system to be effective.
7 Given the older patient population and immune
8 system damage caused by myeloma itself, many
9 immunocompromised patients may not respond to
10 immunotherapies regardless of their potency because
11 their immune systems are simply too impaired.

12 Third, the side effects are known,
13 manageable, and reversible. Dr. Robert Kyle of
14 Mayo Clinic says there is no drug on the market
15 today that doesn't have a side effect. We as
16 patients have gotten quite used to dealing with
17 side effects in myeloma like neuropathy on Velcade,
18 feeling OCD and angry on dex, or having daily
19 diarrhea or rash on Revlimid, all side effects that
20 affect daily living. CAR T and bispecifics bring
21 new and serious side effects: cytokine release
22 syndrome, neurotoxicity, ICANS, Parkinsonianism,

1 and increased rates of infection, particularly
2 upper respiratory.

3 The eye-related side effects are clearly
4 documented with Blenrep. Patients know that they
5 need to be monitored by an optometrist or
6 ophthalmologist. And as an advocacy leader who is
7 in constant communication with patients and
8 providers, I've not heard any instance of permanent
9 visual damage, and I know some Blenrep patients who
10 report no blurry vision at all. One patient, a
11 HealthTree coach who has been on over 10 lines of
12 therapy, comments to me all the time that Blenrep
13 was the easiest tolerated therapy she's ever been
14 on. And it's very normal to work with your doctor
15 to make dose and treatment adjustments in myeloma
16 therapy. Patients do that all the time. Side
17 effects are part of this package that we get with
18 having myeloma. We wish we could avoid them, but
19 they are better than death by myeloma, so we make
20 decisions and move forward.

21 As a patient and advocate, I support the
22 approval of Blenrep based on the DREAMM-7 and 8

1 studies. The progression-free survival benefit
2 clearly shows that this drug is very effective and
3 works extremely well. It can be given locally. It
4 can be flexibly used in common myeloma
5 combinations. Approving Blenrep gives me the
6 choice and freedom to decide with my doctor what is
7 best for my unique and individual situation for my
8 disease burden, for my travel requirements, and for
9 my side effects. Thank you.

10 DR. VASAN: Thank you.

11 Speaker number 8, please step up to the
12 podium and introduce yourself. Please state your
13 name and any organization you are representing, for
14 the record. You have four minutes.

15 DR. SUNSHINE: Thank you. My name is
16 Dr. Sarah Sunshine. I'm a cornea specialist and
17 ophthalmologist at the University of Maryland
18 School of Medicine. I study and treat patients
19 with ocular complications from cancer therapies.
20 I'm in a unique position there to have a dedicated
21 eye clinic within our cancer center, which has
22 allowed me to care for many of these patients.

1 I've also spoken with colleagues across the country
2 about their experiences treating ocular side
3 effects from antibody drug conjugates, which are
4 becoming increasingly common.

5 It is important for me to note that I've
6 consulted for GSK specifically on their Eye Care
7 Provider Advisory Council, as well as other
8 pharmaceutical companies, but I'm here on my own
9 behalf today. I'm uncompensated for this because I
10 really think it's important to preserve access for
11 our patients and the patients that I've had the
12 opportunity to treat.

13 Belantamab is a second-line treatment for
14 relapsed or refractory multiple myeloma. Like many
15 effective cancer therapies, it carries risks,
16 including ocular toxicity. These events are
17 predictable, manageable, and reversible, especially
18 when patients are monitored appropriately. Many of
19 our patients experience some form of ocular events,
20 but it varies widely. It can be subtle, like
21 corneal surface changes like you saw today, or more
22 noticeable like the blurry vision or discomfort

1 that you've heard about. But the most important
2 point that I hear, and that I feel repeatedly
3 taking care of these patients, is that most
4 patients can continue treatment with dose
5 modifications, and these events resolve.

6 In my practice, I've seen patients with
7 moderate or even significant changes regain
8 functional vision after dose modification. The
9 corneal epithelium recovers. These are not
10 intraocular complications. Unlike some other ADCs,
11 these do not cause uveitis or inflammation inside
12 the eye, and it doesn't cause retinal swelling or
13 inflammation. While those intraocular events may
14 be less common, they're still more severe, and the
15 toxicity with belantamab is limited to the corneal
16 surface, and we can manage that.

17 How does this work in real life? In my
18 experience, and talking to other eyecare providers,
19 I think it's threefold. First, these patients are
20 highly motivated. You've heard from many of them
21 today. This is a second-line therapy. Even those
22 with visual symptoms that I've had the ability to

1 treat repeatedly tell me how they would do whatever
2 it takes to stay on this drug. They understand the
3 risks and overwhelmingly view the temporary vision
4 changes as worth it.

5 Second, the corneal side effects, though
6 common, are manageable. With artificial tears and
7 close monitoring, and the reassurance that dose
8 holds don't reduce efficacy, patients can maintain
9 both vision and access to this life-extending
10 therapy. And third, this model of care, in my
11 opinion, is scalable. Ocular monitoring is done
12 with standard tools. A slit-lamp exam and
13 fluorescein staining and visual acuity are standard
14 of care for every eyecare provider. We all have
15 those tools and are comfortable using them.

16 In addition to the educational programming
17 that's been implemented, both ophthalmologists and
18 optometrists in the community and academic settings
19 can safely manage these patients. Belantamab
20 requires a baseline eye exam and close monitoring,
21 but I've seen firsthand how this system works in
22 practice with both my own clinic and in

1 coordination with community physicians.

2 In summary, I just want to clarify, ocular
3 events occur in many of these patients, but they're
4 predictable, reversible, and manageable. Every
5 eyecare provider is equipped to monitor and support
6 these patients, and with dose holds and
7 modifications, patients can maintain their vision
8 and stay on therapy; and critically, patients
9 overwhelmingly want to continue this treatment. I
10 want to thank you for the opportunity to share my
11 experience. Thanks.

12 DR. VASAN: Thank you.

13 Speaker number 9, please unmute yourself and
14 turn on your webcam. Please begin and introduce
15 yourself. Please state your name and any
16 organization you're representing, for the record.
17 You have four minutes.

18 DR. LEE: Good morning. My name is Dr. Hans
19 Lee, and I'm a medical oncologist and the Director
20 of Myeloma Research at the Sarah Cannon Research
21 Institute. I have received consulting fees from
22 the applicant GSK in the past, although I'm not

1 being compensated for this testimony.

2 I have dedicated my career to advancing the
3 treatment for patients with multiple myeloma and
4 have significant personal experience in
5 administering belantamab mafodotin in both the
6 research and standard of care context. I want to
7 share three points today -- number one, efficacy;
8 number two, safety; and number three, access -- to
9 convey my strong support for the regulatory
10 approval of bela-maf in combination with bortezomib
11 and dexamethasone and pomalidomide and
12 dexamethasone.

13 First, efficacy. The efficacy of bela-maf
14 has been demonstrated in the DREAMM-7 and DREAMM-8
15 clinical trials in relation to depth of response,
16 progression-free survival, and in the case of
17 DREAMM-7 overall survival. How it really stands
18 out is the magnitude of benefit, with a nearly
19 tripling of the numeric progression-free survival
20 in the bela-maf-based triplets versus standard of
21 care triplets. The study design in itself is also
22 noteworthy since these were head-to-head 3 drugs

1 versus 3 drug comparisons with daratumumab and
2 bortezomib-based triplets.

3 I think this also speaks to the biological
4 significance of BCMA as a targeted myeloma
5 consistent with the strong efficacy we have seen
6 with BCMA targeting CAR T and bispecific
7 antibodies, and having brought access to
8 BCMA-targeted therapies is critical for myeloma
9 patients in the United States, which I'll touch on
10 more later.

11 Now, to point number two regarding safety,
12 the safety profile of bela-maf has been well
13 characterized. It is well established that the
14 drug can lead to ocular adverse events, primary
15 keratopathy, and it is important that prescribers
16 are aware of this and work together with their
17 local eyecare specialists to manage these adverse
18 events. However, in my own personal experience,
19 the ocular adverse events are effectively managed
20 with dose delays and dose reductions and is
21 reversible when employing such strategies.

22 Importantly, the majority of patients had

1 deepening or stabilization of responses despite
2 dose delays and dose reductions of bela-maf in
3 DREAMM-7 and DREAMM-8. This is also very
4 consistent with my own personal experience with
5 bela-maf. When decreasing dosing frequency to
6 every 8 or even every 12 weeks as done in DREAMM-8,
7 the rates of ocular toxicity are much lower at such
8 infrequent dosing intervals.

9 Finally, I want to discuss my third and
10 final point regarding access, which is so critical.
11 I have already mentioned the importance of BCMA as
12 a target, and while we do have CAR T and bispecific
13 therapies at target BCMA, which are highly
14 efficacious, the reality is that the majority of
15 myeloma patients in 2025 who are eligible to
16 receive these therapies do not have access to CAR T
17 or bispecifics in their local treatment setting.

18 The administration of CAR T and bispecific
19 antibodies require additional clinical
20 infrastructure to monitor for potential toxicities,
21 including cytokine release syndrome, ICANS, and
22 infection monitoring. Consequently, the

1 administration of these agents still remains mostly
2 limited outside of academic and large community
3 based practices. On the other hand, bela-maf
4 provides a highly effective, off-the-shelf option
5 with no risk of CRS and ICANS that will allow
6 patients access to a highly effective BCMA-targeted
7 therapy who otherwise may not be candidates for
8 CART T or bispecifics due to geography, frailty,
9 patient preference, or other reasons.

10 In summary, I want to reiterate the three
11 points I discussed: efficacy, safety, and access.
12 While it may sound cliche, the reality is that one
13 size doesn't fit all for myeloma patients when it
14 comes to treatment. The addition of belantamab
15 mafodotin, which has shown overall survival
16 benefit, to the myeloma therapeutic armamentarium
17 will provide broad and critical access to an
18 off-the-shelf, BCMA-targeted option for patients
19 with multiple myeloma. Thank you.

20 DR. VASAN: Thank you. That was perfectly
21 four minutes.

22 Speaker number 10, please unmute yourself

1 and turn on your webcam. Please introduce
2 yourself. Please state your name and any
3 organization you are representing, for the record.
4 You have four minutes.

5 DR. BERDEJA: Good morning, and thank you
6 for allowing me to address the committee. My name
7 is Dr. Jesus Berdeja. I'm here representing myself
8 and not being compensated for my testimony. I am a
9 clinical researcher, and I work with most
10 pharmaceutical companies working in myeloma,
11 including the sponsor. I'm the Director of
12 Multiple Myeloma Research at the Greco-Hainsworth
13 Tennessee Oncology.

14 Tennessee Oncology is a large, greater than
15 100 physician practice that cares for over half of
16 cancer patients in Middle and East Tennessee. We
17 are a sophisticated practice that can provide
18 state-of-the-art research and standard of care
19 treatment such as CAR T therapy. Unfortunately,
20 not all therapies are readily available in all of
21 our clinics, and as a result, many of our patients
22 may need to travel long distances, often

1 4 to 5 hours to reach us.

2 My personal practice solely focuses on
3 seeing patients with multiple myeloma. In my
4 opinion, in a patient who has been exposed to a
5 proteasome inhibitor, an IMiD, and an anti-CD38
6 antibody, the optimal next line of treatment should
7 be a BCMA-directed therapy. Most patients will be
8 triple-class exposed, possibly refractory as early
9 as in their second line of treatment, and currently
10 the only BCMA-directed therapy approved in this
11 setting is CAR T.

12 Unfortunately, as you know and have heard,
13 CAR T is a treatment that for many reasons is
14 currently only available to a small minority of the
15 patients that could benefit. Many patients live
16 too far from specialty centers, they lack
17 sufficient caregiver support, and they're unable to
18 drive or just too frail. And this is just to name
19 a few roadblocks to logistically complicated
20 therapies such as CAR T. Thus, introducing another
21 effective and accessible BCMA-directed therapy into
22 this space would be of significant benefit to a

1 population in great need.

2 The DREAMM-7 and DREAMM-8 studies were
3 head-to-head triplet versus triplet comparisons
4 that showed impressive progression-free survival
5 and overall survival benefit favoring the
6 belantamab combinations, even against an
7 anti-CD38-containing triple regimen. I truly
8 believe these data show that belantamab mafodotin
9 combinations can help fill an unmet need.

10 I am equally impressed by the relatively
11 good tolerance of belantamab mafodotin. Except for
12 the potential ocular toxicity, there's very little
13 other toxicity, and patients often tell me they
14 feel like they are not on any treatment. And
15 patients who do develop ocular toxicity, most do
16 very well, often are asymptomatic, and the symptoms
17 they do develop are invariably reversible with dose
18 adjustments or holds, with the assistance of
19 readily available optometrists and
20 ophthalmologists. And when I say readily
21 available, unlike in academic centers in the
22 community, they are very readily available, and I

1 have many patients that have come back with
2 business cards from their eyecare providers to
3 consider sending other patients to them.

4 In summary, belantamab mafodotin is an
5 effective, manageable, patient-centered therapy
6 that can be easily given in the community in both
7 rural and urban settings. That means we could be
8 able to bring an effective therapy to patients
9 where they live rather than ask patients and their
10 caregivers to travel as required for other
11 BCMA-directed standard therapies.

12 I urge you to vote in favor of the
13 benefit-risk profile of the belantamab mafodotin
14 combinations. It's an effective drug with
15 manageable and a reversible side effect profile
16 that would allow therapy to come to the patient and
17 not vice versa. And with that, I'd like to thank
18 you for your attention and for listening.

19 DR. VASAN: Thank you.

20 Speaker number 11, please unmute and turn on
21 your webcam. Please begin and introduce yourself,
22 and state your name and any organization you're

1 representing, for the record. You have
2 four minutes.

3 (No response.)

4 DR. VASAN: Speaker number 11?

5 MS. KEOGHAN: I apologize.

6 Good morning. My name is Kathleen Keoghan.
7 I'm from Alger Island. I'm age 69 and a multiple
8 myeloma patient. I have no relationship with any
9 hospital, medical facility, biomedical research
10 place, or facility of any kind or anyone who's
11 employed there, and I'm not being compensated for
12 this testimony.

13 I was diagnosed 16 years ago with kappa
14 light chain myeloma. Prior to my retirement, I
15 raised four children with my husband and worked
16 with special needs students. Upon my initial
17 diagnosis, I received radiation and my first
18 regimen of Thalomid, bortezomib, and dexamethasone.
19 Following a stem cell transplant in February of
20 2010, I went on a maintenance therapy of a daily
21 dose of Revlimid, and it was successful at keeping
22 the myeloma at bay for 12 years.

1 When I relapsed several years ago, my team
2 and I decided on a trial with a medication related
3 to Revlimid, but that trial and a subsequent one in
4 a similar vein were unsuccessful. My team then
5 suggested either CAR T-cell therapy or the trial
6 with belantamab mafodotin, bortezomib,
7 dexamethasone, and Pomalyst. The initial
8 difficulties associated with CAR T-cell
9 therapy -- the hospitalizations, et cetera -- were
10 very daunting for me, as I was caring for my
11 elderly mother.

12 The belantamab trial seemed a better fit for
13 me at the time, considering all the possible side
14 effects and the potential issues with each course
15 of treatment; and the restriction of being within
16 shouting distance of the hospital, less than
17 30 minutes away after a discharge with CAR T-cell
18 therapy, was not an option for me. The belantamab
19 trial began in August 2023, and my kappa light
20 chain numbers dropped significantly, and by late
21 September and October, my numbers had settled in to
22 3 to 4 milligrams per liter and have remained there

1 ever since.

2 The treatment never comes without a cost,
3 and with this combination of drugs -- the
4 belantamab, the bortezomib, and the dex and
5 Pomalyst -- I've experienced some slight anemia,
6 some minor fatigue, and the occasional diarrhea for
7 which I watch my diet and take Imodium as needed.
8 Also, I am impacted by the dryness, especially to
9 my cornea, which do impact my vision to a degree,
10 as they cause fuzziness depending on where the
11 patches occur. It becomes most noticeable, at
12 least to me, by the end of the first week after
13 treatment, slowly clearing over time. The dry
14 patches can be mitigated using lubricating eye
15 drops. It has not prevented me from reading, from
16 watching TV, or any of my other daily activities.

17 My ophthalmologist has found that delaying
18 treatment for one or two cycles improves the
19 situation. Foregoing belantamab for this amount of
20 time has not impacted how well this medication
21 works on my myeloma numbers, and that is very
22 impressive. I have not experienced any other side

1 effects from receiving belantamab. Infusions have
2 gone smoothly and without incident right from the
3 start.

4 It's not an easy thing to navigate treatment
5 options, but having a medical team that fully
6 includes you in all aspects of your treatment
7 program, giving you complete information in
8 layman's terms so that as a patient you can make
9 the choices that suit you best and to be supportive
10 in those choices, is priceless. I'm very thankful
11 to have such a team and to have this treatment of
12 belantamab available that is so successful for me,
13 easy to tolerate, and it allows me to live my life
14 on my terms. I'm very grateful that the FDA is
15 considering this, and I do hope they allow it to go
16 forward. Thank you so much for the opportunity to
17 share my story.

18 DR. VASAN: Thank you for your testimony.

19 Speaker number 12, please unmute yourself
20 and turn on your webcam. Will speaker number 12
21 begin and introduce yourself? Please state your
22 name and any organization you are representing, for

1 the record. You have four minutes.

2 MS. GALLEGOS: Good morning. My name is
3 Jane Gallegos. Before I tell you about my journey,
4 it's important that you know that I do not have a
5 relationship to the sponsor or competitors, and I'm
6 not being compensated in any way. The reason I
7 volunteered to speak will be made clear.

8 The year was 2019, excruciating back pain,
9 compression fractures, and a bone marrow biopsy
10 confirmed what I dreaded, multiple myeloma. Seven
11 years earlier, a blood test showing an elevated
12 M spike led me to a local oncologist; diagnosis,
13 MGUS. I followed up with the oncologist regularly
14 through those seven years. Once the myeloma
15 diagnosis was confirmed, I was given six different
16 chemo cocktails over a three-year period, along
17 with radiation treatments and a failed stem cell
18 transplant in between.

19 After the sixth chemo failed, the oncologist
20 took my hand and said, "I'm sorry, but there's
21 nothing more that I can do for you." He suggested
22 that I see a myeloma specialist, Joseph Mikhael, at

1 the Research Institute in Scottsdale. We met, and
2 I was enrolled in a trial; however, the kappa light
3 chain rose even higher. I believe it was nearing
4 15,000. I was receiving weekly blood transfusions
5 and became exceedingly weak. Dr. Mikhael and his
6 team met with me, along with my husband, and said
7 that he had one more drug to try. He explained the
8 possible side effects, including cysts on the
9 corneas. This drug was called Blenrep. He said if
10 this didn't work, I could be gone in a matter of
11 weeks.

12 I will never forget the genuine care and
13 kindness that he showed to us that day. My husband
14 began making arrangements, and I started giving
15 personal items away. We were preparing for my
16 death. The results were nothing short of
17 miraculous. The myeloma did not like this drug.
18 That was three years ago. I do get infusions of
19 Blenrep and gamma globulin from time to time as a
20 preventative measure, although there is no sign of
21 cancer in the blood work or the PET scans.

22 The cysts do cause blurred vision, but there

1 is no pain, and Christmas lighting is magnificent.
2 I do use preservative-free eye drops several times
3 a day, which helps tremendously. I can still read
4 on my iPad because I can enlarge the font. I still
5 drive. When it's difficult to see street signs
6 from a distance, I use the GPS for direction. The
7 cornea specialist I see regularly said there is no
8 permanent damage to my eyes from this drug. Are
9 the cysts annoying? Yes, but the trade-off is
10 worth it. I am still here enjoying the second
11 chance of life that I have been given. Thank you.

12 DR. VASAN: Thank you.

13 Speaker number 13, please step up to the
14 podium and introduce yourself. Please state your
15 name and any organization you are representing, for
16 the record. You have four minutes.

17 DR. ZUCKERMAN: Thank you, and can you put
18 my slides up, please?

19 Hi. I'm Dr. Diana Zuckerman. I'm president
20 of the National Center for Health Research, and
21 thanks for the opportunity to speak today. Our
22 center is a non-profit think-tank that focuses on

1 safety and effectiveness of medical products, and
2 we do not accept funding from companies that make
3 those products or have a financial interest in
4 them. My perspective is as a cancer survivor who's
5 trained in epidemiology and public health and who
6 held research positions at Yale and Harvard before
7 coming to DC to work in the U.S. Congress, HHS, the
8 White House, and as president of this research
9 center. On a personal and professional level, I
10 understand the importance of today's meeting, and I
11 thank you for your service.

12 To consider whether the benefits outweigh
13 the risks, it's important to think about who was
14 studied in the research. Fewer than 5 percent were
15 U.S. patients. Why is that? And I especially want
16 to thank Dr. Pazdur for his comments on that. Five
17 percent and 0 percent were black, and that's only
18 12 people. That's more important than the
19 percentage. The fact that there were so few, you
20 cannot generalize from those data. Patients over
21 75 were also very underrepresented, much fewer than
22 half of the percentage that's typical and, again,

1 too few to really generalize.

2 Under these circumstances, would the
3 treatment not be approved for black people or would
4 it be approved only for white people under 75? Of
5 course not. Nobody would want that.

6 There are other flaws in the study. The
7 comparator arm in DREAMM-8 is not an approved
8 regimen in the United States. There are other
9 treatments. And I want to just say I agree with
10 the FDA statement that it's a problem that half the
11 patients had only one previous treatment, so other
12 and better options might have been available to
13 them; and also just to say that the lower dosage,
14 due to poor tolerability, is also a major problem.
15 So how can FDA approve it for the dosages in the
16 indication when those weren't followed?

17 I just want to say I've attended hundreds of
18 FDA advisory committee meetings, sadly, but I've
19 never seen such a serious side effect as ocular
20 toxicity that actually affects most of the
21 patients. And blurred vision can certainly be very
22 debilitating and very risky for the people who have

1 it, and I wonder why it is that we didn't hear from
2 those patients who've been harmed today.

3 As you've heard, ocular toxicity may be
4 asymptomatic at first, and that is especially
5 dangerous because then it continues, it won't be
6 diagnosed early enough, and it may not be
7 reversible. And in the real world, of course,
8 toxicity monitoring will not be as careful as in a
9 clinical trial, and for those same patients that
10 may not have access to CAR T, they may not have
11 access to the kind of monitoring that they would
12 need for that.

13 In conclusion, although this drug has
14 benefits, are they enough to outweigh the risks?
15 The primary endpoint has been met, but it's
16 compared to an unapproved treatment in DREAMM-8 and
17 not to optimal treatments in DREAMM-7. Overall
18 survival is an unknown, really. We only have one
19 study, and given all these risks; and the small
20 number of U.S. patients; and the
21 underrepresentation of Blacks and older patients;
22 and the fact that other effective treatment options

1 are available, can patients be adequately informed
2 of benefits and risks if this treatment is
3 approved, especially given that the data are
4 primarily based on one study? Thank you very much.

5 DR. VASAN: Thank you.

6 Speaker number 14, please unmute yourself
7 and turn on your webcam. Please introduce yourself
8 and state your name and any organization you are
9 representing, for the record. You have
10 four minutes.

11 (No response.)

12 DR. VASAN: Speaker number 14?

13 (No response.)

14 DR. VASAN: Speaker number 14, are you
15 there?

16 (No response.)

17 DR. VASAN: Can you unmute yourself, please?

18 MR. CACCIOPPOLI: Yes. Can you hear me?

19 DR. VASAN: Yes.

20 MR. CACCIOPPOLI: I am a patient. I have no
21 conflict of interest. My name is Frank --

22 DR. VASAN: Sorry. Can you please state

1 your name, for the record?

2 MR. CACCIOPPOLI: My name is Frank
3 Caccioppoli. Good morning. I am here today not
4 just as a patient, but as someone whose life was
5 saved by Blenrep. I'm speaking to you as a living
6 example of how crucial this treatment is, not just
7 for me, but for many others like me fighting
8 multiple myeloma.

9 I've been battling this cancer for over five
10 years when Blenrep was introduced to me. I had
11 already been through chemotherapy and two stem cell
12 transplants. I was running out of options. My
13 doctors asked me if I wanted to try this new
14 treatment that had been just approved by the FDA.
15 I said yes. I didn't have many choices left. At
16 the time, I was told it might work or might not,
17 but I was willing to take the risk, even knowing it
18 could affect my eyes, which is dryness and blurred
19 vision, which I can handle. I was one of the first
20 patients to receive Blenrep. I felt like a guinea
21 pig, so to speak, back in 2020, and here I am today
22 speaking with the panel. Let me explain just the

1 difference this treatment made in my life.

2 Before Blenrep, I was barely able to
3 function, couldn't walk, couldn't drive. I relied
4 on others for rides. I had gone through radiation;
5 I was told that it didn't respond. I might not
6 make it much longer, I was told. I was suffering
7 deeply, physically and emotionally. I had tried so
8 many treatments and nothing held my cancer down.
9 Multiple myeloma kept coming back, attacking a
10 different part of my body each time, but then came
11 Blenrep. With the grace of God and the power of
12 the treatment, something finally clicked.

13 Today, my cancer is stable. I go for PET
14 scans every 4 to 5 months, and every time they show
15 no major progression. It's under control. I have
16 an MRI every 6 months for lesions; now, it's once a
17 year. That's a drastic improvement. Yes, the
18 treatment has side effects, which I mentioned, the
19 eyes. I take steroids like dexamethasone. Yes,
20 there were tough days, but Blenrep worked, and not
21 just in numbers. It gave me my quality of life
22 back.

1 This treatment allowed me to look back and
2 see how far I've come from barely able to stand, to
3 walking again; from mentally and emotionally
4 drained, to hopeful and engaged with my life. When
5 the treatment was suspended temporarily, it was
6 terrifying, not just for me, but for many others
7 relying on it.

8 Please understand, this isn't a clinical
9 statistical report. This is my life, and others.
10 This is the life of someone who had no other
11 options and is still here today because of this
12 treatment. The science behind Blenrep matters, but
13 so does the story of those it saves. Mine is just
14 one. I ask you today, please keep this treatment
15 available for me and for others. I'm praying, and
16 I hope you will stand with patients like me and
17 others. Thank you.

18 **Questions to the Committee and Discussion**

19 DR. VASAN: Thank you.

20 The open public hearing portion of this
21 meeting has now concluded, and we will no longer
22 take comments from the audience. I think in the

1 interest of time, and no other clarifying questions
2 that have been made to attention for me, we will
3 move on.

4 The committee will now turn its attention to
5 address the task at hand, the careful consideration
6 of the data before the committee as well as the
7 public comments. We will turn to the FDA for
8 further instructions.

9 DR. GORMLEY: We wanted the committee to
10 have a discussion of the discussion question
11 regarding the dose and whether or not that's been
12 appropriately characterized for this product. So
13 we wanted you to have the discussion, and then we
14 thought it was wise to have both of the votes. And
15 then after you've voted, though there are two
16 voting questions, have the discussion together for
17 both products.

18 DR. VASAN: Thank you.

19 We will now proceed with the questions to
20 the committee and panel discussions. I would like
21 to remind public observers that while this meeting
22 is open for public observation, public attendees

1 may not participate, except at the specific request
2 of the panel. After I read each question, we will
3 pause for any questions or comments concerning its
4 wording.

5 We will proceed with our first question,
6 which is a discussion question. Discuss whether
7 appropriate dosages of belantamab mafodotin have
8 been identified for the proposed
9 relapsed/refractory population.

10 Are there any questions or comments about
11 the wording of the question?

12 (No response.)

13 DR. VASAN: Alright. We will now open the
14 question to discussion.

15 Dr. Madan?

16 DR. MADAN: Ravi Madan, National Cancer
17 Institute. I think the question of dosing is
18 difficult across any therapeutic development. I'm
19 not a multiple myeloma doctor, but I would argue
20 that probably across oncology, we have suboptimal
21 dosing, understanding, and strategies for a lot of
22 our treatments. So I think it's really the unique

1 toxicity here that adds some gravity to this
2 question.

3 I think it's easy to criticize the dosing
4 strategy, but I actually think it's not that
5 different than a lot of other dosing we have across
6 other therapeutic developments. I think it's
7 important to at least contextualize that for this
8 conversation. That's all, the end of my statement.

9 DR. VASAN: Any other comments?

10 Dr. Spratt?

11 DR. SPRATT: Thank you. Dan Spratt,
12 UH Seidman Cancer Center, Case Western Reserve
13 University. I saved these comments for here
14 because they're not really questions. If you could
15 pull up slide CO-26, and then I'll be showing
16 slide 23.

17 Effectively, they showed in two trials, you
18 pick the median PFS somewhere around 33 to
19 36 months. That's what's in slide 26, as you guys
20 can see here with the experimental arms. Then if
21 you just go back to CO-23, just back a few slides,
22 this is from the applicant, so I'll say this is

1 favorable. I'm not pulling up the FDA's analysis,
2 but if you look here, obviously, we're not seeing
3 anywhere near 48 months. We're not seeing, really,
4 even 38 months. You're seeing somewhere between
5 what would be the Q8 dosing and Q6 dosing, what was
6 observed. So this is really what patients were
7 able to even tolerate.

8 I don't know if you're able to pull up from
9 the briefing document table 29 from the FDA. It's
10 a big table. But when I look at this, again,
11 knowing there were not enough patients in these
12 dosing studies, it seems to me, again knowing these
13 are variable endpoints and limited sample size,
14 that you get about 90 percent of the benefit if you
15 go to a dose of 1.9 Q6 to Q8 weeks, or maybe the
16 2.5 at a longer interval, while halving, cutting in
17 half, the grade 3-4 ocular events.

18 So it is troubling because there's no
19 question, hearing from the patients, seeing the
20 data, that there is clear benefit or efficacy of
21 this therapy. But at the same token, if you could
22 cut that toxicity by a meaningful amount, the

1 patients that just spoke, maybe they wouldn't have
2 to do all the things they're doing and not being
3 able to see street signs.

4 This is the table here. It is a little
5 troubling. Again, the enrollment is the
6 enrollment, but it is really disappointing. And I
7 think the fact we're still allowing drugs to gain
8 approval with less than 5 percent U.S. enrollment
9 just because that's what it is, I think if it was
10 mandated, I think you'd find that enrollment to be
11 different.

12 I just don't know. I tried finding anywhere
13 in these documents black patients. There is a
14 higher incidence of diabetes. Patients with
15 diabetes were allowed on this trial. Is there any
16 crosstalk in complications? Again, there just
17 won't be enough patients to analyze any of these
18 things, so there are just major limitations. But I
19 believe the drug is efficacious. I don't believe
20 the dose they chose is the optimal dose based on
21 the data we have. Thank you.

22 DR. VASAN: Thank you.

1 I'll make a comment piggybacking on
2 Dr. Spratt. The word of this discussion question
3 is discuss whether appropriate dosages have been
4 identified, and I think that they have been. It's
5 just that it was in these earlier phase trials. It
6 was in ALGONQUIN. It was testing these fewer
7 frequencies. And I think that in some ways it's
8 borne out in the trial design even because DREAMM-8
9 allowed for this 2.5 starting dose, then going down
10 to 1.9 . It's almost baked into these clinical
11 decisions and the strategies that GSK would have
12 decided when conceptualizing these trials.

13 So I just think this was a real missed
14 opportunity because there could have been more dose
15 exploration in those early phase trials, or there
16 could have even been a third arm added to one of
17 these trials looking at lower dosages; and,
18 certainly, that approach we have seen in many
19 clinical trials across all cancer types, where AEs
20 are an issue.

21 I agree that I don't know what to make of
22 the fact that we have this very, very low

1 population of American patients. As one of the
2 audience members pointed out, that could trickle
3 down into the fact that maybe this patient
4 population, if there were more American patients,
5 there would have been more older patients, there
6 would have been more black patients, there would
7 have been more patients who perhaps would have
8 answered those PRO questions differently about
9 driving. America's a big country. People drive.
10 So it would have skewed the patient population, I
11 think, so it makes it just very hard to interpret.

12 But I just want to reiterate, I feel this
13 was a really missed opportunity for a drug that we
14 also knew had a lot of toxicity from the earlier
15 experiences with belantamab and accelerated
16 approval. Thank you.

17 Next, Dr. Conaway?

18 DR. CONAWAY: Mark Conaway, University of
19 Virginia. In answer to the question, have
20 appropriate dosages been identified, I think yes.
21 The problem is we don't know which one. I think
22 too many doses have been perhaps identified; and I

1 think, yes, there is some missed opportunity here
2 for having explored doses that may have given very
3 similar efficacy at a lower adverse event rate.

4 I think it's really difficult to evaluate
5 the dosages given that it's such a moving target.
6 And I appreciate that that's done often in the
7 clinical setting, that doses are adjusted, but from
8 a policy, or for evaluating a drug, it's very
9 difficult to know what the appropriate dose is when
10 it seems like every patient gets a different
11 regimen of doses.

12 DR. VASAN: Thank you.

13 Dr. Frenkl?

14 DR. FRENKL: I guess my comment is that I
15 agree with Dr. Madan that I think that this program
16 is kind of very typical, if not even a little bit
17 more expansive in that there are -- I think they
18 mentioned -- 400 patients that were included in
19 this. For me, it also depends on whether you're
20 looking at the very good PR and above, which the
21 meta-analyses, and we heard from our expert, have
22 shown is actually more predictive of PFS and OS

1 than ORR. So if we believe that, I think that the
2 data that was presented actually clearly shows that
3 the higher dosing is needed to achieve those rates.

4 So, for me, there's less of a question with
5 that. And I think most of the patients in the
6 study did get the higher dose in that first cycle,
7 so even the simulations can't really predict what
8 would happen without that. So what was that impact
9 of that higher dose, which, again, to me, in these
10 dose-ranging studies, is pretty clear.

11 DR. VASAN: Thank you.

12 Dr. Nowakowski?

13 DR. NOWAKOWSKI: Thank you. I think putting
14 this question in a context of efficacy and
15 applicability to the U.S. population is also very
16 important, which was already brought here several
17 times. I understand there was no biological,
18 maybe, differences between ethnic origins, but
19 nevertheless, there are differences in geographical
20 access to different therapies where the study was
21 conducted and, unfortunately, DREAMM-7 and 8 do not
22 have significant enough U.S. representation to

1 conclude in this regard.

2 Now, the second issue is obviously toxicity,
3 and if you have toxicity like this, you really have
4 two ways to mitigate this. One is to better
5 optimize upfront, and this looks to me like a
6 missed opportunity here, or mitigate with
7 subsequent dose interruptions and dose reductions
8 with careful ophthalmological follow-up, which was
9 applied here in a drug development program. The
10 problem with the second approach, it does require
11 significant monitoring, and it does result in
12 potentially higher toxicity than normally would be
13 expected if a better optimization was done upfront.

14 I think the theme, which we've heard here
15 from several speakers, including key opinion
16 leaders, was that this is the therapy which
17 potentially would be able to cross the boundaries
18 to more a community rather than being reserved to
19 their tertiary centers, but those are exactly the
20 same patients in the rural areas and the community
21 which actually do struggle with access to careful
22 ophthalmological examination. In fact, one of our

1 problems in my current role as deputy for clinical
2 research is to provide patients on clinical trials
3 access to those timely ophthalmological
4 examinations, and in the community, we're trying to
5 decentralize some of those trials. That basically
6 provides an additional level of complexity for
7 monitoring those patients in real time and try to
8 mitigate with the dose reductions and
9 interruptions.

10 I guess my underlying question here, and
11 maybe Dr. Boyd could comment on that, is I'm trying
12 to think about the worst-case scenario, and if
13 somebody doesn't have access to ophthalmological
14 care on a routine basis, or some of those
15 appointments aren't kept for different reasons,
16 what would happen with the natural history of
17 those? If this was not caught early on by
18 ophthalmological examination and the vision had
19 worsened, how reversible would it be in the long
20 term? And I know we may not be in a position to
21 answer it because there's no significant data, but
22 I'm curious about natural history without

1 interruption.

2 DR. BOYD: This is Bill Boyd from the FDA.
3 Speaking in a really general sense, you're looking
4 at this progression of the corneal cysts and their
5 confluence, et cetera. If you had a patient who
6 was not evaluated by an eyecare professional but
7 somehow they continued to get medication,
8 presumably that could worsen to the point that they
9 could develop a denuding of the epithelium and
10 possibly a corneal ulcer and perforation.

11 The situation that's been set up where the
12 dosing should be managed by the ophthalmic
13 evaluation should prevent that, but I know in the
14 real world that's difficult. You're looking at a
15 situation like that, that, also, by the time you
16 reach that point, I presume that patient would be
17 symptomatic, and they are more likely to seek care.
18 But that's the type of situation you're looking at.
19 And I know that's not common and was not seen in
20 the trial, but that's the best-case scenario.

21 DR. ABDULLAH: If I could just highlight,
22 first, across both DREAMM-7 and DREAMM-8, we had

1 actually conducted more than 7500 ocular exams. We
2 also have a risk mitigation strategy in place as
3 well, too, that per the label, of course, we'll
4 have prespecified ocular exams taking place before
5 each dose is administered; so again, and as
6 clinically indicated, of course, as well, too.

7 I'd actually like to call on Dr. Afshari to
8 provide some additional context to address your
9 question specifically.

10 DR. VASAN: The question is about these
11 repeated events, not about the safety that's in
12 place to monitor these events, but the natural
13 history of the repeated events themselves.

14 DR. AFSHARI: Thank you.

15 Because corneal epithelium regenerates, even
16 when we don't see these patients, they actually get
17 better on their own because often when we see them,
18 we actually don't do much. We just are grading,
19 and they are taking their artificial tears. Also,
20 just to point out, seeing these patients is
21 actually pretty simple because all we need is just
22 the very front of the eye exam. We don't need the

1 dilated exam that you and I go for on our annual
2 eye exam. It's just the quick minute of the
3 slit-lamp examination of the very front of the eye.

4 Also, your question, would repeated offense
5 to the corneal epithelium in these patients cause a
6 problem, we have not seen that repeated microcysts
7 cause a problem in these patients. As you know,
8 the data of GSK showed there was just one patient
9 that had a corneal infection. Thank you.

10 DR. VASAN: Alright.

11 Are there any other questions from the
12 advisory committee?

13 Dr. Boyd?

14 DR. BOYD: Just quickly. This is Bill Boyd.
15 I think you were asking the question of whether
16 these repeated insults build. I think the answer
17 to that, it's not clear. They're supposed to be
18 evaluated in a real-world scenario where the drug
19 is not held or stopped. I could perceive that as
20 building. The cornea does regenerate, but if you
21 have continued damage without the opportunity to
22 resolve, I can see that leading to problems.

1 DR. NOWAKOWSKI: That's exactly the
2 scenario. So without examination and early
3 stopping, what would happen with repeated exposure?
4 Thank you.

5 DR. AFSHARI: May I make a --

6 DR. VASAN: I think we've answered the
7 question.

8 Dr. Spratt?

9 DR. SPRATT: Thank you. Dan Spratt.

10 UH Seidman, Case Western. I don't know if it's so
11 much as a disagreement with what Dr. Frenkl said,
12 but I guess the question is, is this really normal,
13 what she and Dr. Madan said? Again, I'm not a
14 myeloma expert, but looking across different drug
15 approvals in this space, from the monoclonal
16 antibodies to proteasome inhibitors, et cetera,
17 what I'm seeing here is 13, 25, 30 percent dose
18 interruptions or dose skipping. We're talking
19 70-80 percent, and this drug regimen that we're
20 discussing today, we're talking double, triple,
21 quadruple, and it's very early on.

22 So I guess from people on the panel -- and I

1 apologize that I don't have your name right in
2 front of me, the invited experts,
3 Dr. Nowakowski -- how common is this that you guys
4 are seeing with these drugs and classes in general
5 so early on? This seems like an outlier to me, or
6 is this not?

7 DR. NOWAKOWSKI: Yes. I think from my own
8 experience with hematological malignancies, we
9 frequently see some of those interruptions with
10 regimens, probably not to the degree which we had
11 seen in this study. And I think the key difference
12 is the severity and potential for toxicity,
13 typically interruptions which we see are due to
14 reversible hematological toxicities or some other
15 toxicities, not necessarily the ocular toxicity
16 which we had seen here. So this is a new element
17 which we see with antibody drug conjugates in
18 general, but particularly in this situation,
19 myeloma, in a very high frequency.

20 I don't know if the FDA -- again, looking at
21 the other FDA-approved regimens in this space -- if
22 you guys can put this in context for us; and it

1 goes to the question we have here.

2 DR. KANAPURU: Yes. Bindu Kanapuru from the
3 FDA. This is a very high rate of dose
4 modifications that we are seeing with this
5 particular application. So yes, this is definitely
6 higher than what we have generally seen.

7 But I also just wanted to point out that we
8 are not always beholden to what we did in the past,
9 and I think, really, here, there's been a lot more
10 interest in having adequate dose optimization.
11 Again, this development has been ongoing for a long
12 time. They've been informed repeatedly that dose
13 optimization and having an adequate dose, and risk
14 of ocular toxicity. I do agree with most of what
15 the panel members say, that this is truly a missed
16 opportunity. We don't have adequate information to
17 say that a lower dose would not be equally
18 efficacious and that there would be a better safety
19 profile. So I think this is really setting us back
20 by multiple years, and we should try to move
21 forward. Thanks.

22 DR. VASAN: Dr. Madan?

1 DR. SPRATT: Real quick.

2 DR. VASAN: I'm sorry, Dr. Spratt. I cut
3 you off.

4 DR. SPRATT: Yes. So what is the reason
5 that was given? I guess, really, we're focused to
6 the FDA. To the FDA, what is the reason that was
7 given when you recommended further dose finding and
8 they chose to just proceed with the dose? What was
9 the reason they gave you?

10 DR. GORMLEY: This is Nicole Gormley. I
11 think it was clearly highlighted in Dr. Baines'
12 presentation that multiple times the dosing was
13 brought up. And oftentimes, there was discussion
14 regarding many of the principles outlined by the
15 sponsor here today, that there's greater efficacy
16 when you initially dose, and we don't want to lose
17 that efficacy. And we wholeheartedly understand
18 and appreciate that there is a balance of
19 maintaining efficacy, but trying to improve
20 tolerability.

21 I think the issue was just that there was
22 not exploration done at lower doses. Even before,

1 and going back many years, like to 2019, when for
2 these studies it was recommended explicitly that
3 you should evaluate more patients at the lower
4 cohorts because there's not confidence in the dose,
5 and it just wasn't done.

6 DR. VASAN: Yes. Could GSK please respond?

7 DR. SPRATT: Thank you.

8 DR. ABDULLAH: Dr. Spratt, I would say that
9 we explored all of these different doses and
10 schedules, for a reason, across 400 patients.
11 We've done a randomized study, the DREAMM-14 study,
12 which was a postmarketing commitment, with
13 40 patients per arm exploring different doses and
14 different schedules. So I think we've actually,
15 certainly, continued to listen to the FDA feedback
16 and input, taking them on board, and conducted the
17 appropriate, at least, dose exploration work.

18 As you probably saw from our analyses,
19 certainly, like I said, exposure-response, we see a
20 steeper curve with the exposure-response analyses
21 relative to key ocular parameters and exposure
22 safety. And you need that depth of response to

1 decrease the disease burden initially, and then the
2 dose modifications begin, and then you're able to
3 stretch out the schedule and decrease the dose as
4 well.

5 I'd actually like to just call on Dr. Paul
6 Richardson to also contextualize the rate of these
7 dose modifications relative to other agents in the
8 multiple myeloma space, given his expertise in this
9 area.

10 DR. VASAN: I'm sorry. The question was
11 about -- was your question answered already,
12 Dr. Spratt?

13 DR. SPRATT: Yes. I didn't actually ask the
14 applicant a question. Thank you so much. I really
15 appreciate it. That's helpful.

16 DR. VASAN: Thank you.

17 Dr. Madan?

18 DR. MADAN: Just for discussion purposes, I
19 would say that it's probably hard to compare this
20 toxicity profile to other drugs, even in the
21 myeloma space, but even in the oncology clinic. I
22 know ADCs are coming on board and we're seeing this

1 more, but certainly it sounds like in the myeloma
2 space, this is pretty unique toxicity, the ocular
3 findings. People coming with vision changes,
4 you're probably more apt to react than if they have
5 nausea, which every patient probably,
6 unfortunately, has to some degree.

7 So the thresholds for discontinuation and
8 dose modification might be a little different.
9 Again, it's not a perfect understanding of all this
10 stuff, but I do think that we're kind of in a new
11 frontier with this toxicity, and it's probably
12 impacted some of the data we're viewing today.

13 DR. VASAN: Neil Vasan. One thing to add is
14 that I think both the FDA and the applicant,
15 rightly acknowledging this is a new toxicity, at a
16 previous ODAC, Dr. Gormley used the phrase "new
17 territory." The fact that this new grading scale
18 was developed in the first place, I think this is
19 very helpful for us today. It's going to be very
20 helpful for the future for other studies with
21 belantamab. It will also be helpful for other ADCs
22 as well.

1 So I do applaud, from a very broad
2 macroscopic view, this approach where when a new
3 toxicity at this degree is identified, that
4 everyone is seeking to characterize it in the most
5 rigorous way possible.

6 Mr. DeFllice?

7 DR. DeFLICE: Yes. I think this is a new
8 class of drug with a unique toxicity. In patients
9 with very serious disease that's been through many
10 therapies, with the attention given to this
11 toxicity by the ophthalmologists, I think even now
12 on social media, ophthalmologists are commenting on
13 this drug and this therapy.

14 So I think that providing this drug for this
15 unique group of myeloma patients, like I say, it's
16 totally a new class of drug. There are side
17 effects with CAR T that have been developed and are
18 addressed, and with bispecifics, now they give
19 immunoglobulin now to people getting bispecifics.
20 So I think, likewise, with this therapy, the
21 attention to eye disease, I think that's something
22 that should just be accepted with this therapy.

1 I mean, we all know on television about eye
2 diseases. Macular degeneration, the commercials
3 are just amazing right now. There are three
4 different drugs that are advertised on TV for
5 macular degeneration, so there's a sensitivity for
6 eye disease, and there's no difficulty for getting
7 patients in if they have macular degeneration,
8 which is not a reversible disease. So I think
9 looking at this very minor detail of eye effect
10 that is reversible should not limit the use of this
11 drug that has a great potential to help so many
12 patients, as we've heard today.

13 DR. VASAN: Dr. Beringer?

14 DR. BERINGER: Yes. I just want to comment
15 that I think the risk mitigation strategy is a good
16 approach to manage adverse effects, but when it's
17 happening that almost all the patients have to go
18 through a risk mitigation strategy, it's more
19 common than what should be for a drug, where you
20 should have a clear dose-response relationship.

21 So I think it would have been beneficial to
22 have more information on the lower dosing and, in

1 particular, have some information about what the
2 concentrations are that are effective and reduce
3 risk for toxicity. It seems to be a narrow
4 therapeutic index drug.

5 DR. VASAN: Mr. DeFllice?

6 DR. DeFLICE: Yes. I was on Revlimid, and
7 we went through REMS. Every time I got my
8 prescription, I went through REMS, and I could not
9 get my prescription without going through REMS. So
10 it would be the same thing with this drug, is that
11 you'd go through REMS and qualify for your next
12 dose. So I don't think that was an issue. For
13 15 years, I had to go through and answer specific
14 questions on the computer regarding my therapy with
15 lenalidomide, so I don't see this as a hindrance
16 for the use of this drug that may be so effective.

17 DR. VASAN: Alright. Are there any other
18 comments?

19 Dr. Frenkl?

20 DR. FRENKL: I think it was, essentially,
21 just made, but it was just that we're really
22 focusing on the eye toxicity, but to take a step

1 back and put it in the context of the resolution of
2 the disease symptoms that patients had, it will be
3 really important.

4 DR. VASAN: So I will sum up this
5 discussion. I think there are a lot of points of
6 view that have been brought up in this discussion.
7 I think, clearly, this is a very active compound
8 and, clearly, it is an effective compound from
9 the clinical trial data. But balanced with that is
10 this extremely high toxicity signal, a unique
11 toxicity that we're still grappling with how to
12 view it. Do we view it in the same way as other
13 toxicities? There's a new grading system that was
14 developed. As Dr. Frenkl and Dr. Madan pointed
15 out, is this sort of par for the course for what we
16 see with other drugs or other ADCs?

17 There was acknowledgement that this really
18 was a missed opportunity -- I think at multiple
19 levels -- from conversations years back when this
20 drug was first developed; a missed opportunity from
21 the initial phase 1 data to explore all dosages; a
22 missed opportunity at the phase 3 level to perhaps

1 explore more dosages at the RCT level.

2 There was some discussion about real-world
3 tolerability and how this would deploy in the real
4 world. On one hand, we have some acknowledgement
5 that there are different toxicities with
6 CAR T cells and with other products in the space,
7 but those risks really face rural patients in
8 similar ways perhaps with this drug, where you
9 would need a much more regimented ophthalmologic
10 follow-up, which may or may not be accessible by
11 everyone in this country. That was also balanced
12 by the fact that there were a very, very small
13 number of North American patients enrolled in this
14 trial. So I think we've heard a lot of differing
15 interpretations as well of this data, but then also
16 some shared interpretations.

17 Alright. If there are no further questions,
18 we will now move to our next question, question 2,
19 which is a voting question. The voting question,
20 is the overall benefit-risk of belantamab mafodotin
21 in combination with bortezomib and dexamethasone
22 favorable at the proposed dosage in the proposed

1 patient population?

2 Is there any question about the wording of
3 the vote?

4 (No response.)

5 DR. VASAN: Alright.

6 We will be using an electronic voting system
7 for this meeting. Once we begin the vote, the
8 buttons will start flashing and will continue to
9 flash even after you have entered your vote.
10 Please press the button firmly that corresponds to
11 your vote. If you are unsure of your vote or you
12 wish to change your vote, you may press the
13 corresponding button until the vote is closed.

14 After everyone has completed their vote, the
15 vote will be locked in. The vote will then be
16 displayed on the screen. The DFO will read the
17 vote from the screen into the record. Then we'll
18 have the second voting question, and then everyone
19 will state their name and vote into the record.

20 I'm sorry. Dr. Nowakowski, do you have a
21 question?

22 DR. NOWAKOWSKI: Yes. I'm sorry. Just a

1 quick clarifying question to FDA in the context of
2 this question.

3 Let's say in the postmarketing environment,
4 what is your ability to require additional dose
5 optimizations or conduct of the studies with
6 adequate U.S. presentation?

7 DR. GORMLEY: So that was an issue that
8 Dr. Baines tried to address in her presentation,
9 and I believe perhaps also Dr. Telaraja. Really,
10 we found that there are a lot of challenges with
11 conducting further dose optimization after
12 approval. We've even had a lot of postmarketing
13 commitments that are done for dosing, and we've had
14 a lot of postmarketing commitments that have been
15 done to improve the U.S. representation, and
16 oftentimes, there are a lot of challenges that are
17 associated with those trials in that, oftentimes,
18 there may not be the interest from centers in the
19 U.S. in participating and competition for other
20 trials that may be ongoing with other therapeutics.

21 Oftentimes, the data that we acquire in
22 those populations, it's single-arm data, so it's

1 not randomized. And it's hard to extrapolate what
2 was found with the registrational pivotal trial and
3 if that's really able to be extrapolated to the
4 single-arm data with either a U.S. population or a
5 different dose.

6 So it's really challenging to get additional
7 information on either of those issues in the
8 post-approval setting. So it's one of the main
9 reasons why we emphasize trying to get that
10 information prior to approval; not to mention,
11 additionally, if you don't have the right dose
12 upfront, you're exposing a lot of patients to an
13 incorrect dose before you would even get that
14 information, which is then hard to interpret and
15 often challenging to conduct.

16 DR. NOWAKOWSKI: And if those commitments
17 are not fulfilled for different reasons with
18 difficulties you describe, do you currently have a
19 mechanism to actually withdraw their license?

20 DR. GORMLEY: No. Those are postmarketing
21 commitments; they aren't postmarketing
22 requirements. Postmarketing requirements can be

1 issued for a product, for example, that has
2 accelerated approval and there's a postmarketing
3 requirement for a confirmatory trial to verify the
4 benefit. Those are required, and there are
5 mechanisms to ensure that those are done. Those
6 can also be done for safety findings. You can have
7 a postmarketing requirement where there's a
8 requirement to conduct the study.

9 Oftentimes, these are postmarketing
10 commitments for representation of the U.S. patient
11 population or for dosing, and those often are very
12 challenging to do, and there's no regulatory
13 authority to subsequently require them or have
14 consequences if they aren't completed.

15 DR. NOWAKOWSKI: Thank you.

16 DR. VASAN: If there are no further
17 questions or comments concerning the wording of the
18 question, we will now begin the voting process.
19 Please press the button on your microphone that
20 corresponds to your vote. You will have
21 approximately 20 seconds to vote. Please press the
22 button firmly. After you have made your selection,

1 the light may continue to flash. If you are unsure
2 of your vote or you wish to change your vote,
3 please press the corresponding button again before
4 the vote is closed.

5 (Voting.)

6 CDR BONNER: We'll have a five-minute break.
7 This is LaToya, and we'll be right back. Thank
8 you. We may be having some technical difficulties,
9 so just five minutes. The time now is 12:31. We
10 will start again at 12:36. Thank you.

11 (Whereupon, at 12:31 p.m., a recess was
12 taken, and meeting resumed at 12:36 p.m.)

13 CDR BONNER: The time is 12:36. We're going
14 to go ahead and proceed with the voting questions.
15 We're going to re-vote again for question 2. The
16 the voting box is blinking, and we can go ahead and
17 place your vote. Thank you.

18 DR. SPRATT: Can you confirm you have my
19 vote -- this is Dr. Spratt -- or do I need to email
20 you?

21 CDR BONNER: Yes, Dr. Spratt. I have your
22 vote, and I sent you a quick e-mail, too.

1 DR. SPRATT: Thank you.

2 CDR BONNER: Alright. Thank you.

3 (Voting.)

4 CDR BONNER: LaToya Bonner. For the record,
5 for vote question number 2, we have 3 yeses,
6 5 noes, 0 abstain.

7 We'll go to the next voting question.

8 DR. VASAN: Question 3, is the overall
9 benefit-risk of belantamab mafodotin in combination
10 with pomalidomide and dexamethasone favorable at
11 the proposed dosage in the proposed patient
12 population?

13 Are there any issues with the wording of the
14 voting question?

15 (No response.)

16 DR. VASAN: Alright. Please press the
17 button on your microphone.

18 (Voting.)

19 CDR BONNER: LaToya Bonner. I'm still
20 waiting for a vote from Dr. Spratt and Gradishar,
21 if you can email me your votes, please.

22 DR. SPRATT: I have already emailed you.

1 CDR BONNER: Okay. Thank you.

2 DR. GRADISHAR: So did I.

3 CDR BONNER: LaToya Bonner again. For those

4 in the room voting, can you please vote again and

5 press a little harder? Thank you.

6 (Voting.)

7 CDR BONNER: LaToya Bonner. The voting

8 results for vote question number 3: 1 yes, 7 noes,

9 0 abstain, for the record. Thank you. I will turn

10 the floor over to the chair.

11 DR. VASAN: Now that this vote is complete,

12 we will go around the table and have everyone who

13 voted state their name, vote, and if you want to,

14 you can state the reason why you voted as you did

15 into the record.

16 Dr. Madan?

17 DR. MADAN: Sure. Ravi Madan, National

18 Cancer Institute. For question 1, with the

19 combination with bortezomib, for a terminal

20 disease, you have a PFS benefit and an overall

21 survival advantage. The regulatory question of

22 approval was not part of the scope of the question.

1 I'll leave that hard stuff to the FDA to figure
2 out. It is concerning that there are so few U.S.
3 accruals, but nonetheless, I did think that in the
4 context of the disease state, an overall survival
5 and a progression-free survival advantage, with a
6 toxicity that's noteworthy but manageable to some
7 degree, was worth, I think, the risk-benefit ratio
8 so to speak.

9 Then, simply for the pomalidomide
10 combination, it's PFS now. It's trending to OS,
11 but it's a different dosing and a different
12 combination, and it could have a different result,
13 and I think more time will tell on that from my
14 perspective. So to confirm, I voted yes on
15 question 1 but no on question 2. Thank you.

16 DR. VASAN: Thank you.

17 Neil Vasan, NYU Langone. I voted no for
18 question 2 and 3. This was a challenging decision
19 because the efficacy data were strong, but the
20 toxicity data were also very strong, and I took a
21 textualist interpretation to this question. And
22 I'd like to emphasize the words "at the proposed

1 dosage." This was, for me, what swayed the
2 decision.

3 I said this before. I really think this was
4 just a missed opportunity over the course of many
5 years of development of this drug to explore these
6 different dosages. We've heard impassioned
7 testimonials from key opinion leaders, from many in
8 the myeloma community, and many researchers as
9 well. I think all of the building blocks are here
10 to explore this question in the future from
11 patients, to researchers, to physicians. But that
12 was the rationale for why I voted no. Thank you.

13 DR. NOWAKOWSKI: Greg Nowakowski. I voted
14 yes to the first question and no to the second one.
15 This is probably one of the most difficult votes
16 I've done as a member of this committee. I think
17 on one hand, from a regulatory perspective, the
18 whole drug development program probably made all
19 the possible mistakes which could have happened,
20 including the lack of U.S. representation in the
21 pivotal studies and also the lack of the early dose
22 optimization, which could avoid a lot of the

1 toxicity discussion which you had here.

2 On the other hand, I'm also a practicing
3 hematologist, and the drug is clearly active. I
4 think in the DREAMM-7 study, in addition to PFS
5 benefit, there was some evidence of overall
6 survival benefit and clearly some activity of this
7 combination, which could be mitigated to some
8 degree, although without reservations and worries,
9 in a setting of careful ophthalmological follow-up
10 and dose reductions or interruptions.

11 I voted no to the second question because in
12 contrast to the first study, this did not
13 necessarily translate to overall survival benefit
14 as well. Also, the comparison arm would be less
15 prone now or less pertinent in a changing landscape
16 of treatment of multiple myeloma. So hence, I vote
17 no for the second question.

18 DR. DeFLICE: I actually voted yes on the
19 questions. I think they are the the wrong issues
20 to be evaluated. Based on the clinical experience
21 of the researchers and the testimonies that we've
22 heard, this is an amazing drug, for an incurable

1 disease.

2 DR. BERINGER: Paul Beringer, USC, and I
3 voted no for both questions. I think, for me, the
4 relationship between what's the optimal dose for
5 safety and efficacy still is not fully answered. I
6 acknowledge the drug has significant effects on
7 progression-free survival, and that weighs heavily.
8 But the question is asked, do we have a safe and
9 effective dose, and I think there needs to be more
10 work done to do that.

11 DR. GRADISHAR: Bill Gradishar,
12 Northwestern. I voted no times two. The rationale
13 has already been stated by other folks. I don't
14 think anybody's disputing the activity of the drug,
15 but I think, as others have said numerous times,
16 there was a missed opportunity to optimize dose
17 schedule. And I think we're subjecting patients to
18 a lot of side effects that perhaps could be
19 mitigated with a more optimal dosing. So according
20 to the letter of the question, the answer for me is
21 no times two.

22 DR. CONAWAY: Mark Conaway, University of

1 Virginia. Just echoing what other panelists have
2 said, how difficult this decision was based on the
3 apparent efficacy and compelling testimony. But in
4 the end, I voted no on both questions because of my
5 concern about the percentage enrollment in the
6 U.S., the relevance of the control groups and, of
7 course, we've all talked about the safety of this
8 drug at the proposed dose.

9 DR. VASAN: Dr. Spratt?

10 DR. SPRATT: Yes. This is Dan Spratt,
11 UH Seidman, Case Western Reserve University. I
12 voted no for both. Also, it is not my position to
13 say whether this will be approved by the FDA, so
14 I'm just voting based upon the verbiage in the
15 question. It specifically states "in the proposed
16 patient population."

17 As I've said before at this meeting, this is
18 the United States FDA, so the proposed patient
19 population is the United States patients. The
20 clinical development program enrolled almost no
21 patients in the United States, so it precludes any
22 assessment of the benefit-risk profile in the U.S.

1 There are concerns that have already been
2 raised that due to demographic representation, or
3 treatment patterns, or other demographic
4 information that are crucial to evaluate the safety
5 and efficacy, it is disappointing that we have
6 numerous internationally renowned experts that
7 spoke on behalf of GSK, from Dana-Farber, from
8 Emory, and there were people that spoke from
9 Memorial Sloan Kettering.

10 So the fact that across these institutions
11 alone, they can't enroll a few dozen patients is
12 really disappointing to be able to, hopefully, get
13 this drug optimized and available to patients in
14 the U.S.

15 DR. VASAN: Before we adjourn, are there any
16 last comments from the FDA?

17 DR. PAZDUR: Yes. I just want to echo our
18 concerns in the agency about adequate U.S.
19 enrollment in trials here; again, because if a drug
20 is so good, patients should be enrolled in the
21 United States on this. I think it's a question
22 that has haunted us in the past. We see, across

1 the board over the years, about 20 percent in all
2 international trials coming from the United States,
3 and that's not increasing. If anything, it's
4 decreasing.

5 So it's something that we're going to be
6 paying more attention to in the United States.
7 We'll have discussions with sponsors, and they will
8 be continuing on two fronts: number one, what
9 sites are being enrolled, and we want to have
10 discussions with proposed enrollments at sites;
11 and, in addition, another project that we're
12 looking at is control arms. What are the control
13 arms being used in studies to make sure that they
14 are applicable to the U.S. population?

15 Remember, pharmaceutical companies are
16 developing a drug worldwide, but also, they're
17 coming to us for consideration. And many times,
18 studies are not using adequate control arms -- and
19 I'm not referencing this study, just in
20 general -- and it really poses many problems about
21 applicability to the United States.

22 It's not just about ethnic representation;

1 it's also about the applicability to the U.S.
2 healthcare delivery system that I think is
3 important for people to understand, especially when
4 one has unique toxicities and something that hasn't
5 been worked out before, how this really applies and
6 how it would be conducted, not in major cancer
7 centers, but in rural America, in underserved
8 populations, et cetera.

9 So these are considerations that we have.
10 We really want to use this forum, really, to
11 highlight this.

12 Also, we want sponsors to really meet with
13 us to discuss their sites that they're enrolling
14 on, not only in the United States but worldwide,
15 and also the control arms that are being done
16 because we do have grave reservations about the
17 applicability of studies when you have very, very
18 small numbers of patients, almost a minuscule
19 number of patients, being enrolled in the United
20 States.

Adjournment

22 DR. VASAN: We will now adjourn the meeting.

1 Thank you all.

2 (Whereupon, at 12:54 p.m., the meeting was
3 adjourned.)

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