

**FOOD AND DRUG ADMINISTRATION**  
Center for Drug Evaluation and Research  
*Oncologic Drugs Advisory Committee*  
**QUESTIONS**  
April 12, 2011

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**sNDA 021938/S-013**  
**Sutent (sunitinib malate) capsules**

**APPLICANT: C.P. Pharmaceuticals International C.V**  
**represented by Pfizer Inc.**  
(authorized U.S. agent)

**PROPOSED INDICATION:** for the treatment of unresectable pancreatic neuroendocrine tumors (PNET)

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**Uncertainties Regarding Magnitude of PFS Effect**

- Primary endpoint was investigator-determined progression-free survival (PFS).
- After several unplanned early data looks, the Data Monitoring Committee (DMC) recommended closure after 73 PFS events (28% of the 260 planned PFS events).
- Trial's early closure was well before the pre-specified interim analysis at 130 events.
- Stopping trials prematurely for efficacy may overestimate the magnitude of the treatment effect.

**Considerations in Benefit:Risk Assessment**

- PFS analyses indicate an estimated 4.8-6.8 month improvement in median PFS compared to placebo (HR 0.32-0.43).
- Assessment of benefit:risk should take into account:
  - potential overestimation of PFS effect due to premature study termination
  - no statistically significant improvement in overall survival (OS) observed (43% events, 69% cross-over)
  - no demonstrated improvement in patient reported outcomes
  - increased risk of adverse events, including two deaths due to cardiac failure

1. **VOTE:** Is the sunitinib benefit:risk profile favorable for the treatment of patients with unresectable pancreatic neuroendocrine tumors?