

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

205433Orig1s000

STATISTICAL REVIEW(S)



U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Translational Sciences
Office of Biostatistics

STATISTICAL REVIEW AND EVALUATION

NDA # : 205433
Priority or Standard Review: Standard Review
Applicant: Pulmoflow, Inc.
Drug Product: KitabisTM (Tobramycin Inhalation Solution, USP and PARI LC[®]
Plus Reusable Nebulizer)
Dosing Regimen: 300mg/5ml BID
Indication: For the management of cystic fibrosis patients with
Pseudomonas aeruginosa
Intended Population: Ages 6 and above
Received Date: October 23, 2013
PDUFA Goal Date: August 22, 2014
Reviewer Completion Date: August 19, 2014
Biometrics Division: Division of Biometrics IV
Medical Division: Division of Anti-Infective Products (DAIP)
Documents Reviewed: NDA 205433
Statistical Reviewer: Christopher Kadoorie, Ph.D.
Concurring Reviewer: Thamban Valappil, Ph.D.
Clinical Reviewer: Shrimant Mishra, M.D., M.P.H.
Cross Discipline Team Leader: Benjamin Lorenz, M.D.
Project Manager: Fran Lesane

Background

The Applicant, Pulmoflow, Inc., has submitted a 505(b)(2) New Drug Application for KITABIS PAK[®] (tobramycin inhalation solution, 300 mg / 5 mL), a co-packaged product of the inhaled aminoglycoside antibacterial drug with the PARI LC PLUS[®] Reusable Nebulizer. The reference listed drug (RLD) for this application is TOBI[®] Inhalation Solution, NDA 50,753 held by Novartis Inc.

In this submission, the Applicant has also included the proposed labeling for Kitabis Pak based on an outdated TOBI label. Therefore, the review team has made significant revisions to the proposed label to be in accordance with current Physician's Labeling Rule (PLR) format and regulatory practices.

Recommendations

This application is relying on the RLD and there are no clinical studies included. From a statistical perspective, there are no issues to report. There are also no recommended edits to the proposed labeling.

Applicant's Rationale

The Applicant's rationale for the Kitabis Pak is to limit the probability that an incorrect nebulizer is used with the tobramycin inhalation solution and to improve the convenience for patients. According to the clinical reviewer, Dr. Mishra, no significant new risk has been introduced with the co-package. The associated risks and benefits of this co-package are marginal compared to the individual components themselves.

Comparison between Generic Drug and the RLD

The tobramycin inhalation solution included with the Kitabis Pak is quantitatively equivalent to TOBI (i.e. contains the same NaCl content, pH and osmolality) and has equivalent droplet size distribution and emitted dose when using the PARI LC Plus nebulizer and DeVilbiss[®] PulmoAide[®] compressor in accordance with the labeled instructions for use.

Summary

In the absence of clinical data in this submission, there were no statistical issues to report. The decision on this application is deferred to other disciplines.

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/s/

CHRISTOPHER E KADOORIE
08/20/2014

THAMBAN I VALAPPIL
08/20/2014