

**CENTER FOR DRUG EVALUATION AND  
RESEARCH**

*APPLICATION NUMBER:*

**22279Orig1s000**

**PROPRIETARY NAME REVIEW(S)**

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**PROPRIETARY NAME REVIEW**

Division of Medication Error Prevention and Analysis (DMEPA)  
Office of Medication Error Prevention and Risk Management (OMEPRM)  
Office of Surveillance and Epidemiology (OSE)  
Center for Drug Evaluation and Research (CDER)

**\*\*\* This document contains proprietary information that cannot be released to the public\*\*\***

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<b>Date of This Review:</b>	February 27, 2015
<b>Application Type and Number:</b>	NDA 22279
<b>Product Name and Strength:</b>	Hycofenix (hydrocodone bitartrate, pseudoephedrine hydrochloride, and guaifenesin) Oral Solution 2.5 mg/30 mg/200 mg per 5 mL
<b>Product Type:</b>	Multi-Ingredient Product
<b>Rx or OTC:</b>	Rx
<b>Applicant/Sponsor Name:</b>	Mikart
<b>Submission Date:</b>	December 4, 2014
<b>Panorama #:</b>	2014-45368
<b>DMEPA Primary Reviewer:</b>	Matthew Barlow, RN, BSN
<b>DMEPA Team Leader:</b>	Kendra Worthy, PharmD
<b>DMEPA Associate Director:</b>	Lubna Merchant, PharmD, M.S.

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## 1 INTRODUCTION

This review evaluates the proposed proprietary name, Hycufenix, from a safety and misbranding perspective. The sources and methods used to evaluate the proposed name are outlined in the reference section and Appendix A respectively. The Applicant submitted an external name study, conducted by (b) (4) for this product.

### 1.1 REGULATORY HISTORY

The sponsor previously submitted the proposed proprietary name, Hycufenix on March 9, 2012. The Division of Medication Error Prevention and Analysis (DMEPA) found the name, Hycufenix conditionally acceptable in OSE Review #2012-613, dated September 5, 2012.

### 1.2 PRODUCT INFORMATION

The following product information is provided in the December 4, 2014 proprietary name submission.

- Intended Pronunciation:
- Active Ingredient: Hydrocodone Bitartrate, Pseudoephedrine Hydrochloride, and Guaifenesin
- Indication of Use: The symptomatic relief of cough (b) (4) nasal congestion, and to (b) (4) loosen (b) (4) mucus (b) (4)
- Route of Administration: Oral
- Dosage Form: Oral Solution
- Strength: 2.5 mg/30 mg/200 mg PER 5 mL
- Dose and Frequency: **Adults** (b) (4) (10 mL) every 4 hours, not to exceed 4 doses in 24 hours. (b) (4)
- How Supplied: supplied as a clear, violet-colored, black raspberry-flavored solution, available in 16 fl. Oz. (473 mL) bottles.
- Storage: (b) (4) Store at 20°C to 25°C (68° to 77°F). [See USP Controlled Room Temperature.]
- Container and Closure Systems: See How Supplied. Dispense in a tight, light-resistant container, as defined in the USP, with a child-resistant closure (b) (4)

## 2 RESULTS

The following sections provide information obtained and considered in the overall evaluation of the proposed proprietary name.

### 2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that the proposed name would not misbrand the proposed product. DMEPA and the Division of Pulmonary, Allergy, and Rheumatology Products (DPARP) concurred with the findings of OPDP's assessment of the proposed name.

### 2.2 SAFETY ASSESSMENT

The following aspects were considered in the safety evaluation of the name.

#### 2.2.1 *United States Adopted Names (USAN) Search*

There is no USAN stem present in the proprietary name<sup>1</sup>.

#### 2.2.2 *Components of the Proposed Proprietary Name*

The Applicant did not provide a derivation or intended meaning for the proposed name, Hycofenix in their submission. This proprietary name is comprised of a single word that does not contain any components (i.e. a modifier, route of administration, dosage form, etc.) that are misleading or can contribute to medication error.

#### 2.2.4 *FDA Name Simulation Studies*

85 practitioners participated in DMEPA's prescription studies. The responses did not overlap with any currently marketed products nor did the responses sound or look similar to any currently marketed products or any products in the pipeline. Appendix B contains the results from the verbal and written prescription studies.

#### 2.2.5 *Comments from Other Review Disciplines at Initial Review*

In response to the OSE, January 8, 2015 e-mail, the Division of Pulmonary, Allergy, and Rheumatology (DPARP) did not forward any comments or concerns relating to the proposed proprietary name at the initial phase of the review.

#### 2.2.6 *Phonetic and Orthographic Computer Analysis (POCA) Search Results*

Table 1 lists the number of names with the combined orthographic and phonetic score of  $\geq 50\%$  retrieved from our POCA search<sup>2</sup> organized as highly similar, moderately similar or low similarity for further evaluation. Table 1 also includes names identified from the Rx Study or by (b) (4)

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<sup>1</sup>USAN stem search conducted on January 15, 2015.

<sup>2</sup> POCA search conducted on December 19, 2014.

<b>Table 1. POCA Search Results</b>	<b>Number of Names</b>
Highly similar name pair: combined match percentage score $\geq 70\%$	1
Moderately similar name pair: combined match percentage score $\geq 50\%$ to $\leq 69\%$	91
Low similarity name pair: combined match percentage score $\leq 49\%$	4

### ***2.2.7 Safety Analysis of Names with Potential Orthographic, Spelling, and Phonetic Similarities***

Our analysis of the 96 names contained in Table 1 determined that none of them will pose a risk for confusion as described in Appendices C through H.

### ***2.2.8 Communication of DMEPA's Analysis at Midpoint of Review***

DMEPA communicated our findings to the Division of Pulmonary, Allergy, and Rheumatology (DPARP) via e-mail on February 23, 2015. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the DPARP on February 27, 2015, they stated no additional concerns with the proposed proprietary name, Hycufenix.

## **3 CONCLUSIONS**

The proposed proprietary name is acceptable.

If you have further questions or need clarifications, please contact Nichelle Rashid, OSE project manager, at 301-796-3904.

### **3.1 COMMENTS TO THE APPLICANT**

We have completed our review of the proposed proprietary name, Hycufenix, and have concluded that this name is acceptable.

If any of the proposed product characteristics as stated in your December 4, 2014 submission are altered prior to approval of the marketing application, the name must be resubmitted for review.

## 4 REFERENCES

1. **USAN Stems** (<http://www.ama-assn.org/ama/pub/physician-resources/medical-science/united-states-adopted-names-council/naming-guidelines/approved-stems.page>)

USAN Stems List contains all the recognized USAN stems.

2. **Phonetic and Orthographic Computer Analysis (POCA)**

POCA is a system that FDA designed. As part of the name similarity assessment, POCA is used to evaluate proposed names via a phonetic and orthographic algorithm. The proposed proprietary name is converted into its phonemic representation before it runs through the phonetic algorithm. Likewise, an orthographic algorithm exists that operates in a similar fashion. POCA is publicly accessible.

### **Drugs@FDA**

Drugs@FDA is an FDA Web site that contains most of the drug products approved in the United States since 1939. The majority of labels, approval letters, reviews, and other information are available for drug products approved from 1998 to the present.

Drugs@FDA contains official information about FDA-approved *brand name* and *generic drugs*; *therapeutic biological products*, *prescription* and *over-the-counter* human drugs; and *discontinued drugs* (see Drugs @ FDA Glossary of Terms, available at [http://www.fda.gov/Drugs/InformationOnDrugs/ucm079436.htm#ther\\_biological](http://www.fda.gov/Drugs/InformationOnDrugs/ucm079436.htm#ther_biological)).

### **RxNorm**

RxNorm contains the names of prescription and many OTC drugs available in the United States. RxNorm includes generic and branded:

- Clinical drugs – pharmaceutical products given to (or taken by) a patient with therapeutic or diagnostic intent
- Drug packs – packs that contain multiple drugs, or drugs designed to be administered in a specified sequence

Radiopharmaceuticals, contrast media, food, dietary supplements, and medical devices, such as bandages and crutches, are all out of scope for RxNorm (<http://www.nlm.nih.gov/research/umls/rxnorm/overview.html#>).

### **Division of Medication Errors Prevention and Analysis proprietary name consultation requests**

This is a list of proposed and pending names that is generated by the Division of Medication Error Prevention and Analysis from the Access database/tracking system.

## APPENDICES

### Appendix A

FDA's Proprietary Name Risk Assessment evaluates proposed proprietary names for misbranding and safety concerns.

1. **Misbranding Assessment:** For prescription drug products, OPDP assesses the name for misbranding concerns. . For over-the-counter (OTC) drug products, the misbranding assessment of the proposed name is conducted by DNCE. OPDP or DNCE evaluates proposed proprietary names to determine if the name is false or misleading, such as by making misrepresentations with respect to safety or efficacy. For example, a fanciful proprietary name may misbrand a product by suggesting that it has some unique effectiveness or composition when it does not (21 CFR 201.10(c)(3)). OPDP or DNCE provides their opinion to DMEPA for consideration in the overall acceptability of the proposed proprietary name.
2. **Safety Assessment:** The safety assessment is conducted by DMEPA, and includes the following:
  - a. Preliminary Assessment: We consider inclusion of USAN stems or other characteristics that when incorporated into a proprietary name may cause or contribute to medication errors (i.e., dosing interval, dosage form/route of administration, medical or product name abbreviations, names that include or suggest the composition of the drug product, etc.) See prescreening checklist below in Table 2\*. DMEPA defines a medication error as any preventable event that may cause or lead to inappropriate medication use or patient harm while the medication is in the control of the health care professional, patient, or consumer.<sup>3</sup>

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<sup>3</sup> National Coordinating Council for Medication Error Reporting and Prevention.  
<http://www.nccmerp.org/aboutMedErrors.html>. Last accessed 10/11/2007.

**\*Table 2- Prescreening Checklist for Proposed Proprietary Name**

	Answer the questions in the checklist below. Affirmative answers to any of these questions indicate a potential area of concern that should be carefully evaluated as described in this guidance.
<b>Y/N</b>	<b>Is the proposed name obviously similar in spelling and pronunciation to other names?</b>
	Proprietary names should not be similar in spelling or pronunciation to proprietary names, established names, or ingredients of other products.
<b>Y/N</b>	<b>Are there medical and/or coined abbreviations in the proprietary name?</b>
	Proprietary names should not incorporate medical abbreviations (e.g., QD, BID, or others commonly used for prescription communication) or coined abbreviations that have no established meaning.
<b>Y/N</b>	<b>Are there inert or inactive ingredients referenced in the proprietary name?</b>
	Proprietary names should not incorporate any reference to an inert or inactive ingredient in a way that might create an impression that the ingredient's value is greater than its true functional role in the formulation (21 CFR 201.10(c)(4)).
<b>Y/N</b>	<b>Does the proprietary name include combinations of active ingredients?</b>
	Proprietary names of fixed combination drug products should not include or suggest the name of one or more, but not all, of its active ingredients (see 21 CFR 201.6(b)).
<b>Y/N</b>	<b>Is there a United States Adopted Name (USAN) stem in the proprietary name?</b>
	Proprietary names should not incorporate a USAN stem in the position that USAN designates for the stem.
<b>Y/N</b>	<b>Is this proprietary name used for another product that does not share at least one common active ingredient?</b>
	Drug products that do not contain at least one common active ingredient should not use the same (root) proprietary name.
<b>Y/N</b>	<b>Is this a proprietary name of a discontinued product?</b>
	Proprietary names should not use the proprietary name of a discontinued product if that discontinued drug product does not contain the same active ingredients.

- b. Phonetic and Orthographic Computer Analysis (POCA): Following the preliminary screening of the proposed proprietary name, DMEPA staff evaluates the proposed name against potentially similar names. In order to identify names with potential similarity to the proposed proprietary name, DMEPA enters the proposed proprietary name in POCA and queries the name against the following drug reference databases, Drugs@fda, CernerRxNorm, and names in the review pipeline using a 50% threshold in POCA. DMEPA reviews the combined orthographic and phonetic matches and group the names into one of the following three categories:
- Highly similar pair: combined match percentage score  $\geq 70\%$ .
  - Moderately similar pair: combined match percentage score  $\geq 50\%$  to  $\leq 69\%$ .
  - Low similarity: combined match percentage score  $\leq 49\%$ .

Using the criteria outlined in the check list (Table 3-5) that corresponds to each of the three categories (highly similar pair, moderately similar pair, and low similarity), DMEPA evaluates the name pairs to determine the acceptability or non-acceptability of a proposed proprietary name. The intent of these checklists is to increase the transparency and predictability of the safety determination of whether a proposed name is vulnerable to confusion from a look-alike or sound-alike perspective. Each bullet below corresponds to the name similarity category cross-references the respective table that addresses criteria that DMEPA uses to determine whether a name presents a safety concern from a look-alike or sound-alike perspective.

- For highly similar names, differences in product characteristics often cannot mitigate the risk of a medication error, including product differences such as strength and dose. Thus, proposed proprietary names that have a combined score of  $\geq 70$  percent are at risk for a look-alike sound-alike confusion which is an area of concern (See Table 3).
- Moderately similar names with overlapping or similar strengths or doses represent an area for concern for FDA. The dosage and strength information is often located in close proximity to the drug name itself on prescriptions and medication orders, and it can be an important factor that either increases or decreases the potential for confusion between similarly named drug pairs. The ability of other product characteristics to mitigate confusion (e.g., route, frequency, dosage form, etc.) may be limited when the strength or dose overlaps. We review such names further, to determine whether sufficient differences exist to prevent confusion. (See Table 4).
- Names with low similarity that have no overlap or similarity in strength and dose are generally acceptable (See Table 5) unless there are data to suggest that the name might be vulnerable to confusion (e.g., prescription simulation study suggests that the name is likely to be misinterpreted as a marketed product). In these instances, we would reassign a low similarity name to the moderate similarity category and review according to the moderately similar name pair checklist.

- c. FDA Prescription Simulation Studies: DMEPA staff also conducts a prescription simulation studies using FDA health care professionals.

Three separate studies are conducted within the Centers of the FDA for the proposed proprietary name to determine the degree of confusion of the proposed proprietary name with marketed U.S. drug names (proprietary and established) due to similarity in visual appearance with handwritten prescriptions or verbal pronunciation of the drug name. The studies employ healthcare professionals (pharmacists, physicians, and nurses), and attempts to simulate the prescription ordering process. The primary Safety Evaluator uses the results to identify orthographic or phonetic vulnerability of the proposed name to be misinterpreted by healthcare practitioners.

In order to evaluate the potential for misinterpretation of the proposed proprietary name in handwriting and verbal communication of the name, inpatient medication orders and/or outpatient prescriptions are written, each consisting of a combination of marketed and unapproved drug products, including the proposed name. These orders are optically scanned and one prescription is delivered to a random sample of participating health professionals via e-mail. In addition, a verbal prescription is recorded on voice mail. The voice mail messages are then sent to a random sample of the participating health professionals for their interpretations and review. After receiving either the written or verbal prescription orders, the participants record their interpretations of the orders which are recorded electronically.

- d. Comments from Other Review Disciplines: DMEPA requests the Office of New Drugs (OND) and/or Office of Generic Drugs (OGD), ONDQA or OBP for their comments or concerns with the proposed proprietary name, ask for any clinical issues that may impact the DMEPA review during the initial phase of the name review. Additionally, when applicable, at the same time DMEPA requests concurrence/non-concurrence with OPDP's decision on the name. The primary Safety Evaluator addresses any comments or concerns in the safety evaluator's assessment.

The OND/OGD Regulatory Division is contacted a second time following our analysis of the proposed proprietary name. At this point, DMEPA conveys their decision to accept or reject the name. The OND or OGD Regulatory Division is requested to provide any further information that might inform DMEPA's final decision on the proposed name.

Additionally, other review disciplines opinions such as ONDQA or OBP may be considered depending on the proposed proprietary name.

When provided, DMEPA considers external proprietary name studies conducted by or for the Applicant/Sponsor and incorporates the findings of these studies into the overall risk assessment.

The DMEPA primary reviewer assigned to evaluate the proposed proprietary name is responsible for considering the collective findings, and provides an overall risk assessment of the proposed proprietary name.

**Table 3. Highly Similar Name Pair Checklist (i.e., combined Orthographic and Phonetic score is  $\geq 70\%$ ).**

<u>Orthographic Checklist</u>		<u>Phonetic Checklist</u>	
<b>Y/N</b>	Do the names begin with different first letters? <i>Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.</i>	<b>Y/N</b>	Do the names have different number of syllables?
<b>Y/N</b>	Are the lengths of the names dissimilar* when scripted?  <i>*FDA considers the length of names different if the names differ by two or more letters.</i>	<b>Y/N</b>	Do the names have different syllabic stresses?
<b>Y/N</b>	Considering variations in scripting of some letters (such as <i>z</i> and <i>f</i> ), is there a different number or placement of upstroke/downstroke letters present in the names?	<b>Y/N</b>	Do the syllables have different phonologic processes, such as vowel reduction, assimilation, or deletion?
<b>Y/N</b>	Is there different number or placement of cross-stroke or dotted letters present in the names?	<b>Y/N</b>	Across a range of dialects, are the names consistently pronounced differently?
<b>Y/N</b>	Do the infixes of the name appear dissimilar when scripted?		
<b>Y/N</b>	Do the suffixes of the names appear dissimilar when scripted?		

**Table 4: Moderately Similar Name Pair Checklist (i.e., combined score is  $\geq 50\%$  to  $\leq 69\%$ ).**

<p>Step 1</p>	<p>Review the DOSAGE AND ADMINISTRATION and HOW SUPPLIED/STORAGE AND HANDLING sections of the prescribing information (or for OTC drugs refer to the Drug Facts label) to determine if strengths and doses of the name pair overlap or are very similar. Different strengths and doses for products whose names are moderately similar may decrease the risk of confusion between the moderately similar name pairs. Name pairs that have overlapping or similar strengths or doses have a higher potential for confusion and should be evaluated further (see Step 2). Because the strength or dose could be used to express an order or prescription for a particular drug product, overlap in one or both of these components would be reason for further evaluation.</p> <p>For single strength products, also consider circumstances where the strength may not be expressed.</p> <p>For any i.e. drug products comprised of more than one active ingredient, consider whether the strength or dose may be expressed using only one of the components.</p> <p>To determine whether the strengths or doses are similar to your proposed product, consider the following list of factors that may increase confusion:</p> <ul style="list-style-type: none"> <li>○ Alternative expressions of dose: 5 mL may be listed in the prescribing information, but the dose may be expressed in metric weight (e.g., 500 mg) or in non-metric units (e.g., 1 tsp, 1 tablet/capsule). Similarly, a strength or dose of 1000 mg may be expressed, in practice, as 1 g, or vice versa.</li> <li>○ Trailing or deleting zeros: 10 mg is similar in appearance to 100 mg which may potentiate confusion between a name pair with moderate similarity.</li> <li>○ Similar sounding doses: 15 mg is similar in sound to 50 mg</li> </ul>
<p>Step 2</p>	<p>Answer the questions in the checklist below. Affirmative answers to some of these questions suggest that the pattern of orthographic or phonetic differences in the names may reduce the likelihood of confusion for moderately similar names <b><u>with</u></b> overlapping or similar strengths or doses.</p>

<p>Orthographic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> <li>• Do the names begin with different first letters?</li> </ul> <p>Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.</p> <ul style="list-style-type: none"> <li>• Are the lengths of the names dissimilar* when scripted?</li> </ul> <p>*FDA considers the length of names different if the names differ by two or more letters.</p> <ul style="list-style-type: none"> <li>• Considering variations in scripting of some letters (such as <i>z</i> and <i>f</i>), is there a different number or placement of upstroke/downstroke letters present in the names?</li> <li>• Is there different number or placement of cross-stroke or dotted letters present in the names?</li> <li>• Do the infixes of the name appear dissimilar when scripted?</li> <li>• Do the suffixes of the names appear dissimilar when scripted?</li> </ul>	<p>Phonetic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> <li>• Do the names have different number of syllables?</li> <li>• Do the names have different syllabic stresses?</li> <li>• Do the syllables have different phonologic processes, such as vowel reduction, assimilation, or deletion?</li> <li>• Across a range of dialects, are the names consistently pronounced differently?</li> </ul>
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HYCOFENIX	3	3	24	30
HYCOFINEX	0	0	1	1
HYCOPHENEX	0	8	0	8
HYCOPHENIX	0	6	0	6
HYCOPHOENIX	0	1	0	1
HYCOTHENEX	0	1	0	1
TYCOPHENEX	0	1	0	1
TYCOPHENIX	0	1	0	1
TYKOPHENEX	0	1	0	1

**Appendix C: Highly Similar Names (e.g., combined POCA score is  $\geq 70\%$ )**

No.	<b>Proposed name: Hycofenix</b> <b>Established name:</b> <b>Hydrocodone</b> <b>Bitartrate/Pseudoephedrine</b> <b>Hcl/Guaifenesin</b>  <b>Dosage form: Oral Solution</b>  <b>Strength(s): 2.5 mg/30</b> <b>mg/200 mg PER 5 mL</b>  <b>Usual Dose <sup>(b) (4)</sup> 10 mL every 4</b> <b>hours <sub>(b) (4)</sub></b>	<b>POCA</b> <b>Score (%)</b>	<b>Orthographic and/or phonetic differences in the names sufficient to prevent confusion</b>  <b>Other prevention of failure mode expected to minimize the risk of confusion between these two names.</b>
1.	Hycofenix***	100%	This name is the subject of the review.

**Appendix D: Moderately Similar Names (e.g., combined POCA score is  $\geq 50\%$  to  $\leq 69\%$ ) with no overlap or numerical similarity in Strength and/or Dose**

No.	Proposed Name	POCA Score (%)
1.	Hylenex	64%
2.	Chenix	58%
3.	Obenix	57%
4.	Propanix	54%
5.	Protonix	53%
6.	Hiberix	52%
7.	Slofenac SR	52%
8.	Atenix	52%
9.	Hypafix	62%
10.	Xopenex	56%

**Appendix E:** Moderately Similar Names (e.g., combined POCA score is  $\geq 50\%$  to  $\leq 69\%$ ) with overlap or numerical similarity in Strength and/or Dose

No.	<b>Proposed name: Hycofenix</b> <b>Established name:</b> <b>Hydrocodone</b> <b>Bitartrate/Pseudoephedrine</b> <b>Hcl/Guaifenesin</b> <b>Dosage form: Oral Solution</b> <b>Strength(s): 2.5 mg/30</b> <b>mg/200 mg PER 5 mL</b> <b>Usual Dose: <sup>(b)</sup>10 mL every 4</b> <b>hours <sub>(b) (4)</sub></b>	<b>POCA</b> <b>Score (%)</b>	<b>Prevention of Failure Mode</b>  <b>In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names</b>
1.	Cophene-X	68%	This name contains fewer syllables. The first syllable of this name pair has sufficient phonetic differences. The prefix and infix of this name pair have sufficient orthographic differences.
2.	Hycophen	64%	This name contains fewer syllables. The last syllable of this name pair has sufficient phonetic differences. The infix and suffix of this name pair have sufficient orthographic differences. Product has been discontinued since 1993, and there are no generics available.
3.	Hycofed	64%	This name contains fewer syllables. The last syllable of this name pair has sufficient phonetic differences. The suffix of this name pair has sufficient orthographic differences.
4.	Hydron EX	64%	This name contains fewer syllables. This name contains fewer letters. The second syllable of this name pair has sufficient phonetic differences. The prefix and infix of this name pair have sufficient orthographic differences.

5.	Hexabrix	62%	<p>This name contains fewer syllables.</p> <p>The first and second syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
6.	Hycos Elixir	62%	<p>This name contains more syllables.</p> <p>The third and fourth syllables of this name pair have sufficient phonetic differences.</p> <p>The infix and suffix of this name pair have sufficient orthographic differences.</p>
7.	Cyclofenil	60%	<p>The first and last syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and suffix of this name pair have sufficient orthographic differences.</p>
8.	Hydro-Cobex	60%	<p>The second and third syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and suffix of this name pair have sufficient orthographic differences.</p>
9.	Nicotinex	60%	<p>The first and third syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
10.	Hydrophene DH	58%	<p>This name contains fewer syllables.</p> <p>The second and third syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and infix of this name pair have sufficient orthographic differences.</p>
11.	Hyosphen SR	58%	<p>The second and last syllables of this name pair have sufficient phonetic differences.</p> <p>The suffix of this name pair has sufficient orthographic differences.</p>
12.	Histinex D	56%	<p>This name contains fewer syllables.</p> <p>The first and second syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
13.	Hycodan	56%	<p>This name contains fewer syllables.</p>

			<p>The last syllable of this name pair has sufficient phonetic differences.</p> <p>The suffix of this name pair has sufficient orthographic differences.</p>
14.	Hycomed	56%	<p>This name contains fewer syllables.</p> <p>The last syllable of this name pair has sufficient phonetic differences.</p> <p>The infix and suffix of this name pair have sufficient orthographic differences.</p>
15.	Rhinosyn-X	56%	<p>This name contains fewer syllables.</p> <p>The first and second syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and suffix of this name pair have sufficient orthographic differences.</p>
16.	Bromfenex	54%	<p>This name contains fewer syllables.</p> <p>The first syllable of this name pair has sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
17.	Hycolin	54%	<p>This name contains fewer syllables.</p> <p>The third and last syllables of this name pair have sufficient phonetic differences.</p> <p>The suffix of this name pair has sufficient orthographic differences.</p>
18.	Guaiifenex	54%	<p>This name contains fewer syllables.</p> <p>The first syllable of this name pair has sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
19.	Histade MX	54%	<p>This name contains fewer syllables.</p> <p>This name contains fewer letters.</p> <p>The last syllable of this name pair has sufficient phonetic differences.</p> <p>The prefix and suffix of this name pair have sufficient orthographic differences.</p>
20.	Mycocide NS	54%	<p>This name contains fewer syllables.</p>

			<p>The first and last syllables of this name pair have sufficient phonetic differences.</p> <p>The infix and suffix of this name pair have sufficient orthographic differences.</p>
21.	Hyosophen	53%	<p>The second and last syllables of this name pair have sufficient phonetic differences.</p> <p>The suffix of this name pair has sufficient orthographic differences.</p>
22.	Hytinic	53%	<p>This name contains fewer syllables.</p> <p>This name contains fewer letters.</p> <p>The second and third syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and suffix of this name pair have sufficient orthographic differences.</p>
23.	Hormofemin	52%	<p>The first and last syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
24.	Hydrofed	52%	<p>This name contains fewer syllables.</p> <p>The second and last syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and suffix of this name pair have sufficient orthographic differences.</p>
25.	Hydrogesic	52%	<p>The second and third syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and infix of this name pair have sufficient orthographic differences.</p>
26.	Hydropramox	52%	<p>The second and third syllables have sufficient phonetic differences.</p> <p>The prefix and infix of this name pair have sufficient orthographic differences.</p>
27.	Hydro-Tussin EXP	52%	<p>The third and last syllables of this name pair have sufficient phonetic differences.</p> <p>The infix of this name pair has sufficient orthographic differences.</p>
28.	Hyomax	52%	<p>This name contains fewer syllables.</p> <p>The first and second syllables of this name pair have</p>

			<p>sufficient phonetic differences.</p> <p>The prefix and infix of this name pair have sufficient orthographic differences.</p>
29.	Hytuss 2X	52%	<p>This name contains fewer syllables.</p> <p>The first and last syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
30.	Diclofenac	52%	<p>The first and second syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
31.	Hyflex	51%	<p>This name contains fewer syllables.</p> <p>The second and third syllables of this name pair have sufficient phonetic differences.</p> <p>The infix of this name pair has sufficient orthographic differences.</p>
32.	Aceclofenac	50%	<p>This name contains more syllables.</p> <p>The first and second syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and infix of this name pair have sufficient orthographic differences.</p>
33.	Cycofed	50%	<p>This name contains fewer syllables.</p> <p>The first and last syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and suffix of this name pair have sufficient orthographic differences.</p>
34.	Halotex	50%	<p>This name contains fewer syllables.</p> <p>The first and third syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and infix of this name pair have sufficient orthographic differences.</p>
35.	Histinex DM	50%	<p>This name contains fewer syllables.</p> <p>The first and second syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>

36.	Histinex HC	50%	<p>This name contains fewer syllables.</p> <p>The first and second syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
37.	Histinex PV	50%	<p>This name contains fewer syllables.</p> <p>The first and second syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix of this name pair has sufficient orthographic differences.</p>
38.	Hycomine	50%	<p>This name contains fewer syllables.</p> <p>The third and last syllables of this name pair have sufficient phonetic differences.</p> <p>The infix and suffix of this name pair have sufficient orthographic differences.</p>
39.	Hydrocod-GF	50%	<p>This name contains fewer syllables.</p> <p>The second and last syllables of this name pair have sufficient phonetic differences.</p> <p>The infix and suffix of this name pair have sufficient orthographic differences.</p>
40.	Hydrocodone CP	50%	<p>The third and last syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and infix of this name pair have sufficient orthographic differences.</p>
41.	Hydro-RX	50%	<p>This name contains fewer syllables.</p> <p>The second and last syllables of this name pair have sufficient phonetic differences.</p> <p>The prefix and suffix of this name pair have sufficient orthographic differences.</p>
42.	Hyophen	50%	<p>This name contains fewer syllables.</p> <p>The second and last syllables of this name pair have sufficient phonetic differences.</p> <p>The infix and suffix of this name pair have sufficient orthographic differences.</p>
43.	Hypotears	50%	<p>This name contains fewer syllables.</p> <p>The second and third syllables of this name pair have sufficient phonetic differences.</p>

			The infix and suffix of this name pair have sufficient orthographic differences.
44.	Proferdex	50%	This name contains fewer syllables. The first and second syllables of this name pair have sufficient phonetic differences. The prefix and suffix of this name pair have sufficient orthographic differences.
45.	Hycotuss	50%	This name contains fewer syllables. The third syllable of this name pair has sufficient phonetic differences. The suffix of this name pair has sufficient orthographic differences.

**Appendix F:** Low Similarity Names (e.g., combined POCA score is  $\leq 49\%$ )

No.	Name	POCA Score (%)
1.	H-Cort	28%
2.	Hycamtin	48%
3.	Hycoclear Tuss	47%
4.	Hytone	43%

**Appendix G:** Names not likely to be confused or not used in usual practice settings for the reasons described.

No.	Name	POCA Score (%)	Failure preventions
1.	(b) (4)***	69%	An alternate proposed proprietary name that was never submitted (OSE# 2009-1204). Another proposed proprietary name, Onmel***, was found acceptable by DMEPA (OSE# 2010-844).
2.	Hexvix***	64%	(b) (4) Alternate proposed proprietary name, Cysview***, found acceptable by DMEPA (OSE# 2010-346).
3.	Hyphanox***	62%	(b) (4) Alternate proposed proprietary name, Onmel***, found acceptable by DMEPA (OSE#2010-844).
4.	Zogenix	58%	Name of applicant for certain product. Proposed proprietary name, Zohydro ER***, found acceptable by DMEPA (OSE# 2012-1388).
5.	Hydromox	56%	Product withdrawn per FR Notice.
6.	Hooflex	52%	Product for animal use only.

7.	Metenix	51%	This is an International product.
8.	Hetacin K	50%	Product for animal use only.
9.	Hydromox R	50%	Product withdrawn per FR Notice.
10.	Idenix	50%	Name of applicant for certain product. Proposed proprietary name, Tyzeka***, found acceptable by DMEPA (OSE# 2007-669)

**Appendix H:** Names not likely to be confused due to notable spelling, orthographic and phonetic differences.

No.	Name	POCA Score (%)
1.	Actinex	53%
2.	Bromphenex	52%
3.	Calci-Mix	50%
4.	CASODEX	51%
5.	Cerumenex	52%
6.	Cognex	54%
7.	COMBUNOX	52%
8.	Conex	52%
9.	Cophene-X-P	62%
10.	Cortidex	51%
11.	cosentyx	62%
12.	Cyclodox	50%
13.	Deconex	51%
14.	Desenex	51%
15.	Dostinex	51%
16.	Dovonex	51%
17.	Infanrix	50%

18.	LOVENOX	54%
19.	Mucinex	50%
20.	Rhinoflex	52%
21.	Sominex	50%
22.	Specifix	50%
23.	Sytobex	50%
24.	Taclonex	50%
25.	Terfinax	52%
26.	Tussafed EX	50%

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/s/  
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MATTHEW J BARLOW  
02/27/2015

KENDRA C WORTHY  
02/27/2015

LUBNA A MERCHANT  
02/27/2015

**Department of Health and Human Services**  
**Public Health Service**  
**Food and Drug Administration**  
**Center for Drug Evaluation and Research**  
**Office of Surveillance and Epidemiology**

Date: December 29, 2010

Application Type/Number: NDA 022279

Through: Melina Griffis, RPh, Team Leader  
Denise P. Toyer, PharmD, Deputy Director  
Division of Medication Error Prevention and Analysis (DMEPA)

From: Lubna Merchant, M.S., Pharm.D., Safety Evaluator  
Division of Medication Error Prevention and Analysis (DMEPA)

Subject: Proprietary Name Review

Drug Name: (b) (4) (Hydrocodone-Pseudoephedrine and Guaifenesin) Oral Solution,  
2.5 mg-30 mg-200 mg per 5 mL

Applicant: (b) (4)

OSE RCM #: 2010-2239

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LUBNA A MERCHANT  
12/29/2010

MELINA N GRIFFIS  
12/29/2010

DENISE P TOYER  
12/30/2010

**Department of Health and Human Services**  
**Public Health Service**  
**Food and Drug Administration**  
**Center for Drug Evaluation and Research**  
**Office of Surveillance and Epidemiology**

Date: August 26, 2010

Application Type/Number: NDA 022279

Through: Melina Griffis RPh, Team Leader  
Division of Medication Error Prevention and Analysis (DMEPA)

From: Lubna Najam, M.S., Pharm.D, Safety Evaluator  
Division of Medication Error Prevention and Analysis (DMEPA)

Subject: Proprietary Name Review

Drug Name(s): (b) (4) (Hydrocodone, Pseudoephedrine, and Guaifenesin) Oral Solution, 2.5 mg/30 mg/200 mg/5 mL

Applicant/sponsor: (b) (4)

OSE RCM #: 2010-1691

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Application  
Type/Number

Submission  
Type/Number

Submitter Name

Product Name

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NDA-22279

-----  
ORIG-1

-----  
 (b) (4)

-----  
HYDROCODONE  
HCL/GUAIFENESIN/PSEUDOEP  
HEDR

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LUBNA NAJAM  
08/26/2010

MELINA N GRIFFIS  
08/26/2010