



BLA 125514/S-046

**SUPPLEMENT APPROVAL
FULFILLMENT OF POSTMARKETING COMMITMENT**

Merck Sharp & Dohme Corp.
Attention: Margaret E. McCann, DVM, PhD
126 E. Lincoln Avenue
P.O. Box 2000, RY34-B293
Rahway, NJ 07065-0900

Dear Dr. McCann:

Please refer to your Supplemental Biologics License Application (sBLA), dated June 29, 2018, received June 29, 2018, submitted under section 351(a) of the Public Health Service Act for Keytruda (pembrolizumab) for injection 50 mg and for Keytruda (pembrolizumab) injection 100 mg/4mL.

This Prior Approval supplemental biologics application updates the Keytruda (pembrolizumab) USPI to add language about PD-L1 testing. This supplement fulfills the postmarketing commitment (PMC) #3434-1 as stated in the June 19, 2018, approval letter.

APPROVAL & LABELING

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

WAIVER OF HIGHLIGHTS SECTION

Please note that we have previously granted a waiver of the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 601.14(b)] in structured product labeling (SPL) format, as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>, that is identical to the enclosed labeling (text for the prescribing information and text for the patient package insert.) and include the labeling changes proposed in any pending "Changes Being Effected" (CBE) supplements. Information on submitting SPL files using eLIST may be found

in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this BLA, including pending “Changes Being Effected” (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] in MS Word format that includes the changes approved in this supplemental application.

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because none of these criteria apply to your application, you are exempt from this requirement.

FULFILLMENT OF POSTMARKETING REQUIREMENT(S)/COMMITMENT(S)

With the review of this submission, we have concluded that the following commitment was fulfilled:

- 3434-1 Commitment to establish and support, through the use of prior clinical trial data, labeling of an in vitro diagnostic device PD-L1 immunohistochemistry test that is essential to the safe and effective use of pembrolizumab for PD-L1 positive patients [Combined Positive Score (CPS) \geq 10] with locally advanced or metastatic urothelial carcinoma who are not eligible for cisplatin-containing chemotherapy. Submit updated labeling based on PD-L1 testing.

We remind you that there are postmarketing requirements and postmarketing commitments that are still open.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the prescribing information to:

OPDP Regulatory Project Manager
Food and Drug Administration

Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705-1266

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at: <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf>).

As required under 21 CFR 601.12(f)(4), you must submit final promotional materials, and the prescribing information, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>. Information and Instructions for completing the form can be found at <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, call Sakar Wahby, Regulatory Project Manager, at (240) 402-5364.

Sincerely,

{See appended electronic signature page}

Julia Beaver, MD
Director
Division of Oncology Products 1
Office of Hematology and Oncology Products
Center for Drug Evaluation and Research

ENCLOSURE(S):
Content of Labeling

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

JULIA A BEAVER
08/16/2018

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