

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

208294Orig1s000

PROPRIETARY NAME REVIEW(S)

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*****

Date of This Review:	September 8, 2015
Application Type and Number:	NDA 208294
Product Name and Strength:	Bevespi Aerosphere (Glycopyrrolate and Formoterol Fumarate) Inhalation Aerosol, 9 mcg/4.8 mcg per actuation
Product Type:	Multi-Ingredient Product
Rx or OTC:	Rx
Applicant/Sponsor Name:	Pearl Therapeutics, Inc.
Panorama #:	2015-960694
DMEPA Primary Reviewer:	Lissa C. Owens, PharmD
DMEPA Team Leader:	Kendra Worthy, PharmD

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1 INTRODUCTION

This review evaluates the proposed proprietary name, Bevespi Aerosphere, 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 did not submit an external name study for this proposed proprietary name.

1.1 REGULATORY HISTORY

Under the IND, the Applicant submitted the proposed proprietary name, (b) (4) on June 27, 2014. However, the Office of Prescription Drug Promotion (OPDP) did not recommend the use of the proposed proprietary name (b) (4). DMEPA concurred with OPDP in OSE Review # 2014-25715, dated December 15, 2014.

Thus, the Applicant submitted the name, Bevespi Aerosphere, for review on July 10, 2015 under the NDA.

1.2 PRODUCT INFORMATION

The following product information is provided in the July 10, 2015 proprietary name submission.

- Intended Pronunciation: be-VES-pee AIR-oh-sfeer
- Active Ingredient: Glycopyrrolate and Formoterol Fumarate
- Indication of Use: Long-term, maintenance treatment of airflow obstruction in patients with chronic obstructive pulmonary disease (COPD)
- Route of Administration: Oral Inhalation
- Dosage Form: Inhalation Aerosol
- Strength: 9 mcg/4.8 mcg per actuation
- Dose and Frequency: 2 inhalations twice daily
- How Supplied: Pressurized aluminum canister with an attached dose indicator, a white plastic actuator and mouthpiece, and an orange dust cap
- Storage: Controlled room temperature 20°-25°C (68°-77°F); excursions permitted to 15°-30°C (59°-86°F)

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 name¹.

2.2.2 *Components of the Proposed Proprietary Name*

The Applicant did not provide a derivation or intended meaning for the proposed name, Bevespi Aerosphere in their submission. This proprietary name is comprised of a root name and a modifier.

The applicant indicated that the modifier, 'Aerosphere,' represents the device but has no intended meaning. They did not provide data to support that the proposed modifier is understood by health care practitioners and patients; however, the naming convention to use a modifier to represent a specific device has been used before (e.g Advair Diskus and Flovent Diskus). The Aerosphere device is not available on its own and we do not anticipate that the modifier 'Aerosphere' will be written on its own without the root name.

We note that modifiers may sometimes be omitted. If the modifier Aerosphere is omitted, there is no other Bevespi product currently marketed and therefore there will be no product confusion at this time. Therefore, we do not find the modifier, Aerosphere, misleading or vulnerable to confusion and find it acceptable for this product.

2.2.3 *Comments from Other Review Disciplines at Initial Review*

In response to the OSE, July 30, 2015 e-mail, the Division of Pulmonary, Allergy, and Rheumatology Products (DPARP) did not forward any comments or concerns relating to the proposed proprietary name at the initial phase of the review.

2.2.4 *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 search² organized as highly similar, moderately similar or low similarity for further evaluation.

Table 1. POCA Search Results	Number of Names
Highly similar name pair: combined match percentage score $\geq 70\%$	1
Moderately similar name pair: combined match percentage score $\geq 50\%$ to $\leq 69\%$	83

¹USAN stem search conducted on July 29, 2015.

² POCA search conducted on July 29, 2015

Low similarity name pair: combined match percentage score $\leq 49\%$	0
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2.2.5 Safety Analysis of Names with Potential Orthographic, Spelling, and Phonetic Similarities

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

2.2.6 Communication of DMEPA's Analysis at Midpoint of Review

DMEPA communicated our findings to the Division of Pulmonary, Allergy, and Rheumatology Products (DPAP) via e-mail on August 27, 2015. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the DPARP on August 28, 2015, they stated no additional concerns with the proposed proprietary name, Bevespi Aerosphere.

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, Bevespi Aerosphere, and have concluded that this name is acceptable.

If any of the proposed product characteristics as stated in your July 10, 2015 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).

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 DNDP. OPDP or DNDP 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 DNDP 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.³

³ 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.
Y/N	Is the proposed name obviously similar in spelling and pronunciation to other names?
	Proprietary names should not be similar in spelling or pronunciation to proprietary names, established names, or ingredients of other products.
Y/N	Are there medical and/or coined abbreviations in the proprietary name?
	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.
Y/N	Are there inert or inactive ingredients referenced in the proprietary name?
	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)).
Y/N	Does the proprietary name include combinations of active ingredients?
	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)).
Y/N	Is there a United States Adopted Name (USAN) stem in the proprietary name?
	Proprietary names should not incorporate a USAN stem in the position that USAN designates for the stem.
Y/N	Is this proprietary name used for another product that does not share at least one common active ingredient?
	Drug products that do not contain at least one common active ingredient should not use the same (root) proprietary name.
Y/N	Is this a proprietary name of a discontinued product?
	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 ≥ 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 $\geq 70\%$).

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 render the names less likely to confusion, provided that the pair do not share a common strength or dose.			
<u>Orthographic Checklist</u>		<u>Phonetic Checklist</u>	
Y/N	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>	Y/N	Do the names have different number of syllables?
Y/N	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>	Y/N	Do the names have different syllabic stresses?
Y/N	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?	Y/N	Do the syllables have different phonologic processes, such as vowel reduction, assimilation, or deletion?
Y/N	Is there different number or placement of cross-stroke or dotted letters present in the names?	Y/N	Across a range of dialects, are the names consistently pronounced differently?
Y/N	Do the infixes of the name appear dissimilar when scripted?		
Y/N	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"> ○ 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. ○ Trailing or deleting zeros: 10 mg is similar in appearance to 100 mg which may potentiate confusion between a name pair with moderate similarity. ○ Similar sounding doses: 15 mg is similar in sound to 50 mg
<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 <u>with</u> overlapping or similar strengths or doses.</p>

<p>Orthographic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> • Do the names begin with different first letters? <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"> • Are the lengths of the names dissimilar* when scripted? <p>*FDA considers the length of names different if the names differ by two or more letters.</p> <ul style="list-style-type: none"> • 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? • Is there different number or placement of cross-stroke or dotted letters present in the names? • Do the infixes of the name appear dissimilar when scripted? • Do the suffixes of the names appear dissimilar when scripted? 	<p>Phonetic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> • Do the names have different number of syllables? • Do the names have different syllabic stresses? • Do the syllables have different phonologic processes, such as vowel reduction, assimilation, or deletion? • Across a range of dialects, are the names consistently pronounced differently?
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Table 5: Low Similarity Name Pair Checklist (i.e., combined score is $\leq 49\%$).

In most circumstances, these names are viewed as sufficiently different to minimize confusion. Exceptions to this would occur in circumstances where, for example, there are data that suggest a name with low similarity is nonetheless misinterpreted as a marketed product name in a prescription simulation study. In such instances, FDA would reassign a low similarity name to the moderate similarity category and review according to the moderately similar name pair checklist.

Appendix B: Prescription Simulation Samples and Results

Figure 1. Bevespi Aerosphere Study (Conducted on July 24, 2015)

Handwritten Requisition Medication Order	Verbal Prescription
<p><u>Medication Order:</u></p> <p><i>Bevespi Aerosphere 2 inhalations po BID</i></p>	<p>Bevespi Aerosphere #1 UAD</p>
<p><u>Outpatient Prescription:</u></p> <p><i>Bevespi Aerosphere #1 UAD</i></p>	

Study Name: Bevespi Aerosphere

As of Date 8/17/2015

245 People Received Study
79 People Responded

Study Name: Bevespi Aerosphere

	Total	28	26	25
INTERPRETATION	OUTPATIENT	VOICE	INPATIENT	TOTAL
BAVESBI AEROSPHERE	0	1	0	1
BAVESPI AIRISPHERE	0	1	0	1
BESVYSIS ACRISPHERE	1	0	0	1
BEVASPE AIROSPHERE	0	1	0	1
BEVERSYS AEROSPHERE	1	0	0	1
BEVES[O AERISPHERE	1	0	0	1
BEVESBEE AEROSPHERE	0	1	0	1
BEVESP AERISPHERE	1	0	0	1
BEVESPE AEROSPHERE	0	1	0	1
BEVESPI	0	1	1	2
BEVESPI ACRASPHERE	0	0	1	1
BEVESPI ACROSPHERE	0	0	1	1
BEVESPI AEOSPHERE	1	0	0	1
BEVESPI AERESPHERE	1	0	0	1

BEVESPI AERISPHERE	3	1	0
BEVESPI AEROPHERE	1	0	0
BEVESPI AEROSHPERE	0	0	1
BEVESPI AEROSHPERE	1	0	0
BEVESPI AEROSPHERE	0	0	1
BEVESPI AEROSPHERE	15	5	11
BEVESPI AIRSPHERE	0	1	0
BEVESPI ARASPEAR	0	1	0
BEVESPI ARISEAR	0	1	0
BEVESPI ARISPHERE	0	1	0
BEVESPI AROSPHERE	1	0	0
BEVESPIERESPHERE	0	1	0
BEVESPY AIRESPHERE	0	1	0
BEVESYS AEROSPHERE	1	0	0
BEVISPE AERASPHERE	0	1	0
BEVISPI AEROSPHERE	0	0	5
BEVISPI AREOSPHERE	0	0	1
BEVISTE ORASPHERE	0	1	0
BIVESPI AERASPHEREE	0	0	1
BIVESPI AEROSPHERE	0	2	0
BIVESPI AIRASPHERE	0	0	1
BIVESPI AIRUSPHERE	0	1	0
BIVESPY ARISPHERE	0	1	0
BOVESPI ARISPHERE	0	1	0
VEPESPI AEROSPHERE	0	1	0
VEVISPI ACROSPHERE	0	0	1

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

No.	Proposed name: Bevespi Aerosphere Established name: Glycopyrrolate and Formoterol Fumarate Dosage form: Metered dose inhaler Strength(s): 9 mcg/4.8 mcg Usual Dose: Two inhalations twice daily	POCA Score (%)	Orthographic and/or phonetic differences in the names sufficient to prevent confusion Other prevention of failure mode expected to minimize the risk of confusion between these two names.
1.	Bevespi***	100	Part of the proposed name under review. The name 'Bevespi' was not submitted without the modifier

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.	Name	POCA Score (%)
1.	Zavesca	58
2.	Benefix	54
3.	Biavax II	54
4.	Brovex PD	54
5.	Brovex PSE	54
6.	Blisovi***	54
7.	Despec	54
8.	Bar-Test	53
9.	Beflex	53
10.	Bidhist	53
11.	Bimectin	53
12.	Bravecto	53
13.	Brovex PB	53
14.	Beeswax	52
15.	Bendectin	52
16.	Benzepril	52

No.	Name	POCA Score (%)
17.	Binosto	52
18.	Bovapro	52
19.	Brioschi	52
20.	Never Pain	52
21.	Belix	51
22.	Benlysta	51
23.	Betasept	51
24.	B-12 Resin	50
25.	Belviq XR***	50
26.	(b) (4) ***	50
27.	Bidex	50

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.	Proposed name: Bevespi Aerosphere Established name: Glycopyrrolate and Formoterol Fumarate Dosage form: Metered Dose Inhaler Strength(s): 9 mcg/4.8 mcg Usual Dose: 2 inhalations twice daily	POCA Score (%)	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names
1.	Benefiber	54	When compared to the root name, the infix and suffix of this name pair have sufficient orthographic differences When compared to the root name, Benefiber has an extra syllable
2.	Benemid	52	When compared to the root name, the suffix of this name pair have sufficient orthographic differences When compared to the root name, the second and third syllables sound different
3.	Betoptic	52	When compared to the root name, the infix and suffix of this name pair have sufficient orthographic differences When compared to the root name, the second and third syllables sound different

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

No.	Name	POCA Score (%)
1.	N/A	

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.	Bellaspas	60	Product discontinued with no generics available
2.	B-Vex PD	60	Product discontinued with no generics available
3.	Bilivist	57	Product discontinued with no generics available
4.	Biofed-PE	56	Product discontinued with no generics available
5.	Brovex PEB	55	Product discontinued with no generics available
6.	Bidex-A	54	Product discontinued with no generics available
7.	Bidex-DMI	54	Product discontinued with no generics available
8.	Biotuss PE	54	Product discontinued with no generics available
9.	Vesprin	54	Product discontinued with no generics available
10.	Beta-Escin	53	No information found in common drug references
11.	Betastat	53	No information found in common drug references
12.	Brovex	53	Product discontinued with no generics available
13.	Benerva	52	No information found in common drug references
14.	B-Vex	52	Product discontinued with no generics available
15.	B-Vex D	52	Product discontinued with no generics available
16.	Brovex SR	51	Product discontinued with no generics available

No.	Name	POCA Score (%)	Failure preventions
17.	Bendopa	50	Product discontinued with no generics available
18.	Brovex D	50	No information found in common drug references
19.	Despec-SF	50	Product discontinued with no generics available

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

No.	Name	POCA Score (%)
1.	Degest 2	63
2.	Degest	63
3.	Evista	58
4.	Mijesti	58
5.	Evovist	56
6.	Tavist-1	54
7.	Avastin	54
8.	Duresta	54
9.	Medispaz	54
10.	Menest	54
11.	Tavist	54
12.	Cenestin	53
13.	Defend II	53
14.	Dermestril 100	52
15.	Dermestril 50	52
16.	Dermestril 25	52
17.	Obestin-30	52
18.	Ferus pic-150	52
19.	Desitin	52

20.	Genestin	52
21.	Medent-PE	52
22.	Prefest	52
23.	Evamist	51
24.	Medent-PEI	51
25.	Retasqi	51
26.	Nava-SC	50
27.	Pedesil	50
28.	Perestan	50
29.	Ravicti	50
30.	Tavist-D	50
31.	Vanspar	50
32.	Viberzi	50
33.	Vivactil	50
34.	Xirez-PE	50

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LISSA C OWENS
09/08/2015

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