CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

208694Orig1s000

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:	April 20, 2017
Application Type and Number:	NDA 208694
Product Name and Strength:	Zerviate (cetirizine) ophthalmic solution, 0.24%
Product Type:	Single Ingredient
Rx or OTC:	Rx
Applicant/Sponsor Name:	Nicox Ophthalmics, Inc
Panorama #:	2017-13597069
DMEPA Primary Reviewer:	Madhuri R. Patel, PharmD
DMEPA Team Leader (Acting):	Sarah K. Vee, PharmD

Contents

1 INTRODUCTION

This review evaluates the proposed proprietary name, Zerviate, 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

The Applicant previously submitted the proposed proprietary name, Zerviate, on June 17, 2015 under IND 108558 and the Division of Medication Error Prevention and Analysis (DMEPA) found the name conditionally acceptable in OSE Review#2015-818134[a]. The Applicant re-submitted the proposed proprietary name, Zerviate, on April 26, 2016. DMEPA found the name conditionally acceptable in OSE Review #2016-7688967[b], dated June 2, 2016. However, NDA 208694 received a complete response (CR) on October 7, 2016.

The applicant responded to the CR and re-submitted the name, Zerviate, for review on March 8, 2017.

1.2 PRODUCT INFORMATION

The following product information is provided in the March 8, 2017 proprietary name submission.

- Intended Pronunciation: zer' vee ate
- Active Ingredient: cetirizine
- Indication of Use: treatment of ocular itching associated with allergic conjunctivitis
- Route of Administration: ophthalmic
- Dosage Form: ophthalmic solution
- Strength: 0.24%
- Dose and Frequency: one drop in each affected eye twice daily
- How Supplied: white low-density polyethylene multi-dose ophthalmic bottle with a low-density polyethylene dropper tip and a white polypropylene cap. 5 mL fill in a 7.5 mL bottle. 7.5 mL fill in a 10 mL bottle.
- Storage: Store at 15°C to 25°C (59°F to 77°F).
- Container and Closure Systems: n/a

2 RESULTS

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[a] Garrison N. Proprietary Name Review for Zerviate (cetirizine) IND 108558. Silver Spring (MD): FDA, CDER, OSE, DMEPA, (US); 2015 SEP 3. OSE RCM No.: 2015-818134.

[b] Rutledge M. Proprietary Name Review for Zerviate (cetirizine) NDA 208694. Silver Spring (MD): FDA, CDER, OSE, DMEPA, (US); 2016 JUN 2. OSE RCM No.: 2016-7688967

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 Transplant and Ophthalmology Products (DTOP) 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[c].

2.2.2 Components of the Proposed Proprietary Name

The Applicant indicated in their submission that the proposed name, Zerviate, is derived from **Zer** + alle**viate**. 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.

2.2.3 Comments from Other Review Disciplines at Initial Review

In response to the OSE, March 28, 2017 e-mail, the Division of Transplant and Ophthalmology Products (DTOP) did not forward any comments or concerns relating to the proposed proprietary name at the initial phase of the review.

2.2.4 FDA Name Simulation Studies

Seventy-eight (78) 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 Phonetic and Orthographic Computer Analysis (POCA) Search Results

Our POCA search[d] identified 203 names with the combined score of ≥55% or individual orthographic or phonetic score of ≥70%. We had identified and evaluated 137 names in our previous proprietary name review using a previous version of POCA[e]. We re-evaluated the previously identified names of concern considering any lessons learned from recent post-marketing experience, which may have altered our previous conclusion regarding the acceptability of the name. We note that none of the product characteristics have changed and we

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[c] USAN stem search conducted on April 5, 2017.

[d] POCA search conducted on March 31, 2017 in version 4.0.

[e] Garrison N. Proprietary Name Review for Zerviate (cetirizine) IND 108558. Silver Spring (MD): FDA, CDER, OSE, DMEPA, (US); 2015 SEP 3. OSE RCM No.: 2015-818134.

agree with the findings from our previous review for the names evaluated previously. However, we identified 1 name in POCA version 4.0 determined to be highly similar name pairs that was previously analyzed and evaluated as moderately similar name pairs based on a previous version of POCA. We also identified 71 names not previously analyzed. These names are included in Table 1 below.

2.2.6 Names with Strength Overlap and Potential Orthographic, Spelling, and Phonetic Similarities

The proposed product, Zerviate, will be available in 0.24% strength. Since this is not a typical strength that is commonly marketed, we searched the Electronic Drug Registration and Listing System (eDRLS) database to identify names with strength overlap. Names identified in the eDRLS database not likely to be confused due to notable spelling, orthographic and phonetic differences are listed in Appendix I.

2.2.7 Names Retrieved for Review Organized by Name Pair Similarity

Table 1 lists the number of names retrieved from our POCA search. These name pairs are organized as highly similar, moderately similar or low similarity for further evaluation.

Table 1. Similarity Category	**Number of Names**
Highly similar name pair: combined match percentage score ≥70%	2
Moderately similar name pair: combined match percentage score ≥55% to ≤ 69%	20
Low similarity name pair: combined match percentage score ≤54%	49

2.2.8 Safety Analysis of Names with Potential Orthographic, Spelling, and Phonetic Similarities

Our analysis of the 71 names contained in Table 1 determined 71 names will not pose a risk for confusion as described in Appendices C through H.

2.2.9 Communication of DMEPA's Analysis at Midpoint of Review

DMEPA communicated our findings to the Division of Transplant and Ophthalmology Products (DTOP) via e-mail on April 13, 2017. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the DTOP on April 14, 2017, they stated no additional concerns with the proposed proprietary name, Zerviate.

3 CONCLUSIONS

The proposed proprietary name is acceptable.

If you have any questions or need clarifications, please contact Abiola Olagundoye, OSE project manager, at 301-796-3982.

3.1 COMMENTS TO THE APPLICANT

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

If any of the proposed product characteristics as stated in your March 8, 2017 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.

3. ***Electronic Drug Registration and Listing System (eDRLS) database***

The electronic Drug Registration and Listing System (eDRLS) was established to supports the FDA's Center for Drug Evaluation and Research (CDER) goal to establish a common Structured Product Labeling (SPL) repository for all facilities that manufacture regulated drugs. The system is a reliable, up-to-date inventory of FDA-regulated, drugs and establishments that produce drugs and their associated information.

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. [f]

[f] 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 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 55% 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 ≥70%.
   - Moderately similar pair: combined match percentage score ≥55% to ≤ 69%.
   - Low similarity: combined match percentage score ≤54%.

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 are further evaluated to identify the presence of attributes that are known to cause name confusion.
    - Name attributes: We note that the beginning of the drug name plays a significant role in contributing to confusion. Additionally, drug name pairs that start with the same first letter and contain a shared letter string of at least 3 letters in both names are major contributing factor in the confusion of drug names[g]. We evaluate all moderately similar names retrieved from POCA to identify the above attributes. These names are further evaluated to identify overlapping or similar strengths or doses.
    - Product attributes: Moderately similar names of products that have overlapping or similar strengths or doses represent an area for concern for FDA. The dose and strength information is often located in close proximity to the drug name itself on prescriptions and medication orders, and the information 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.,

[g] Shah, M, Merchant, L, Characteristics That May Help in the Identification of Potentially Confusing Proprietary Drug Names. Therapeutic Innovation & Regulatory Science, September 2016

route, frequency, dosage form) may be limited when the strength or dose overlaps. DMEPA reviews 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 ≥ 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 does not share a common strength or dose.			
Orthographic Checklist		Phonetic Checklist	
Y/N	Do the names begin with different first letters? *Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.*	**Y/N**	Do the names have different number of syllables?
Y/N	Are the lengths of the names dissimilar* when scripted? **FDA considers the length of names different if the names differ by two or more letters.*	**Y/N**	Do the names have different syllabic stresses?
Y/N	Considering variations in scripting of some letters (such as *z* and *f*), 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 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 ≥55% to ≤69%).

Step 1	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. For single strength products, also consider circumstances where the strength may not be expressed. 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. To determine whether the strengths or doses are similar to your proposed product, consider the following list of factors that may increase confusion: • 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

Step 2	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 **with** overlapping or similar strengths or doses.	
	Orthographic Checklist (Y/N to each question) • Do the names begin with different first letters? Note that even when names begin with different first letters, certain letters may be confused with each other when scripted. • Are the lengths of the names dissimilar* when scripted? *FDA considers the length of names different if the names differ by two or more letters. • Considering variations in scripting of some letters (such as *z* and *f*), 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?	Phonetic Checklist (Y/N to each question) • Do the names have different number of syllables? • Do the names have different syllabic stresses? • Do the syllables have different phonologic processes, such vowel reduction, assimilation, or deletion? • Across a range of dialects, are the names consistently pronounced differently?

Table 5: Low Similarity Name Pair Checklist (i.e., combined score is ≤54%).

Names with low similarity are generally acceptable 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.

Appendix B: Prescription Simulation Samples and Results

Figure 1. Zerviate Study (Conducted on March 29, 2017)

Handwritten Medication Order/Prescription	Verbal Prescription
Medication Order: Zerviate 0.24% 1 drop in affected eye twice daily Outpatient Prescription: Zerviate 0.24% 1 drop in each eye BID (approximately 8 hr apart) # 7.5 ml bottle	Zerviate 0.24% 1 drop in each eye twice daily (approximately 8 hours apart). Dispense 7.5 mL bottle

FDA Prescription Simulation Responses (Aggregate 1 Rx Studies Report)

299 People Received Study
78 People Responded

Study Name: Zerviate

Total	26	20	32	
INTERPRETATION	**OUTPATIENT**	**VOICE**	**INPATIENT**	**TOTAL**
XARVIAT	**0**	**1**	**0**	**1**
XERVIATE	**0**	**5**	**0**	**5**
ZAVIET	**0**	**1**	**0**	**1**
ZERBIATE	**0**	**1**	**0**	**1**
ZERIATE	**1**	**0**	**0**	**1**
ZERVATE	**0**	**1**	**0**	**1**
ZERVEA	**0**	**1**	**0**	**1**
ZERVEATE	**0**	**1**	**0**	**1**

ZERVIALE	**0**	**0**	**4**	**4**
ZERVIATA	**1**	**0**	**0**	**1**
ZERVIATE	**18**	**9**	**17**	**44**
ZERVIATE 0.24%	**4**	**0**	**0**	**4**
ZERVIATI	**1**	**0**	**0**	**1**
ZERVIOLE	**0**	**0**	**3**	**3**
ZERVIOTE	**0**	**0**	**2**	**2**
ZERVRATE	**1**	**0**	**0**	**1**
ZEVIATE	**0**	**0**	**3**	**3**
ZEVRIATE	**0**	**0**	**3**	**3**

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

No.	**Proposed name:** Zerviate **Established name:** certirizine **Dosage form:** ophthalmic solution **Strength(s):** 0.24% **Usual Dose:** one drop in each affected eye 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.	(b) (4)***	70	The first two letters (b) (4) of this name pair and the letter 'i' in the suffix of Zerviate that is not present in (b) (4)*** provides sufficient orthographic differences. The first (b) (4) and second (b) (4) syllables of this name pair sounds different. Frequency: twice daily vs. (b) (4) (b) (4)
2.	Serpate	70	The downstroke letter ('p') in the 4th position of Serpate that is not present in Zerviate provides sufficient orthographic differences. Zerviate name contains an extra syllable. The second syllables ('vi' vs. 'pate') of this name pair sound different. Strengths: 0.24% vs. 0.1 mg and 0.25 mg

Appendix D: Moderately Similar Names (e.g., combined POCA score is ≥55% to ≤69%) with no overlap or numerical similarity in Strength and/or Dose

No.	Name	POCA Score (%)
3.	Diatrizoate	60

Appendix E: Moderately Similar Names (e.g., combined POCA score is ≥55% to ≤69%) with overlap or numerical similarity in Strength and/or Dose

No.	**Proposed name:** Zerviate **Established name:** certirizine **Dosage form:** ophthalmic solution **Strength(s):** 0.24% **Usual Dose:** one drop in each affected eye 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**
4.	Prevalite	58	This name pair has sufficient orthographic and phonetic differences.
5.	Dilatrate	56	This name pair has sufficient orthographic and phonetic differences.

No.	**Proposed name:** Zerviate **Established name:** certirizine **Dosage form:** ophthalmic solution **Strength(s):** 0.24% **Usual Dose:** one drop in each affected eye 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**
6.	Isovate	56	This name pair has sufficient orthographic and phonetic differences.
7.	Rexavite	56	This name pair has sufficient orthographic and phonetic differences.
8.	Ruvite	56	This name pair has sufficient orthographic and phonetic differences.
9.	Ultravate	56	This name pair has sufficient orthographic and phonetic differences.
10.	Zeltherva***	56	This name pair has sufficient orthographic and phonetic differences.
11.	Silver Citrate	55	This name pair has sufficient orthographic and phonetic differences.

Appendix F: Low Similarity Names (e.g., combined POCA score is ≤54%)

No.	Name	POCA Score (%)
12.	Zepatier	54
13.	Etravirine	53
14.	Valepotriate	53
15.	Levitra	51
16.	Revia	51
17.	Evitex	50
18.	Revatio	50
19.	Zetia	50
20.	Teriparatide	49
21.	Rifater	48
22.	Rinatec	48
23.	Vita-E	48
24.	Erie Traveler	46
25.	Vite20	46
26.	Emtriva	41

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
27.	(b) (4) ***	68	Proposed proprietary name for (b) (4) (b) (4) found unacceptable by DMEPA (b) (4) (b) (4) (b) (4) (b) (4) (b) (4) *** has been submitted and found acceptable (b) (4) .
28.	Diatrizoate-60	60	Brand discontinued with no generic equivalent available. ANDA 088166 withdrawn FR effective 06/17/1991.
29.	Etretinate	58	Established name for brand discontinued with no generic equivalent available. NDA 019369 withdrawn FR effective 09/10/2003.
30.	Certiva	56	Discontinued dtap vaccine product with no generic equivalents available.
31.	Levulinate	56	Product is not a drug. It is a salt of levulinic acid.
32.	Myristate	56	Product is not a drug. It is an ester of myristic acid.
33.	Rinfabate	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases
34.	Zerit XR	56	Brand discontinued with no generic equivalent available. NDA 021453 withdrawn pending FR notice effective 02/11/2005.
35.	Bezafibrate	55	Established name for International products marketed in Europe and Japan.
36.	Estrate	55	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases
37.	Zinc Valerate	55	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.

Appendix H: Names not likely to be confused due to absence of attributes that are known to cause name confusion[h].

No.	Name	POCA Score (%)
38.	Vertavis	64
39.	Freeze It	62

[h] Shah, M, Merchant, L, Chan, I, and Taylor, K. Characteristics That May Help in the Identification of Potentially Confusing Proprietary Drug Names. Therapeutic Innovation & Regulatory Science, September 2016

No.	Name	POCA Score (%)
40.	Citravet	60
41.	Perlite	60
42.	Viracept	60
43.	Viravan-T	60
44.	Vitrasert	60
45.	Leribane	59
46.	Serathide	58
47.	Verazinc	58
48.	Virazid	58
49.	Levlite	57
50.	Velivet	57
51.	Veripred	57
52.	Viread	57
53.	8-1 Marvel Aid	56
54.	Avitears	56
55.	Certican***	56
56.	Dermarest	56
57.	Pariet	56
58.	Pherazine Vc	56
59.	Retavase	56
60.	Travel-Eze	56
61.	Veramyst	56
62.	Verticalm	56
63.	Verzenio***	56
64.	Virbantel	56
65.	Certeareth-100	55
66.	(b) (4) ***	55
67.	Fortovase	55
68.	Perazine	55
69.	(b) (4) ***	55
70.	Verdrocet	55
71.	Vetrimec	55

Appendix I: Names identified in the eDRLS database not likely to be confused due to notable spelling, orthographic and phonetic differences.

No.	Name
1.	Antibacterial Moist Wipes
2.	Better Braids
3.	Colgate
4.	Controlling balm with tea tree oil
5.	Crayola
6.	Electrifying Blue Polish

No.	Name
7.	End-Itch for Eczema
8.	Gum
9.	LBEL
10.	Lornamead
11.	LUSTER NOW
12.	max2originale Special Mascara Gold
13.	OralLine
14.	OralLine Kids
15.	OralLine Secure
16.	Peanuts Anti-Cavity Fluoride Toothpaste
17.	Periosciences White Care AO Pro
18.	Plak Smacker Anti Cavity Fluoride
19.	Power-Rangers
20.	Provence Air Skin Fit Pact 01 Light Beige
21.	Sani-Hands for Kids
22.	Sebum Out Moisturizing
23.	Secret Antiperspirant
24.	SmileActives
25.	Spearmint and Peppermint Plaque A Way Fluoride AnticavityGentle Formula
26.	Symmetry Non-Alcohol Foaming Hand Sanitizer
27.	toothpowder
28.	Walgreens

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/s/

MADHURI R PATEL
04/20/2017

SARAH K VEE
04/20/2017

PROPRIETARY NAME MEMORANDUM

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:	June 2, 2016
Application Type and Number:	NDA 208694
Product Name and Strength:	Zerviate (Cetirizine) Ophthalmic Solution, 0.24%
Product Type:	Single Ingredient
Rx or OTC:	Rx
Applicant/Sponsor Name:	Nicox Ophthalmics, Inc
Panorama #:	2016-7688967
DMEPA Primary Reviewer:	Michelle Rutledge, PharmD
DMEPA Team Leader:	Yelena Maslov, PharmD

1 INTRODUCTION

This memorandum is to reassess the proposed proprietary name, Zerviate, which was found conditionally acceptable under IND 108558 on September 3, 2015.[1] We note that all product characteristics remain the same.

2 METHODS AND DISCUSSION

For re-assessment of the proposed proprietary name, DMEPA evaluated the previously identified names of concern considering any lessons learned from recent post-marketing experience, which may have altered our previous conclusion regarding the acceptability of the proposed proprietary name. Additionally, DMEPA searched the USAN stem list to determine if the name contains any USAN stems as of the last USAN updates. The June 1, 2016 search of USAN stems did not find any USAN stems in 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 Transplant and Ophthalmology Products (DTOP) concurred with the findings of OPDP's assessment of the proposed name.

3 CONCLUSIONS

Our re-assessment did not identify any names that represent a potential source of drug name confusion. Therefore, we maintain that the proposed proprietary name is acceptable.

If you have any questions or need clarifications, please contact Janet Higgins, OSE project manager, at 240-402-0330.

3.1 COMMENTS TO THE APPLICANT

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

If any of the proposed product characteristics as stated in your April 26, 2016 submission are altered prior to approval of the marketing application, the name must be resubmitted for review.

[1] [Garrison, N]. Proprietary Name Review for [Zerviate (IND 208694)]. Silver Spring (MD): Food and Drug Administration, Center for Drug Evaluation and Research, Office of Surveillance and Epidemiology, Division of Medication Error Prevention and Analysis (US); [Insert Date as 2015 SEP 03]. Panorama No. [2015-818134].

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.

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/s/

MICHELLE K RUTLEDGE
06/02/2016

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06/06/2016