

**CENTER FOR DRUG EVALUATION AND  
RESEARCH**

*APPLICATION NUMBER:*

**209394Orig1s000**

**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)

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**\*\*This document contains proprietary drug use data obtained by FDA under contract. The drug use data/information cannot be released to the public/non-FDA personnel without contractor approval obtained through the FDA/CDER Office of Surveillance and Epidemiology.\*\***

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<b>Date of This Review:</b>	May 30, 2017
<b>Application Type and Number:</b>	NDA 209394
<b>Product Name and Strength:</b>	Mavyret (glecaprevir and pibrentasvir) Tablet, 100 mg/40 mg
<b>Product Type:</b>	Multi-ingredient Product
<b>Rx or OTC:</b>	Rx
<b>Applicant/Sponsor Name:</b>	AbbVie, Inc.
<b>Panorama #:</b>	2017-13814998
<b>DMEPA Primary Reviewer:</b>	Valerie S. Wilson, PharmD
<b>DMEPA Team Leader (Acting):</b>	Otto L. Townsend, PharmD

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## 1 INTRODUCTION

This review evaluates the proposed proprietary name, Mavyret, 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 [REDACTED] (b) (4), for this product.

### 1.1 REGULATORY HISTORY

- **June 10, 2016:**

The Applicant submitted the proposed proprietary name, [REDACTED] (b) (4) to IND 127416 on June 10, 2016. However, the Division of Medication Error Prevention and Analysis (DMEPA) found the name, [REDACTED] (b) (4) unacceptable because the name may misleadingly suggest that the drug is more powerful, strong, or aggressive treatment for HCV infections as compared to other drugs in the same class, Panorama #: 2016-8524628, dated July 26, 2016.

- **December 14, 2016:**

The Applicant submitted the proposed proprietary name, [REDACTED] (b) (4) on December 14, 2016. However, in OSE Review, Panorama #2016-11931053, dated March 6, 2017, the Division of Medication Error Prevention and Analysis (DMEPA) found the name, [REDACTED] (b) (4) unacceptable because the proposed name contains the United States Adopted Name (USAN) stem “[REDACTED] (b) (4)”

- The Applicant submitted the name, Mavyret, for review on March 17, 2017.

### 1.2 PRODUCT INFORMATION

The following product information is provided in the March 17, 2017 proprietary name submission.

- Intended Pronunciation: mav-ih-reht
- Active Ingredient: glecaprevir and pibrentasvir
- Indication of Use: Treatment of hepatitis C virus (HCV)
- Route of Administration: Oral
- Dosage Form: Tablet
- Strength: 100 mg/40 mg
- Dose and Frequency: 3 tablets once daily
- How Supplied: 7 wallets in weekly cartons, each wallet will contain 1 daily dose of 3 tablets of glecaprevir and pibrentasvir
- Storage: [REDACTED] (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 Antiviral Products (DAVP) 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>a</sup>.

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

The Applicant did not provide a derivation or intended meaning for the proposed name, Mavyret 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.

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

In response to the OSE, March 29, 2017 e-mail, the Division of Antiviral Products (DAVP) 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-nine 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<sup>b</sup> identified eighty-four names with a combined phonetic and orthographic score of  $\geq 55\%$  or an individual phonetic or orthographic score  $\geq 70$ . These names are included in Table 1 below.

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<sup>a</sup> USAN stem search conducted on April 17, 2017.

<sup>b</sup> POCA search conducted on April 17, 2017 in version 4.0.

**2.2.6 Names Retrieved for Review Organized by Name Pair Similarity**

Table 1 lists the number of names retrieved from our POCA search and the (b) (4) external study. These name pairs are organized as highly similar, moderately similar, or low similarity for further evaluation.

<b>Table 1. Similarity Category</b>	<b>Number of Names</b>
Highly similar name pair: combined match percentage score $\geq 70\%$	2
Moderately similar name pair: combined match percentage score $\geq 55\%$ to $\leq 69\%$	90
Low similarity name pair: combined match percentage score $\leq 54\%$	8

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

Our analysis of the 100 names contained in Table 1 determined none would 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 Antiviral Products (DAVP) via e-mail on May 18, 2017. At that time, we also requested additional information or concerns that could inform our review. Per e-mail correspondence from DAVP on May 24, 2017, they stated no additional concerns with the proposed proprietary name, Mavyret.

**3 CONCLUSIONS**

The proposed proprietary name is acceptable.

If you have any questions or need clarifications, please contact Danyal Chaudhry, OSE project manager, at 301-796-3813.

**3.1 COMMENTS TO THE APPLICANT**

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

If any of the proposed product characteristics as stated in your March 17, 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](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 support 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. <sup>c</sup>

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<sup>c</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 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 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  $\geq 70\%$ .
  - Moderately similar pair: combined match percentage score  $\geq 55\%$  to  $\leq 69\%$ .
  - Low similarity: combined match percentage score  $\leq 54\%$ .

Using the criteria outlined in the checklist (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 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<sup>d</sup>. 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.,

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<sup>d</sup> 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  $\geq 70\%$ ).**

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 does not share a common strength or dose.			
<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 z and f), 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 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  $\geq 55\%$  to  $\leq 69\%$ ).**

Step 1	<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>
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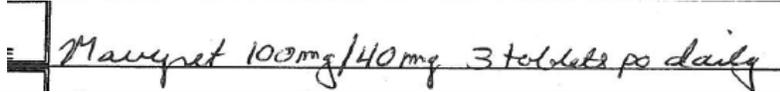
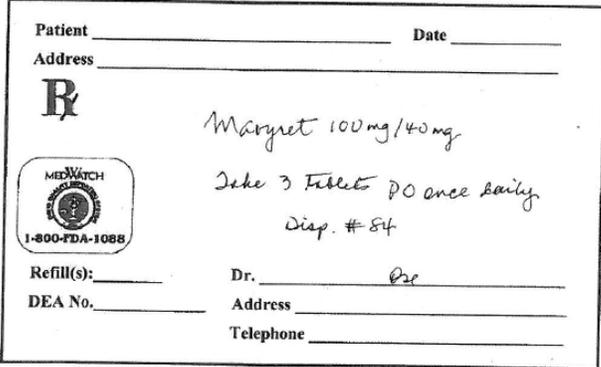
Step 2	Answer the questions in the checklist below. Affirmative answers to some of these questions suggest that the pattern of orthographic or phonetic differences in the names may reduce the likelihood of confusion for moderately similar names <b>with</b> overlapping or similar strengths or doses.	
	<p>Orthographic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <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>

**Table 5: Low Similarity Name Pair Checklist (i.e., combined score is  $\leq 54\%$ ).**

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. Mavyret Study (Conducted on April 4, 2017)**

Handwritten Medication Order/Prescription	Verbal Prescription
<p>Medication Order:</p> 	<p>Mavyret 100 mg/40 mg Take 3 tablets by mouth once daily</p>
<p>Outpatient Prescription:</p> 	<p>Dispense #84</p>

**FDA Prescription Simulation Responses (Aggregate 1 Rx Studies Report)**

<p>Study Name: Mavyret</p>					<p>299 People Received Study 79 People Responded</p>
<b>Total</b>	<b>33</b>	<b>22</b>	<b>24</b>		
<b>INTERPRETATION</b>	<b>OUTPATIENT</b>	<b>VOICE</b>	<b>INPATIENT</b>	<b>TOTAL</b>	
LAZERET	0	1	0	1	
MA?YRET	1	0	0	1	
MADARET	0	1	0	1	
MADARETTE	0	1	0	1	
MAGVYRET	1	0	0	1	
MAOYRET	6	0	0	6	
MAOZRET	1	0	0	1	

MARGRET	2	0	0	2
MARVYEST	0	0	1	1
MARYET	1	0	0	1
MARYRET	5	0	0	5
MATARAK	0	1	0	1
MATARET	0	1	0	1
MATHERET	0	1	0	1
MAUGNET	0	0	1	1
MAUYRET	1	0	2	3
MAVARET	0	4	0	4
MAVARETTE	0	1	0	1
MAVERAT	0	2	0	2
MAVERET	0	2	0	2
MAVERETT	0	1	0	1
MAVGRET	1	0	1	2
MAVYNET	0	0	4	4
MAVYRET	13	0	15	28
MAZARETTE	0	1	0	1
MYOYRET	1	0	0	1
NASARET	0	1	0	1
NATHEREK	0	1	0	1
NAVERETTE	0	1	0	1
NAVORETTE	0	1	0	1
VATARAT	0	1	0	1

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

No.	Proposed name: Mavyret Established name: glecaprevir and pibrentasvir Dosage form: tablet Strength(s): 100 mg/40 mg Usual Dose: 3 tablets once 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)	92	Name previously submitted to NDA 209394 but was found unacceptable on March 6, 2017, OSE RCM# 2016-11931053. The Applicant later submitted Mavyret, the subject of this review.
2.	(b) (4)	70	Veterinary product.

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

No.	Name	POCA Score (%)
1.	Mavik	60
2.	Mygrex	59
3.	Maraviroc	58
4.	Myrbetriq	58
5.	Myfortic	56
6.	Myphetapp	56
7.	Malarone	55

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

No.	Proposed name: Mavyret Established name: glecaprevir and pibrentasvir Dosage form: tablet Strength(s): 100 mg/40 mg Usual Dose: 3 tablets once 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.	Somavert	68	This name pair has sufficient orthographic and phonetic differences.
2.	(b) (4)	64	(b) (4)

No.	<b>Proposed name: Mavyret</b> <b>Established name: glecaprevir and pibrentasvir</b> <b>Dosage form: tablet</b> <b>Strength(s): 100 mg/40 mg</b> <b>Usual Dose: 3 tablets once daily</b>	<b>POCA 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>
3.	Moviprep	63	This name pair has sufficient orthographic differences. There is no dose overlap.
4.	Maxair	62	This name pair has sufficient orthographic and phonetic differences.
5.	Mytrex	62	This name pair has sufficient orthographic and phonetic differences.
6.	Magtrate	61	This name pair has sufficient orthographic and phonetic differences.
7.	Monoject	60	This name pair has sufficient orthographic and phonetic differences.
8.	Myleran	60	This name pair has sufficient orthographic and phonetic differences.
9.	MacerRx	59	This name pair has sufficient orthographic and phonetic differences.
10.	Airet	58	This name pair has sufficient orthographic and phonetic differences.
11.	Marplan	58	This name pair has sufficient orthographic and phonetic differences.
12.	Mykacet	58	This name pair has sufficient orthographic and phonetic differences.
13.	Ovrette	58	This name pair has sufficient orthographic and phonetic differences.
14.	Masalate	56	This name pair has sufficient orthographic and phonetic differences.
15.	Maxalt	56	This name pair has sufficient orthographic and phonetic differences.
16.	Maxivate	56	This name pair has sufficient orthographic and phonetic differences.
17.	Mebaral	56	This name pair has sufficient orthographic and phonetic differences.
18.	Metra	56	This name pair has sufficient orthographic and phonetic differences.
19.	Metreton	56	This name pair has sufficient orthographic and phonetic differences.
20.	Myrac	56	This name pair has sufficient orthographic and phonetic differences.
21.	Mexate	55	This name pair has sufficient orthographic and phonetic differences.
22.	Vaseretic	55	This name pair has sufficient orthographic and

No.	<b>Proposed name: Mavyret</b> <b>Established name: glecaprevir and pibrentasvir</b> <b>Dosage form: tablet</b> <b>Strength(s): 100 mg/40 mg</b> <b>Usual Dose: 3 tablets once daily</b>	<b>POCA 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>
23.	Vaseretic 10-25	55	phonetic differences.
24.	Vaseretic 5-12.5	55	

**Appendix F:** Low Similarity Names (e.g., combined POCA score is  $\leq$  54%)

No.	Name	POCA Score (%)
1.	Kineret	52
2.	Sotret	48
3.	Nicorette	46
4.	Marvelon	45
5.	Caduet	44
6.	Janumet	42
7.	Viread	40
8.	Lorcet-HD	30

**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.	Moduret	68	International product marketed in Canada, Ireland, and United Kingdom.
2.	Myreth-4	66	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
3.	Mederek	65	Discontinued product per Redbook with no generic equivalents.
4.	(b) (4)	62	(b) (4)
5.	Marpres	62	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
6.	Medivert	62	Discontinued product per Redbook with no generic equivalents.
7.	Mygracet	61	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
8.	Mesylate	60	Salt or ester of methanesulfonic acid
9.	Menorest 37.5	59	International product formerly marketed in Philippines, Czech Republic, Australia, Austria, Brazil, Finland, France, Germany, Greece, Ireland, Italy, Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom, Denmark, and South Africa
10.	Menorest 50	59	International product formerly marketed in Philippines, Czech Republic, Australia, Austria, Brazil, Finland, France, Germany, Greece, Ireland, Italy, Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom, Denmark, and South Africa
11.	Menorest 75	59	International product formerly marketed in Philippines, Czech Republic, Australia, Austria, Brazil, Finland, France, Germany, Greece, Ireland, Italy, Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom, Denmark, and South Africa
12.	Imaverol	58	Veterinary product marketed in Canada.
13.	Mal-A-Ket	58	Veterinary product.
14.	Maleate	58	Salt or ester of maleic acid.
15.	Matrix	58	Veterinary product

No.	Name	POCA Score (%)	Failure preventions
16.	Mytrex A	58	Brand discontinued with no generic equivalent available. ANDA 062598 and ANDA 062609 was withdrawn FR effective 07/12/1999.
17.	Maxier	57	Name identified by (b) (4) but unable to find product characteristics in commonly used drug databases.
18.	Metoros	57	International product formerly marketed in Austria.
19.	Malate	56	Non- drug, a salt of malic acid.
20.	Matmate	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
21.	Migracet	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
22.	Tenoret	56	International product marketed in Hong Kong, Ireland, South Africa, and United Kingdom.
23.	Medipred	55	International product marketed in India.
24.	Arret	54	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<sup>e</sup>.

No.	Name	POCA Score (%)
1.	Valtrex	68
2.	Evarrest	64
3.	Ivarest	62
4.	Kava Root	62
5.	Rabavert	62
6.	Betavet	61
7.	Alavert	60
8.	Antivert	60
9.	Nysert	60
10.	Univert	60
11.	Butyrate	59
12.	D-Vert	59

<sup>e</sup> 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 (%)
13.	Terra-Vet	59
14.	3M Avagard	58
15.	Dermarest	58
16.	Invarest	58
17.	Novacet	58
18.	Valerate	58
19.	Americet	57
20.	Eumovate	57
21.	Wal-Vert	57
22.	8-1 Marvel Aid	56
23.	Baytet	56
24.	Caverject	56
25.	Darvocet	56
26.	Emerita	56
27.	Emverm	56
28.	Novarel	56
29.	Percocet	56
30.	Vaymeris	56
31.	Allerest	55
32.	Avodart	55
33.	Pariet	55
34.	Nazarin	54
35.	Novrad	54

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

No.	Name
1.	N/A

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/s/  
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VALERIE S WILSON  
05/30/2017

OTTO L TOWNSEND  
05/31/2017

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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)

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**Date of This Review:** March 06, 2017  
**Application Type and Number:** NDA 209394  
**Product Name and Strength:** (b) (4) (glecaprevir and pibrentasvir) Tablet,  
100 mg/40 mg  
**Product Type:** Multi-ingredient Product  
**Rx or OTC:** Rx  
**Applicant/Sponsor Name:** Abbvie  
**Panorama #:** 2016-11931053  
**DMEPA Primary Reviewer:** Valerie Wilson, PharmD  
**DMEPA Team Leader:** Vicky Borders-Hemphill, PharmD  
**DMEPA Associate Director (Acting):** Mishale Mistry, PharmD, MPH  
**DMEPA Director:** Todd Bridges, RPh

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