

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

217370Orig1s000

PROPRIETARY NAME REVIEW(S)

PROPRIETARY NAME REVIEW

Division of Medication Error Prevention and Analysis 1 (DMEPA 1)
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:	August 19, 2024
Application Type and Number:	NDA 217370
Product Name, Dosage Form, and Strength:	Tryptyr (acoltremon) ophthalmic solution, 0.003%
Product Type:	Combination Product (Drug-Device)
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Alcon Laboratories, Inc. (Alcon)
PNR ID #:	2024-1044725819
DMEPA 1 Safety Evaluator:	Sofanit Getahun, PharmD, BCPS
DMEPA 1 Team Leader:	Valerie S. Vaughan, PharmD
DMEPA 1 Associate Director for Nomenclature and Labeling:	Idalia E. Rychlik, PharmD

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1 INTRODUCTION

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

1.1 PRODUCT INFORMATION

The following product information is provided in the proprietary name submission received on May 31, 2024^b, and the prescribing information received on May 30, 2024^c.

Table 1. Relevant Product Information for Tryptyr	
Intended pronunciation:	trip' tir
Active ingredient:	acoltremon
Indication:	Treatment of signs and symptoms of dry eye disease (DED).
Dosage Form:	ophthalmic solution
Strength:	0.003%
Route of administration:	Ophthalmic
Dose and frequency:	1 drop into each eye twice daily.
How Supplied:	One strip of 5 single- (b) (4) vials is packaged in a foil pouch with twelve (12) pouches in a carton.
Storage:	Store refrigerated at 2°C to 8°C (36°F to 46°F), (b) (4). After opening the carton, (b) (4) may be stored refrigerated or at room temperature at 2°C to 25°C (36°F to 77°F) (b) (4) should be used within 30 days, not to exceed the expiration date printed on the carton and pouch. After opening each foil pouch, the (b) (4) should be used within 7 days, not to exceed the expiration date printed on the vial.

^a Proprietary Name Safety Summary. (b) (4) 2024 MAY 31. Available from: <\\CDSESUB1\EVSPROD\nda217370\0002\m1\us\m1-18-proprietary-name-safety-summary-tryptyr.pdf>

^b Cover Letter (NDA 217370 acoltremon). Lake Forest (CA): Alcon Laboratories, Inc.; 2024 MAY 31. Available from: <\\CDSESUB1\EVSPROD\nda217370\0002\m1\us\m1-2-cover-letter.pdf>

^c Proposed prescribing information for Tryptyr. Lake Forest (CA): Alcon Laboratories, Inc.; 2024 MAY 30. Available from: <\\CDSESUB1\EVSPROD\nda217370\0001\m1\us\m1-14-1-3-draft-labeling-text.docx>

2 DISCUSSION

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

2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that Tryptyr would not misbrand the proposed product. The Division of Medication Error Prevention and Analysis 1 (DMEPA 1) concurred with the findings of OPDP's assessment for Tryptyr. However, the Division of Ophthalmology (DO) initially commented that *"It appears the proprietary name TRYPTYR is alluding to the mechanism of action (MOA). The Prescribing Information (PI) states the MOA of this product is (b) (4) agonist of TRPM8 ion channels. The proposed indication is treatment of the signs and symptoms dry eye disease (DED); however, the PI also states the exact mechanism of action for TRADENAME in DED is unknown at this time."* DO stated that OSE/OPDP *"consider whether it is promotional (b) (4) (b) (4) when the exact MOA in DED is unknown."*

We relayed DO's concerns to OPDP. Subsequently OPDP re-evaluated the proposed proprietary name "TRYPTYR" and maintained their non-objection to "TRYPTYR" from a promotional perspective. OPDP stated that *"the proposed indication is for the treatment of the signs and symptoms of dry eye disease (DED). The OPDP PNR team discussed that the first part of the name, "TRYP," could potentially evoke the drug's proposed mechanism of action as a TRPM8 thermoreceptor agonist. The team concluded that if a promotional connection is made between the term "TRPM8" and this product, such a connection would not be false or misleading regarding the safety or efficacy of the drug and may be sufficiently linked to the proposed pharmacologic class and proposed mechanism of action as an agonist of TRPM8 ion channels. Additionally, the team discussed that the second half of the name, "TYR," could evoke the word "tear." The team concluded that if a promotional connection is made between the term "tear" and this product, such a connection would not be false or misleading regarding the efficacy of the drug as the clinical program evaluated for "TRYPTYR" evaluated tear film production. We also considered the association of both "TRPM8" and "tear" together within the proposed proprietary name to determine whether it may be interpreted to misrepresent the efficacy of the product. However, given that there is no link to establish causality between the evocation of "TRPM8" and "tear," the consensus of the team was that the connection between "TRPM8" and "tear" within the context of the proposed proprietary name was not sufficiently definitive to support an objection."*

Following OPDP's re-evaluation of the proprietary name, the Division of Ophthalmology (DO) did not forward any additional comments or concerns relating to Tryptyr from a promotional perspective.

2.2 SAFETY ASSESSMENT

The following aspects were considered in the safety evaluation of the proposed proprietary name, Tryptyr.

2.2.1 UNITED STATES ADOPTED NAMES (USAN) SEARCH

There is no USAN stem present in the proposed proprietary name.^d

2.2.2 COMPONENTS OF THE PROPOSED PROPRIETARY NAME

Alcon did not provide a derivation or intended meaning for the proposed proprietary name, Tryptyr, in their submission. The proposed proprietary name, Tryptyr, is comprised of a single word that contains the letter string “TR,” a medical abbreviation to described dosage form ‘timed-release.’ In some circumstances, the incorporation of medical abbreviations in proprietary names can inadvertently be a source of error. For more information see draft guidance, *Best Practices in Developing Proprietary Names for Human Prescription Drug Products*.^e

We considered the possibility that the abbreviation, “TR,” located in the prefix could result in name confusion if it were to be inadvertently interpreted as a modifier or as part of the prescription directions, separate from the proposed proprietary name, Tryptyr (e.g., user interprets order as TR Yptyr). Currently there is no product marketed under the proprietary name, ‘Yptyr,’ or beginning with the letter string, ‘ypt.’

Thus, in this case, we do not object to the inclusion of the letter string ‘TR’ in the prefix of the proposed proprietary name.

2.2.3 COMMENTS FROM OTHER REVIEW DISCIPLINES AT INITIAL REVIEW

On July 2, 2024, the Division of Ophthalmology (DO) did not forward any comments or concerns relating to Tryptyr at the initial phase of the review.

2.2.4 FDA PRESCRIPTION SIMULATION STUDIES

Ninety (90) practitioners participated in DMEPA’s prescription simulation studies for Tryptyr.

One respondent in the Verbal study misinterpreted the proposed proprietary name as “Tripdur”, and one respondent in the outpatient written study misinterpreted as ‘Truptur,’ which look and sound similar to the currently marketed product “Triptodur.” We further evaluated these name pairs Tryptyr *versus* Triptodur.

Orthographically, the name pair differs in length (7 *versus* 9 letters) and the dotted letter ‘i’ in the prefix and letter string ‘od’ in the infix of Triptodur provide for differences in shape and orthographic appearance. Phonetically, the names have a different number of syllables (two *versus* three), where the name Triptodur includes the additional syllable ‘-to-’ not present in the name Tryptyr which offers some phonetic difference. Furthermore, the product characteristics between the name pair are different. Specifically, Tryptyr does not overlap with Triptodur in dosage form (ophthalmic suspension *versus* for injection) or route of administration (ophthalmic *versus* intramuscular), if included on a prescription order this may help to mitigate

^d USAN stem search conducted on June 5, 2024.

^e Guidance for Industry: Best Practices in Developing Proprietary Names for Human Prescription Drug Products. 2020. Available from: <https://www.fda.gov/regulatory-information/search-fda-guidance-documents>.

confusion. Additionally, Tryptyr and Triptodur differ in frequency and setting of use (Tryptyr is proposed as an eye drop for at home patient use twice daily *versus* Triptodur is an intramuscular injection administered by healthcare providers within a healthcare setting every 24 weeks).

Therefore, when the aforementioned mitigations are considered in totality, for the name pairs Tryptyr *versus* Triptodur, we find the risk of name confusion is adequately minimized in this case.

The remaining 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 prescription simulation studies.

2.2.5 PHONETIC AND ORTHOGRAPHIC COMPUTER ANALYSIS (POCA) SEARCH RESULTS

Our POCA search^f identified 35 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 2 below.

2.2.6 NAMES RETRIEVED FOR REVIEW ORGANIZED BY NAME PAIR SIMILARITY

Table 2 provides the number of names retrieved from our POCA search, and (b) (4) external study. These name pairs are organized as highly similar, moderately similar, or low similarity for further evaluation.

Table 2. Names Retrieved for Review Organized by Name Pair Similarity	
Similarity Category	Number of Names
Highly similar name pair: combined match percentage score $\geq 70\%$	4
Moderately similar name pair: combined match percentage score $\geq 55\%$ to $\leq 69\%$	27
Low similarity name pair: combined match percentage score $\leq 54\%$	10

2.2.7 SAFETY ANALYSIS OF NAMES WITH POTENTIAL ORTHOGRAPHIC, SPELLING, AND PHONETIC SIMILARITIES

Our analysis of the 41 names contained in Table 2 determined none of the names will pose a risk for confusion with Tryptyr as described in Appendices C through H.

2.2.8 COMMUNICATION OF DMEPA'S DETERMINATION

On August 19, 2024, DMEPA 1 communicated our determination to the Division of Ophthalmology (DO).

3 CONCLUSION

The proposed proprietary name, Tryptyr, is conditionally acceptable.

^f POCA search conducted on June 5, 2024, in version 5.9.

3.1 COMMENTS TO ALCON LABORATORIES, INC.

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

If any of the proposed product characteristics as stated in your submission, received on May 31, 2024, are altered prior to approval of the marketing application, the proprietary name must be resubmitted for review.

4 REFERENCES

1. *United States Adopted Names (USAN) Stems*

USAN Stems List contains all the recognized USAN stems, available at <https://www.ama-assn.org/about/united-states-adopted-names/united-states-adopted-names-approved-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 <https://www.fda.gov/drugs/drug-approvals-and-databases/drugsfda-glossary-terms>).

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>).

Purple Book

The Purple Book is an online database that contains information about biological products, including biosimilar and interchangeable biological products, licensed (approved) by the FDA under the Public Health Service (PHS) Act. See Purple Book: Lists of Licensed Biological Products with Reference Product Exclusivity and Biosimilarity or Interchangeability Evaluations, available at <https://www.fda.gov/drugs/therapeutic-biologics-applications-bla/purple-book-lists-licensed-biological-products-reference-product-exclusivity-and-biosimilarity-or>.

Division of Medication Errors Prevention and Analysis pending proprietary name requests

This is a list of proposed and pending names that is generated by the Division of Medication Error Prevention and Analysis.

5 APPENDICES

APPENDIX A. FDA'S PROPRIETARY NAME RISK ASSESSMENT EVALUATES PROPOSED PROPRIETARY NAMES FOR MISBRANDING AND SAFETY CONCERNS

- Misbranding Assessment:** For prescription drug products, the Office of Prescription Drug Promotion (OPDP) assesses the name for misbranding concerns. For over-the-counter (OTC) drug products, the misbranding assessment of the proposed name is conducted by the Office of Non-Prescription Drugs (ONPD). OPDP or ONPD 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 ONPD provides their opinion to DMEPA for consideration in the overall acceptability of the proposed proprietary name.
- Safety Assessment:** The safety assessment is conducted by DMEPA, and includes the following:
 - 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 3*. 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.^g

*Table 3. 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.

^g National Coordinating Council for Medication Error Reporting and Prevention. <https://www.nccmerp.org/about-medication-errors>. Last accessed 10/05/2020.

*Table 3. 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 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, Cerner RxNorm, Purple Book, 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 check list (Table 4-6) 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 4).
- 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^h. 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., 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 5).
 - Names with low similarity that have no overlap or similarity in strength and dose are generally acceptable (See Table 6) 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 also conducts prescription simulation studies using FDA health care professionals.
- Four 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, verbal pronunciation of the drug name or during computerized provider order entry. 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 vulnerability of the proposed name to be misinterpreted by healthcare practitioners during written, verbal, or electronic prescribing.
- In order to evaluate the potential for misinterpretation of the proposed proprietary name during written, verbal, or electronic prescribing of the name, written inpatient medication orders, written outpatient prescriptions, verbal orders, and electronic orders are simulated, each consisting of a combination of marketed and unapproved drug products, including the proposed name.
- d. Comments from Other Review Disciplines: DMEPA requests the Office of New Drugs (OND), Office of Generic Drugs (OGD), and/or Office of Pharmaceutical Quality (OPQ) 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-

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

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.

Additionally, other review disciplines opinions such as OPQ 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 Safety Evaluator 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 4. 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.			
Orthographic Checklist		Phonetic Checklist	
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 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 5: Moderately Similar Name Pair Checklist (i.e., combined score is $\geq 55\%$ to $\leq 69\%$).

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.				
	<table border="1"> <thead> <tr> <th data-bbox="310 1209 870 1287">Orthographic Checklist (Y/N to each question)</th> <th data-bbox="870 1209 1425 1287">Phonetic Checklist (Y/N to each question)</th> </tr> </thead> <tbody> <tr> <td data-bbox="310 1287 870 1858"> • 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? </td> <td data-bbox="870 1287 1425 1858"> • 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? </td> </tr> </tbody> </table>	Orthographic Checklist (Y/N to each question)	Phonetic 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?	• 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?
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Table 5: Moderately Similar Name Pair Checklist (i.e., combined score is $\geq 55\%$ to $\leq 69\%$).

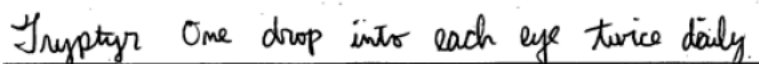
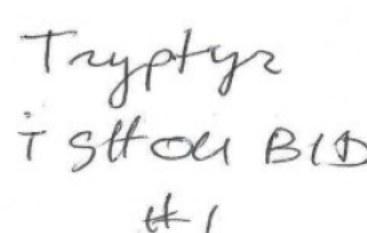
	• Is there different number or placement of cross-stroke or dotted letters present in the names? • Do the infixes of the name appear dissimilar when scripted? • Do the suffixes of the names appear dissimilar when scripted?	
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Table 6. Low Similarity 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. Tryptyr Study (Conducted on 6/7/2024)

Handwritten Medication Order Prescription	Verbal Prescription
<u>Medication Order:</u> 	Tryptyr Instill one drop into each eye twice daily. Dispense #1 Box
<u>Outpatient Prescription:</u> 	
CPOE Study Sample (displayed as sans-serif, 12-point, bold font) Tryptyr	

FDA Prescription Simulation Responses (Aggregate Report)					
Study Name: Tryptyr					
People Received Study: 196					
People Responded: 90					
Total	20	28	20	22	90
INTERPRETATION	INPATIENT	OUTPATIENT	VOICE	CPOE	TOTAL
FRYPTYR	1	0	0	0	1
TRIPDUR	0	0	1	0	1
TRIPTER	0	0	12	0	12
TRIPTOR	0	0	1	0	1
TRIPTUR	0	0	1	0	1
TRIPTYR	0	0	2	0	2
TRUPTUR	1	0	0	0	1
TRYPTER	0	0	1	0	1
TRYPTOR	0	0	1	0	1
TRYPTR	1	0	0	0	1
TRYPTUR	1	0	0	0	1
TRYPTYR	15	27	1	22	65
TRYPTYZ	1	1	0	0	2

APPENDIX C. HIGHLY SIMILAR NAMES (e.g., combined POCA score is $\geq 70\%$)

No.	Proposed name: Tryptyr Pronunciation: trip' tir Established name: acoltremon Dosage form: ophthalmic solution Strength(s): 0.003% Dosage: 1 drop into each 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.	Tryptyr	100	This name is the subject of this review.
2.	Dryptal	73	International product formerly marketed in United Kingdom and other countries per Micromedex database.
3.	(b) (4) ***	73	Proposed proprietary name reviewed under IND (b) (4) as well as NDA (b) (4). Proposed proprietary name found to be unacceptable under NDA (b) (4) (OSE # (b) (4)) on April 22, 2021, due to conflict with another pending name, Qulipta***, under review for NDA 215206. Subsequently, the name (b) (4) *** was withdrawn by the Applicant on June 8, 2021, under IND (b) (4). Moreover, the application for NDA 215206 was approved under the name Qulipta, thus, (b) (4) ** is no longer a viable name.
4.	Trypsin	70	Product is not a drug. It is an enzyme.

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.	Crestor	60
2.	Trelstar	60
3.	Rytary	59
4.	Tricor	56
5.	Erypar	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: Tryptyr Pronunciation: trip' tir Established name: acoltremon Dosage form: ophthalmic solution Strength(s): 0.003% Dosage: 1 drop into each 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
1.	Triptodur	62	see FMEA in Section 2.2.4
2.	Triptone	60	Orthographically, the downstroke letter 'y' in the sixth position followed by 'r' in the seventh position of Tryptyr <i>versus</i> the letter string 'one' in similar position of Triptone provide sufficient orthographic differentiation. Phonetically, the second syllables (tir <i>versus</i> tone) provide sufficient differences.
3.	Trecator	60	This name pair has sufficient orthographic and phonetic differences.
4.	(b) (4) ***	59	This name pair has sufficient orthographic and phonetic differences.
5.	Trymex	56	This name pair has sufficient orthographic and phonetic differences.
6.	Trental	56	This name pair has sufficient orthographic and phonetic differences.
7.	Trizivir	55	Orthographically, the suffixes (-tyr <i>versus</i> -vir) provide sufficient orthographic differentiation. Phonetically, the names have different number of syllables (two <i>versus</i> three), and the onset of the second syllables (tir <i>versus</i> zih) provide sufficient differences.

No.	Proposed name: Tryptyr Pronunciation: trip' tir Established name: acoltremon Dosage form: ophthalmic solution Strength(s): 0.003% Dosage: 1 drop into each 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
8.	Trusopt	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 (%)
1.	Predcor	54
2.	Rydapt	54
3.	Proscar	53
4.	Triphed	50
5.	Triptorelin	50
6.	Ry-T-12	48
7.	Trypan Blue	46
8.	Tripalmitin	41
9.	Tripolidine	35
10.	Tripelennamine	26

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.	Trituss Er	60	Name identified in RxNorm database. Product is deactivated and no generic equivalents are available.
2.	Tryptophan	59	Product is not a drug. It is an essential amino acid.
3.	Trysul	56	Brand discontinued with no generic equivalents available. ANDA 087887 withdrawn FR effective 12/07/2007.
4.	Tritop	56	Veterinary product.
5.	Trital Sr	56	Name identified in RxNorm database. Product is deactivated and no generic equivalents are available.
6.	Trosyl	56	International product marketed in the United Kingdom and Ireland.
7.	Tymtran	55	Brand discontinued with no generic equivalents available. NDA 018296 withdrawn FR effective 03/02/1994.

APPENDIX H. Names not likely to be confused due to absence of attributes that are known to cause name confusionⁱ.

No.	Name	POCA Score (%)
1.	Crysti-12	60
2.	Qzytir***	59
3.	Polytar	57
4.	Predator	56
5.	Rymed-Tr	56
6.	Dysport	55
7.	Raphtre	55

ⁱ 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

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SOFANIT N GETAHUN
08/19/2024 01:25:42 PM

VALERIE S VAUGHAN
08/19/2024 01:39:24 PM

IDALIA E RYCHLIK
08/19/2024 02:45:37 PM