

Information Request, July 24, 2013- Eloctate

DEPARTMENT OF HEALTH & HUMAN SERVICES
Public Health Service

Food and Drug Administration
1401 Rockville Pike
Rockville, MD 20852-1448

Our Reference: BL 125487/0

Biogen Idec Inc.
Attention: Ms. Debra Segal
July 24, 2013
Sent by email

Dear Ms. Segal:

We are reviewing your March 7, 2013 biologics license application (BLA) for Antihemophilic Factor (Recombinant), Fc Fusion protein. We are providing the following comments and request for additional information to continue our review:

1. --b(4)-- and Biological Activity: Chromogenic Potency Assay

- a. Please provide the following two reports describing method robustness with respect to analyst, day, instrument, dilution buffer, -b(4)----- plasma and kit lot:
 - o B11-031-2500: Factor VIII-Fc aPTT and Chromogenic Variability Assessment".
 - o TR-QC-000738: Factor VIII Chromogenic AMR from August 2011 to August 2012.

2. Calcium Content by -b(4)---

- a. Please submit SOP PRCD-32233.
- b. In section 5.5 on page 12/27 of the validation report GLI-BII-M101, you state that the range of the assay is "—b(4)-----." Given that Ca weighs 40.078 g/mol, it appears that you are off by a factor of b(4). Please submit a revised validation report.
- c. Relating to section 7.2.2 of the validation report, please provide data to show linearity of calcium response in the product matrix and parallelism between the standard and sample regression lines.

3. -----b(4)-----

- a. ----b(4)-----

- -----

- b. --b(4)-- -----

- c. --b(4)-- -----

- d. --b(4)-- -----

4. **--b(4)--** -----
a. --b(4)-- -----

b. --b(4)-- -----

c. --b(4)-- -----

5. Polysorbate 20 Assay

Please submit the SOP or a detailed procedural description sufficiently detailed to permit replication of the procedure.

6. Residual Moisture

Please submit the SOP or a detailed procedural description sufficiently detailed to permit replication of the procedure. Procedural details should include the following:

- o --b(4)-- -----
- o --b(4)-- -----
- o --b(4)-- -----

The review of this submission is on-going and issues may be added, expanded upon, or modified as we continue to review this submission.

Please submit your response to this information request as an amendment to this file by August 7, 2013 referencing the date of this request.

The action due date for this file is March 8, 2014.

If you have any questions, please contact me at (301) 827-6116.

Sincerely,

Leigh Pracht
Regulatory Project Manager
FDA/CBER/OBRR/DBA/RPMB