



Memorandum

DATE: October 31, 2024

TO: Tolani Ishola, PharmD, RPM, CBER/OTAT/DRPM
Bo Liang, Ph.D., Committee Chair, CBER/OTAT/DCGT
Avanti Golikeri, M.D., Clinical Reviewer, CBER/OTAT/DCEPT

FROM: Benjamin S. Cyge, Ph.D.
Consumer Safety Officer
APLB/DCM/OCBQ

THROUGH: Lisa L. Stockbridge, Ph.D.
Branch Chief
APLB/DCM/OCBQ

SUBJECT: KEBILIDI (eladocagene exuparvovec-tneq)
BLA: 125722/0
Sponsor: PTC Therapeutics

Background

The sponsor submitted:

New Approval
 Changes Being Effected (CBE) supplement
 Prior Approval Supplement (PAS)
 Major Amendment

Submission contains:

Prescribing Information (PI)
 Patient Package Insert (PPI)
 Package and/or container labels
 Other

Submission Date: March 15, 2024

PDUFA Action Date: November 13, 2024

APLB Comments/Recommendations

This is a labeling review for BLA 125722, submitted by PTC Therapeutics, Inc. for KEBILIDI (eladocagene exuparvovec-tneq) on March 15, 2024. KEBILIDI is an adeno-associated virus (AAV) vector-based gene therapy indicated for the treatment of adults and pediatric patients with aromatic L-amino acid decarboxylase (AADC) deficiency.

APLB reviewed the draft prescribing information (PI), dated October 23, 2024, and package and container labels, dated October 29, 2024. The following comments are from a promotional and comprehension perspective.

GENERAL

- Ensure that fonts and formatting are consistent throughout the PI.
- All acronyms must be fully spelled out the first time they are used.

FULL PRESCRIBING INFORMATION

DOSAGE AND ADMINISTRATION

- In section 2.1, the first bullet refers to mutations in “the *DDC* gene.” As this is the first mention of the *DDC* gene in this PI, the *DDC* acronym must be fully spelled out.
 - In section 2.1, the fourth bullet point gives examples of FDA-cleared cannulas for intraparenchymal infusion. These examples (ClearPoint Neuro SmartFlow Cannular Part Number NGS-NC-01-EE or NGS-NC-02-EE) are very specific. If there are other options available that would work for this application, these examples should not be listed, as they suggest practice of medicine. If these are the only parts that will work for this application, then the sentence should not read in a way that suggests the reader has other options. For example, either the sentence should say that FDA-cleared cannulas must be used, or that one of these 2 specific cannulas must be used.
 - In section 2.3, it is stated that KEBILIDI should be used within 6 hours of starting product thaw. This is followed 2 sentences later with “The maximum time from thaw to completion of infusion should be no more than 10 hours.” To avoid confusion, it is recommended that the first statement should be changed from “KEBILIDI should be used within 6 hours” to “KEBILIDI infusion should begin within 6 hours.” The assumption is that the 10 hours comes from the 6 hours mentioned earlier, added to the 4 hours needed for infusion. If this is not correct, there needs to be clarification as to why 6 hours is recommended, but up to 10 hours is acceptable.
 - In step 3 of the directions for preparation of KEBILIDI in Syringe, the PI reads “Open the syringe and label it as the product-filled syringe. We suggest that more specific directions for proper labeling are given. For example, patient identifier, product name, date, etc. These details should also be listed in step 7 and 8, when the directions are given to place the syringe in a plastic bag, and then placement of that bag into a secondary container.
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ADVERSE REACTIONS

We suggest that the list of the most frequently occurring adverse reactions, along with the criteria used to determine inclusion (e.g., incidence rate greater than x%), as written in the HIGHLIGHTS section be inserted between sections 6 and 6.1.

PACKAGE AND CONTAINER LABELS

APLB has no comments on the package and container labels.

If you have any questions regarding this review, please contact Benjamin S. Cyge, Consumer Safety Officer at (301) 796-4212.

Application #:	125722
Firm Name:	PTC Therapeutics
Document Type:	LR

Drafted:	B. Cyge 10/31/2024
Concur:	L. Stockbridge 10/31/2024
Final:	B. Cyge 10/31/2024

Concurrence Box:

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