- 1 titrated to goal if these agents weren't available in a
- 2 fixed-dose combination.
- 3 DR. TEMPLE: Now, how is that different from
- 4 starting on 40, which is what the recommended starting dose
- 5 is, and having stopped that and go buy the 80 milligrams or
- 6 take two of them or something? You think this makes it
- 7 materially worse because stopping the aspirin and going to
- 8 the drug store and getting a few aspirin is really hard.
- 9 DR. NISSEN: Yes, I do.
- DR. BORER: And I would agree with that, and
- 11 I'd even amplify on it but I don't think I have to.
- 12 Tom?
- DR. FLEMING: I'd like to probe on this a bit
- 14 more as well, maybe somewhat along the lines of what Bob
- 15 was just asking.
- Quite frankly, I'm inclined to vote yes in
- 17 question 9 unless there is a substantial reason given in
- 18 question 8 to there being a concern with this packaging,
- 19 and in the context of question 7, the way I've been
- 20 thinking about this is what's this all about. Why are we
- 21 considering this packaging?
- It needs to be at least reasonably well
- 23 motivated that there will be an enhanced likelihood of
- 24 achieving the most favorable benefit-to-risk profile that
- 25 these agents are capable of providing should you have a

- 1 more optimal level of adherence. There needs to be a
- 2 perception or a reality, better than that, that we have
- 3 effective agents here that are being underused and as a
- 4 result, globally we're not achieving the level of clinical
- 5 benefit that they could potentially provide. If that's not
- 6 true, we're done.
- Now, if in fact that's true, and presumably
- 8 that would be argued to be true in the sense that when you
- 9 have a packaged delivery, you're going to make it more
- 10 convenient and you're going to have a higher level of
- 11 consistency and accuracy in the delivery of these doses to
- 12 a larger fraction of the population than currently is
- 13 getting access to this. That's the pro argument and we've
- 14 heard that from the sponsor.
- The con argument that we're hearing that also
- 16 seems to be relevant is there's a "yes but." There are
- 17 circumstances in which this packaged delivery can be
- 18 nonoptimal, examples being there are certain types of
- 19 patients that shouldn't be getting antiplatelet therapy and
- 20 it may be, in fact, not recognized as readily when they are
- 21 taking a single tablet, or maybe they're getting a
- 22 nonoptimal antiplatelet agent. Or it may be that we're not
- 23 achieving an adequate level of targeted goal of lipid
- 24 reduction and it may become less likely that we would have
- 25 an altered dose or altered selection if people are choosing

- 1 this. I see all of those as relevant concerns, but it is
- 2 true, somewhat, that when you label things, or at least
- 3 when you make it as clear as you can that this
- 4 intervention, this particular package combination isn't
- 5 necessarily the right choice for all people, that some of
- 6 these concerns can be offset by intelligent use of this.
- 7 So, what I'm left with in the end is the
- 8 subjective weighing out of what are the benefits that we're
- 9 going to get when we're using it correctly and it's going
- 10 to give an enhanced, widespread use of agents that have
- 11 potential of delivering benefit but they're being
- 12 underutilized against these instances that we've given
- 13 where there are concerns. The fact that there are concerns
- 14 doesn't mean that the benefit-to-risk, so to speak, is
- 15 negative.
- 16 What I'd like to get a sense of from the
- 17 committee is, is there really an unmet need that's
- 18 sufficiently substantial such that if this is more
- 19 convenient, we really will achieve a higher level of
- 20 adherence and thereby a better benefit-to-risk in the
- 21 broadest population, but that there are these concerns and
- 22 in fact they're real but they won't counterbalance the
- 23 benefit, or are these concerns so real that they will give
- 24 us no net gain? That's the answer I'd like to hear.
- DR. BORER: Tom, let me begin responding to you

- 1 by pointing out something. You said get these agents to
- 2 people. I don't believe we're talking about improving
- 3 compliance with two agents. I think we're talking about
- 4 compliance with one agent. The frequency of prescription
- 5 of statins I don't think is going to be altered one bit by
- 6 making this combination available. The associated use of
- 7 aspirin may well be increased. I mean, it may or it may
- 8 not be. I don't know, but it might be. I don't think the
- 9 use of statins is going to be altered at all. So, it may
- 10 be that we might alter the use of aspirin by providing the
- 11 combination.
- I think, though -- and I'd like to hear from
- 13 everybody else to respond to Tom as well -- that the sense
- 14 of the people who have spoken, about this among the voting
- 15 members of the committee, is that perfect is the enemy of
- 16 good, and we don't know what perfect is, and being on some
- 17 statin, if you have any of the conditions for which the
- 18 drug is indicated, is better than being on no statin.
- 19 We're not going to alter the statin part of this equation
- 20 here.
- 21 What we are going to do, however, we believe,
- 22 by limiting the dose range of the combination, is making it
- 23 very likely that people will use this dose even if, left
- 24 unfettered, their judgment would cause them to use
- 25 different doses for targets that they may wish to achieve

- 1 based on clinical guidelines or whatever else. And it's
- 2 not that they couldn't make the change, but that it becomes
- 3 so inconvenient and costly to make the change that they're
- 4 unlikely to do it and that the patients may not benefit
- 5 from that.
- 6 Now, Beverly and Steve and the others here,
- 7 maybe you may want to add to that.
- 8 DR. NISSEN: Well, I think you said it very
- 9 well. Tom, let me see if I can help you with this.
- There are two sides to this equation. Will the
- 11 combination improve safety or make safety more of a
- 12 concern? We're talking about weighing, pluses and minuses.
- 13 I think for that one it's pretty clear to me that the
- 14 likelihood that people will get aspirin inappropriately and
- 15 therefore raise a safety problem goes up not down. I think
- 16 the likelihood that a primary prevention patient who
- 17 shouldn't get aspirin will and the chances that a patient
- 18 will get aspirin when having a surgical procedure that
- 19 shouldn't will are both worse with the combination. So, on
- 20 the safety side, it's not a plus.
- 21 What about efficacy? Efficacy would mean that
- 22 more patients that ought to have co-administered aspirin
- 23 would and that more patients would be more likely to get to
- 24 those lipid targets that we've spent the last 7 or 10 years
- 25 trying to get people to follow. And I have concerns that

- 1 the net balance on the efficacy side will be worse. Yes, a
- 2 few more patients may get aspirin, but the burden of then
- 3 having to go through this process of stopping a combination
- 4 product, switching to a different statin, and
- 5 co-administering aspirin will be enough of an impediment in
- 6 primary care and in other settings that fewer patients will
- 7 actually get to the goals that we want, and so therefore,
- 8 this combination will have an adverse effect on overall
- 9 efficacy.
- 10 So, I think for me it loses on the safety side
- 11 and it loses on the efficacy side.
- DR. THOMPSON: Jeff, I'm a non-voting member,
- 13 but can I comment?
- DR. BORER: Yes, sure, Paul.
- DR. THOMPSON: Because I'd like to make two
- 16 comments.
- 17 First of all, I always tell people that there
- 18 are two devils in this world. There's the devil you know
- 19 and there's the devil you can speculate about. When we
- 20 look at the devil we know and we look at slide D-13, we see
- 21 that among those patients -- now, this is 1999 data -- with
- 22 known cardiovascular disease, only 51 percent reported that
- 23 they were taking aspirin or an equivalent. So, that's a
- 24 large gap. And we also know that 15 percent of those who
- 25 said they were taking aspirin were taking something else.

- 1 They were taking a non-aspirin compound. So, I think we're
- 2 actually speculating a fair amount about things that are
- 3 possible, devils that we're actually imagining, as opposed
- 4 to facing devils that we can see and have data in.
- Now, a couple other small comments. We're
- 6 talking a lot about the safety of withdrawing a statin, for
- 7 example. I do that in my lipid clinic all the time because
- 8 people always doubt whether the statin is responsible for
- 9 their effect. So, I stop it to show them that indeed the
- 10 statin was effective.
- 11 We're also talking about the negative stuff of
- 12 aspirin in primary preventions. Well, it's news to me.
- 13 It's one of the few things I do for myself. I think most
- 14 cardiologists do take aspirin for primary prevention. So,
- 15 perhaps there's some data that wasn't presented that I
- 16 didn't know.
- 17 Then finally, what I always do and I tell my
- 18 children to do when I have to make a decision is I make up
- 19 a list of pros and cons, and I'm glad to share that with
- 20 you, if you'd like. But I've listened to the cons during
- 21 the day that aspirin might be taken by those who are at
- 22 risk to bleed, and there are all those sorts of risks. But
- 23 when you take and you make up your benefit-risk thing, even
- 24 with the fact that convenience for a patient is a benefit
- 25 -- I thought this was actually a slam dunk when I read this

- 1 stuff at home before coming here. I had no idea.
- But when you look at the pros and the cons, I
- 3 find it hard to worry so much about these devils unknown as
- 4 opposed to the devils we actually see in the data and the
- 5 efficacy of the combination shown from the meta-analysis,
- 6 which we all agreed that we liked.
- 7 I'll go through my pros and cons, but I don't
- 8 want to take more time. I'm a nonvoting member, but I've
- 9 listed to everything such as that you lack flexibility.
- 10 But that lack of flexibility with a 40 milligram dose may
- 11 get doctors start with 40 milligrams as opposed to 20
- 12 milligrams. So, for most of the things we've talked about
- 13 as a negative, there's also the potential benefit.
- 14 No data on aspirin effect when given together,
- 15 but actually we do have some data. It looks like it
- 16 decreases the event rates. And this was the stuff on
- 17 platelets. In other words, people were talking about the
- 18 fact that there was no effect on the platelet effect.
- 19 Well, there's no in vitro studies, but there are in vivo
- 20 studies showing that that combination looked better. Now,
- 21 if you give me a choice between some Bademan's platelet
- 22 chamber versus some human being, I'm going to take the
- 23 human being studies.
- So, I've listened to the two sides of it, but
- 25 I'm surprised a little bit.

- DR. BORER: Tom, did you have some comments
- 2 here?
- 3 DR. FLEMING: Jeff and Steve, I wanted to just
- 4 follow up for clarification on your insights.
- 5 I understand, Jeff, from what you're saying is
- 6 that you see the most substantive impact of this would be
- 7 potentially increased adherence to the aspirin, that the
- 8 lipid-lowering intervention will essentially, in terms of
- 9 its overall coverage, largely stay the same.
- DR. BORER: Yes. Anything else would have to
- 11 be a result of marketing, and I don't think we can make any
- 12 guess about the impact of marketing, how it's going to be
- 13 done, or whatever. But logically there should be no impact
- 14 on the use of the statin. It really should be only on the
- 15 impact of the use of the aspirin.
- DR. FLEMING: So, if I go with that, Steve,
- 17 what I heard was a concern in terms of the safety side in
- 18 particular being that if there isn't an as flexible an
- 19 adjustment of the regimen for a lipid-lowering agent, that
- 20 could have adverse effects on efficacy and safety.
- DR. NISSEN: No, I'm sorry. The safety issue
- 22 related to the aspirin. I'm very comfortable with the
- 23 safety of pravastatin and, frankly, the other statins as
- 24 well.
- DR. FLEMING: All right. So, basically it

- 1 would be a concern about potential loss of efficacy on the
- 2 lipid-lowering side, the statin side. When we see data, as
- 3 we were just referred to, D-13, and we see estimates of
- 4 about 50 percent underuse of aspirin, even though I
- 5 appreciate that there are settings you've described where
- 6 aspirin use could be inappropriate and hence larger use
- 7 could lead to then some instances of adverse effects, if it
- 8 truly is 50 percent, isn't the up side for increased
- 9 adherence to aspirin far greater than the down side?
- 10 DR. BORER: I don't know. I really don't know.
- 11 First of all, we have no idea what the impact on aspirin
- 12 use would be. We heard that in Sweden there wasn't much
- 13 impact, not that those are primary data, and yes, this is a
- 14 convenience product.
- DR. FLEMING: I am persuaded by what was said
- 16 earlier and that is if you make this available and it's not
- in fact used, then that's a marketing issue. That's not an
- 18 issue as to whether this had the potential of providing
- 19 benefit. In fact, there's no harm, in a sense, done if you
- 20 make this available and no one uses it. We just didn't
- 21 provide any benefit.
- 22 My concern is if we make this available and it
- 23 is used, is this in fact going to achieve more net benefit
- than harm, and the benefit would allegedly be, if I focus
- 25 on the way you think this is going to go, Jeff, it has the

- 1 potential at least of substantially increasing adherence to
- 2 aspirin which, if we believe the efficacy data, has the
- 3 potential of providing meaningful benefit on major events.
- 4 But then there is the offsetting aspect that in some of
- 5 these cases, there may be some safety concerns, and in the
- 6 lipid-lowering case, there may be lack of as effective
- 7 adjustments that could provide some offsetting.
- 8 So, is that the benefit-to-risk that we would
- 9 have to say when we --
- DR. BORER: As far as I'm concerned, you've
- 11 pretty much noted the elements, and I would go one step
- 12 further. I'd be a lot happier, because I think the problem
- 13 would be obviated, if the sponsor provided pravastatin at
- 14 several doses with aspirin attached to it so that I could
- 15 give the dose that I want to give.
- 16 DR. NISSEN: We don't know what percent of that
- 17 50 percent not on aspirin also require co-administration of
- 18 stating. You understand that that data is not statin data.
- 19 That's aspirin data. So, there's an unknown here, and
- 20 that is how many of those people would be even eligible for
- 21 a combination product, and we have not been provided with
- 22 any information about that.
- 23 DR. FLEMING: A very important point. Is there
- 24 anybody that has that data? If this 50 percent doesn't
- 25 apply to our population and we need to know what percent of

- 1 the people on statins are not using aspirin, which is very
- 2 relevant.
- 3 DR. ARTMAN: Just go back to D-10, the sponsor
- 4 showed us data from 167,000 patients who had had an MI at
- 5 discharge, and 77 percent of them were receiving aspirin
- 6 and only 37 percent were receiving statins. So, I don't
- 7 see this as an underutilization of aspirin. I see it as an
- 8 underutilization of statins. And I think the sponsor is
- 9 probably not going to go out promoting aspirin. They're
- 10 going to go out promoting pravastatin.
- 11 DR. BORER: Which they could do anyway.
- 12 DR. ARTMAN: Which they could do anyway.
- 13 You know, this was prefaced to us with this
- 14 treatment gap and it's a public health issue, and it's not
- 15 because the drugs aren't available. These drugs are
- 16 available. It's educating the physicians and, these days,
- 17 educating the consumers directly. So I think, Tom, this
- 18 maybe is more reflective of the proper patient base.
- 19 DR. FLEMING: I was going to throw something
- 20 out here because part of where I'm struggling here is I
- 21 prefer to be looking at quantitative results and we're
- 22 having to speculate and that's somewhat unavoidable.
- 23 We had data presented to us which wasn't
- 24 certainly as reliable as what we would have had from
- 25 randomized trials, but it's the best evidence at least that

- 1 I have that I can use in a subjective judgment here that
- 2 says you're going to have on the order of 25 to 33 percent
- 3 reduction in major events with proper administration of
- 4 these interventions. If in fact making an intervention
- 5 that's more convenient does allow for a 25 percent -- and
- 6 that's a pretty substantial increase -- but a 25 percent
- 7 increase in adherence from 50 to 75 or whatever, that leads
- 8 to what one could at least speculate a pretty substantial
- 9 reduction in the overall rate of occurrence of some of
- 10 these events.
- 11 On the other hand, there are these down sides
- 12 that occur that relate to safety. It has to be a pretty
- 13 strong argument I would think, though, that those down
- 14 sides would be so substantial that they could offset this
- 15 potential for a very substantial gain by having greater
- 16 adherence to effective agents.
- DR. BORER: To preempt Beverly for just one
- 18 second here and to try to answer your question, I can't
- 19 answer the question.
- 20 As it was presented, I recognized the same
- 21 concern that Steve just verbalized, that is, that we were
- 22 shown the gap for all aspirin users. If you look at the
- 23 data in the book from LIPID and CARE -- it may not be
- 24 representative but that's what we've got -- pages 14 and 16
- 25 in the briefing book, patients were randomized to

- 1 pravastatin or placebo. They may have been on aspirin. 83
- 2 percent of the patients in LIPID were on aspirin; 84
- 3 percent of the patients in CARE were on aspirin. That's a
- 4 gap of 16 to 17 percent, not 49 percent.
- 5 And I'll tell you my opinion. I can't
- 6 substantiate it. My opinion. Once somebody is taking a
- 7 statin drug, their perception of the importance of drug-
- 8 taking is heightened, and I think it would be more likely
- 9 rather than less likely that they would take their
- 10 concomitant aspirin. I don't know if that's true or not,
- 11 but that's the way I would interpret these data.
- DR. FLEMING: Let me reiterate my question then
- 13 from five minutes ago, which is if it's appropriate to
- 14 suggest that this 50 percent underuse of aspirin isn't
- 15 relevant to our context, we need to know, in the context of
- 16 somebody who would be on lipid-lowering agents, what is our
- 17 best estimate of that. I understand, from the clinical
- 18 trials for aspirin, when you have people joining a clinical
- 19 trial to be randomized to a lipid-lowering agent, 80
- 20 percent were using aspirin, but does that represent the
- 21 real world, which was my question. And then we had
- 22 reference to data from D-10.
- 23 DR. HIRSCH: Tom, you're not going to get an
- 24 answer to your question. There are various surveys with
- 25 various aspirin use rates in different populations, and you

- 1 can quote figures from 50 to 90 percent. Somewhere between
- 2 70 and 80 percent is probably accurate. And you're not
- 3 going to be able to make your decision based on that.
- 4 Although you'd like that hard data, sorry, you're not going
- 5 to get it today.
- 6 And I'm going to charge in and make an
- 7 impassioned plea here. I'm someone, Tom, who also deals
- 8 with this public health issue of use or not use and filling
- 9 the gap in underuse of medications. I'm a little surprised
- 10 at us today. I'm a little surprised that we're going to
- 11 try to make a decision at this last minute to try to fill
- 12 this gap with this single product combination because any
- 13 hope of us changing the outcome of use of aspirin and
- 14 lipid-lowering agents in America with this decision -- that
- 15 happens with very long, large-scale NIH, American Heart
- 16 Association 5- and 10-year, Healthy People 2010 plans. It
- doesn't happen in a deliberation like this.
- 18 I would like to constrain the conversation a
- 19 little bit and bring it back down to, again like you were
- 20 saying earlier, is there some evidence of efficacy, what is
- 21 the safety issue, and do we think physicians can prescribe
- 22 more or less appropriately, never perfectly.
- 23 And with that, Bev, go ahead.
- DR. LORELL: Thank you.
- 25 I think that in thinking about the data that

- 1 we've seen today, we've seen very compelling data from the
- 2 meta-analysis that the use of Pravachol plus aspirin is
- 3 efficacious. But I think a very interesting point is that
- 4 the use of aspirin in the trial data that we have to look
- 5 at to make our decision was discretionary. It was a high
- 6 frequency of use that we saw, but it was discretionary and
- 7 what people were really doing in those trials was taking
- 8 two separate pills.
- 9 I am concerned about the issue that having a
- 10 single fixed dose carries a risk, as was put well by one of
- 11 my colleagues, of increasing the likelihood of under-
- 12 treatment with statins, but I think that my much larger
- 13 concern that I had not even thought about until I heard the
- 14 discussions today, is the very real risks of packaging a
- 15 potent antiplatelet agent with something else. And I would
- 16 go on record as saying that I have grave concern about
- 17 packaging aspirin, clopidogrel, or any other antiplatelet
- 18 agent with anything, whether it be a beta-blocker, an ACE
- 19 inhibitor, you name it. I use these drugs every day in
- 20 very high-risk patients. Aspirin is a powerful drug. It
- 21 carries risks of bleeding. Patients and doctors have to be
- 22 extremely attentive to its use and the subtle nuances of
- 23 when to temporarily stop and when to restart it. So, I
- 24 think my largest concern is I don't think the issue of
- 25 convenience is outweighed by the very real risk and lack of

- 1 data about packaging a potent antiplatelet with something
- 2 else. To me that's a very major issue.
- DR. BORER: Blase, do you have any last comment
- 4 here?
- DR. CARABELLO: No.
- DR. BORER: Then let's move on to question 9.
- 7 We'll go around the table because this is a vote that has
- 8 to be counted, and we have to have a verbal statement.
- 9 Do you recommend approval of a fixed-dose
- 10 combination product of pravastatin plus buffered aspirin --
- 11 I assume the product that we've been given, which is the
- 12 doses -- yes, right?
- DR. LIPICKY: Yes.
- 14 DR. TEMPLE: Jeffrey, one thing. We didn't
- 15 think of this. You ought to address the question of
- 16 whether it would be different if they made it available
- 17 with two doses of pravastatin, which they may not want to
- 18 do, but which is certainly possible.
- 19 DR. BORER: Alan, why don't you start?
- 20 DR. HIRSCH: Am I'm allowed, Bob, to answer
- 21 your first question first? I mean your dosing question.
- 22 Say yes.
- DR. LIPICKY: [Inaudible.]
- DR. BORER: Why don't we answer this one first?
- 25 Then we'll go around the room and ask the second one.

- DR. TEMPLE: That would be okay. Would your
- 2 answer be different if they had an 80?
- 3 DR. LIPICKY: If you say no, then you can ask
- 4 what if you had two doses of pravastatin, would that be
- 5 good?
- DR. HIRSCH: I'll need to explain later. I'll
- 7 say no.
- DR. BORER: Let's start with Dr. Kreisberg.
- 9 DR. KREISBERG: No.
- DR. LORELL: No.
- 11 DR. BORER: That was a no from Beverly.
- 12 Susanna?
- DR. CUNNINGHAM: No. I'd really like to have
- 14 the information that allowed me to vote differently. I
- 15 would like to know that this was safe and that people
- 16 wouldn't be put in trouble, and I'd like to know that this
- 17 actually helped people to take their drugs more. We don't
- 18 have that information. I'd like to have something that
- 19 says if it were available as a combined, one, people would
- 20 take it more often. I don't have that. I hate having to
- 21 guess, and so I'm going to say no.
- DR. BORER: Mike?
- DR. ARTMAN: No.
- DR. BORER: Tom?
- 25 (Pause.)

- DR. KREISBERG: Yes or no.
- 2 (Laughter.)
- DR. FLEMING: Well, there is a third and I'll
- 4 take that option. I'm to abstain from this. I actually
- 5 was inclined to vote yes, and I've been persuaded by a lot
- 6 of comments over the last 20 minutes that this is extremely
- 7 difficult.
- 8 Basically my sense is that if it is, as I would
- 9 have thought, much more plausible than I'm hearing, that we
- 10 really would enhance the overall adherence, then I would
- 11 think that the potential for benefit exceeds the very real
- 12 and relevant concerns. But what I'm hearing from my
- 13 clinical colleagues, who have much better insight than I do
- 14 about the actual real-world reality of this, is it's not
- 15 very likely we're going to have enhanced adherence, and if
- 16 that's the case, then I don't believe that it would be a
- 17 positive step. So, in the absence of being able to make an
- 18 informed judgment about that, I think I'm going to abstain.
- DR. BORER: Blase?
- DR. CARABELLO: Yes.
- DR. BORER: Steve?
- DR. NISSEN: No.
- DR. BORER: And I'll vote no. So, we have 7
- 24 no, 1 yes, 1 abstain.
- Now let's go on to the next issue, which is the

- one that Bob just asked, and I'm going to change the
- 2 question just a little bit. What if we had not two doses
- 3 but a broader range of pravastatin doses? I don't want to
- 4 pick the doses, but what if we had a broader range of
- 5 pravastatin doses available together with aspirin? Would
- 6 that change the vote?
- 7 Alan, why don't you start?
- DR. HIRSCH: Yes, and the reason is because
- 9 pravastatin is safe and effective, aspirin is effective and
- 10 rather safe. Actually the biobehavioral issues of how
- 11 patients take drugs and physicians prescribe them are the
- 12 main ghost in the room. That's what this is all about.
- 13 For that, I think with a dose range, I would certainly have
- 14 voted yes.
- 15 DR. KREISBERG: I'll vote no and the reason
- 16 that I'll vote no is that the only alternate dose is 80
- 17 milligrams, at least that's what I'm hearing. And that
- 18 adds an additional 3 percent LDL cholesterol lowering, and
- 19 consequently I don't think that's enough of a therapeutic
- 20 option to make that an attractive one. So, my answer is
- 21 no.
- DR. BORER: Beverly?
- 23 DR. LORELL: I would answer no too. I think it
- 24 still does not address the issue of potential increasing
- 25 the probability of undertreatment. We were shown no data

- 1 addressing that.
- 2 And secondly, I still have a major concern
- 3 about combining, in a fixed-dose combination, with any
- 4 other drug an antiplatelet agent.
- DR. BORER: Susanna?
- DR. CUNNINGHAM: No, because it doesn't change
- 7 the issues I'm concerned with.
- 8 DR. BORER: Mike?
- 9 DR. ARTMAN: Yes, I would say no as well. I
- 10 think that again as sort of a clinical pharmacologist, this
- 11 really goes against one of the principles of rational drug
- 12 therapy and that is to try and tailor your therapy to each
- 13 individual patient. And that may change on a month-to-
- 14 month basis in that given patient.
- The other issue is related to the compliance
- 16 issue. For those who have tried to study compliance in
- 17 populations who are taking a medication that really doesn't
- 18 make them feel any different, compliance is a very
- 19 difficult issue. It's very complicated. And the inference
- 20 is that just because this patient who is taking four or
- 21 five drugs now will take three or four drugs instead of
- 22 four or five will have better adherence to their regimen I
- 23 think is just a lot of hand-waving. There are absolutely
- 24 no data to support that, and I think this is the wrong way
- 25 to go.

- DR. BORER: Tom, you already abstained from
- 2 number one. Do you want to abstain from two?
- 3 DR. FLEMING: Yes.
- DR. BORER: And Blase, you said yes the first
- 5 time. So, that's not an issue.
- 6 Steve?
- 7 DR. NISSEN: No.
- DR. BORER: Alan? I'm sorry. Alan already
- 9 said --
- DR. HIRSCH: I did but I could change my mind
- 11 if you like.
- 12 (Laughter.)
- DR. BORER: No, no.
- I have a very difficult time with this
- 15 question. I think that it would be reasonable to approve a
- 16 combination of these two products as a convenience as long
- 17 as the uncombined drugs remained available and as long as a
- 18 range of doses and combinations sufficient to suit my
- 19 purposes as a prescriber were met.
- 20 I agree fully with what Bev said. I am
- 21 concerned about potential problems associated with adding
- 22 an antiplatelet drug that might not be used appropriately
- 23 because it's attached to something that the patient may not
- 24 remember about. But I think I might be able to deal with
- 25 that or someone might be able to deal with that in certain

- 1 situations. And the convenience of having that available
- 2 might outweigh my concern in some situations. What I was
- 3 not happy about with the drug that was proposed was that it
- 4 limited my capacity to manipulate cholesterol the way I
- 5 might choose to do it.
- 6 So, while I still have the safety concerns that
- 7 have been raised here, and I agree fully with Mike's
- 8 comment that I don't think the right way to give drugs is
- 9 in fixed combinations, that you should titrate individually
- 10 and be able to change doses individually, nonetheless I
- 11 think the convenience of having the two pills in one would
- 12 be reasonable and would be sufficient to outweigh my
- 13 concerns about safety for approvability as long as my
- 14 capacity to prescribe the doses I want to prescribe wasn't
- 15 limited. So, I would vote sort of a tepid yes on this last
- 16 question.
- So, I don't think we have to take a big tally
- 18 on that one. It's not one of the official questions here.
- 19 DR. TEMPLE: But you did take a tally, didn't
- 20 you?
- DR. BORER: Well, we have everybody's answer.
- 22 Do you want me to summarize it for you? We have 3 yeses, 5
- 23 noes, and 1 abstain.
- 24 DR. TEMPLE: It's late to point out what I'm
- 25 going to point out, and we obviously should have built it

- 1 into the questions. But you may recall that aspirin is
- 2 available as an over-the-counter drug and whether people
- 3 take it and under what circumstances they take it and
- 4 whether their doctor knows they're taking is is not exactly
- 5 a known quantity at the present time. I don't know if that
- 6 makes any difference, and we really didn't mention it. But
- 7 that seems to have something to do with how much anxiety
- 8 one should have about someone taking aspirin when he
- 9 shouldn't. I mean, they already are.
- DR. BORER: Not to me, for the reasons that
- 11 Beverly verbalized very well.
- I think that we've completed our responses.
- 13 We'll call the meeting adjourned.
- 14 (Whereupon, at 3:05 p.m., the committee was
- 15 adjourned.)

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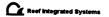
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