

U.S. FOOD AND DRUG ADMINISTRATION

+ + + + +

CLINICAL CHEMISTRY AND CLINICAL TOXICOLOGY

DEVICES PANEL

OF THE

MEDICAL DEVICES ADVISORY COMMITTEE

+ + + + +

MEETING

+ + + + +

WEDNESDAY,

DECEMBER 6, 2006

+ + + + +

The meeting convened at 8:00 a.m.
at the Holiday Inn Gaithersburg, Two
Montgomery Village Avenue, Gaithersburg,
Maryland, Bernard W. Steele, M.D.,
Chairperson, presiding.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

PRESENT:

BERNARD W. STEELE, M.D. Chairperson

CINDY L. GRINES, M.D. Consultant

ANN M. GRONOWSKI, Ph.D. Voting Member

STANLEY S. LEVINSON, Ph.D. Consultant

MURRAY H. LOEW, Ph.D. Consumer

Representative

SANTICA M. MARCOVINA, Ph.D. Consultant

ALAN T. REMALEY, M.D., Ph.D. Voting Member

ROBERT D. SHAMBUREK, M.D. Consultant

MICHAEL Y. TSAI, Ph.D. Consultant

KAROL E. WATSON, M.D., Ph.D. Consultant

WILLIAM E. WINTER, M.D. Consultant

THOMAS E. WORTHY, Ph.D. Industry

Representative

RUIWEN ZHANG, M.D., Ph.D. Voting Member

FDA PARTICIPANTS:

VERONICA J. CALVIN, M.A. Executive Secretary

ALBERTO GUTIERREZ, Ph.D. Director, Division

of Chemistry and Toxicology

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

FDA PARTICIPANTS (continued):

STEVE GUTMAN, M.D., M.B.A. Director, Office
of In Vitro Diagnostics

CAROL C. BENSON, MT(ASCP), M.A. Associate
Director for Chemistry

COURTNEY D. HARPER, Ph.D. Associate Director
for Toxicology

DOUGLAS WOOD, MT(ASCP) MCSE Division of
Chemistry and Toxicology

GUEST PRESENTER:

PARVIN P. WAYMACK, Ph.D. Research Chemist,
Centers for Disease Control and Prevention

PUBLIC SPEAKERS:

RUSSELL G. WARNICK Berkeley HeartLab, Inc.

KENNETH FRENCH Atherotech, Inc.

NEHEMIAS MUNIZ Quantimetrix Corporation

SAMIA MORA, M.D., M.H.S. Harvard Medical
School

JAMES OTVOS, Ph.D. LipoScience, Inc.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

GUEST SPEAKERS (continued):

H. ROBERT SUPERKO, M.D. Fuqua Heart Center
for Prevention, Piedmont Hospital

WILLIAM CROMWELL, M.D. Medical Director,
Division of Lipoprotein Disorders,
Presbyterian Center for Preventive
Cardiology, and Wake Forest University
School of Medicine

PAUL ZIAJKA, M.D., Ph.D. Director, The
Florida Lipid Institute and Chief Medical
Officer, Atherotech

HERBERT K. NAITO, Ph.D., M.B.A. NorthStar
Consulting Service

ELIZABETH SCHILLING, CRNP University of
Maryland Medical Center

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

C-O-N-T-E-N-T-S

<u>AGENDA ITEM</u>	<u>PAGE</u>
CALL TO ORDER	6
PANEL INTRODUCTIONS	7
CONFLICT OF INTEREST STATEMENT	11
DIVISION UPDATES:	
Carol Benson, Chemistry	15
Courtney Harper, Toxicology	22
CRITICAL PATH INITIATIVE	N/A
OPEN PUBLIC HEARING	33
GUEST PRESENTATION	90
QUESTIONS AND ANSWERS	125
FDA PRESENTATION	136
QUESTIONS AND ANSWERS	162
PANEL DELIBERATIONS	177
OPEN PUBLIC HEARING	207
PANEL RESPONSE TO FDA QUESTIONS	298

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 P-R-O-C-E-E-D-I-N-G-S

2 (8:09 a.m.)

3 CALL TO ORDER

4 DR. STEELE: Good morning.

5 I would like to call this meeting
6 of the Clinical Chemistry and Clinical
7 Toxicology Devices Panel to order.

8 My name is Dr. Bernard Steele. I
9 am the chairperson of the Clinical Chemistry
10 and clinical Toxicology Devices Panel.

11 I am a clinical chemist and
12 toxicologist, and I am the director of the
13 Core Laboratory at Jackson Memorial
14 Hospital, a 1,500-bed county hospital in
15 Miami Dade, Florida. And I am the director
16 of the driving-under-the-influence
17 laboratory for the County Miami Dade.

18 I am also a member of the
19 University of Miami School of Medicine.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 If you haven't done so already,
2 please sign the attendance sheets that are
3 on the tables by the doors, and I will note
4 for the record that the voting members
5 present constitute a quorum, as required by
6 21 CFR Part 14.

7 At this time, I will ask the
8 panel members to introduce themselves, give
9 their area of expertise, position, and
10 affiliation. I will start at the corner
11 with Dr. Gutierrez.

12 PANEL INTRODUCTIONS

13 DR. GUTIERREZ: I'm Alberto
14 Gutierrez. I'm the division director for
15 chemistry and toxicology in the Office of In
16 Vitro Diagnostics at CDRH.

17 Dr. LOEW: I'm Murray Loew, the
18 consumer representative, and a faculty
19 member in electrical and computer
20 engineering and biomedical engineering at
21 George Washington University.

22 DR. GRINES: I'm Cindy Grines.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 I'm an interventional cardiologist at
2 William Beaumont Hospital.

3 DR. WINTER: I'm William Winter.
4 I'm a professor of pathology and pediatrics
5 at the University of Florida. My background
6 is clinical chemistry and pediatric
7 endocrinology.

8 DR. WATSON: I'm Karol Watson.
9 I'm a cardiologist at UCLA, and director of
10 the Center for Cholesterol and Hypertension
11 Management there.

12 DR. LEVINSON: Hi, I'm Stanley
13 Levinson, and I'm a professor of pathology
14 and laboratory medicine at the University of
15 Louisville, and I'm chief of clinical
16 chemistry at the Louisville VA Hospital.

17 DR. REMALEY: My name is Alan
18 Remaley. I'm a clinical chemist at the
19 National Institutes of Health. And I do
20 research at the Heart Lung and Blood
21 Institute on HDL metabolism.

22 DR. TSAI: I'm Michael Tsai. I'm

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 a professor at the University of Minnesota
2 in the Department of Laboratory Medicine and
3 Pathology, and I do research in the
4 cardiovascular disease area.

5 DR. MARCOVINA: My name is Santica
6 Marcovina. I'm a professor of medicine at
7 the University of Washington in Seattle, and
8 I'm director of the Northwest Lipid
9 Metabolism and Diabetes Research
10 Laboratories.

11 DR. SHAMBUREK: I'm Bob Shamburek.
12 I'm with the intramural NHLBI. My area
13 interest is lipids and in vivo lipoprotein
14 metabolism.

15 DR. ZHANG: I'm Ruiwen Zhang. I'm
16 a toxicologist certified by American Board
17 of Toxicology. I'm a professor of
18 pharmacology, kinetopharmacology and
19 toxicology, at the University of Alabama at
20 the Birmingham School of Medicine.

21 Also I'm the director of cancer
22 and pharmacology over there. I'm

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 responsible for kinetic (phonetic)
2 pharmacology, toxicology and clinical trials
3 over there.

4 DR. GRONOWSKI: I'm Ann Gronowski.

5 I'm an associate professor at Washington
6 University School of Medicine in St. Louis.

7 I am a clinical chemist with a
8 specialist in endocrinology and reproductive
9 physiology.

10 DR. WORTHY: I'm Tom Worthy. I'm
11 the industry representative. I'm a
12 consultant on in vitro diagnostics. My
13 background is in lipid chemistry and amino
14 assay.

15 DR. STEELE: Okay, at this moment
16 I have a couple of announcements or pieces
17 of information.

18 For the panel, please turn off
19 your mikes when you are done. And two, we
20 can only have four mikes on at one time, so
21 please turn them off when you are done.

22 The second thing is, for the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 audience there will be no outbursts.

2 And finally I would like to
3 remind you, take a moment right now and take
4 out your cell phone and turn it off, or any
5 other device you might have. It would be
6 much appreciated by everyone.

7 Ms. Calvin here is the executive
8 secretary, and would like to make some
9 introductory remarks.

10 CONFLICT OF INTEREST STATEMENT

11 MS. CALVIN: I will read into the
12 record the conflict of interest statement.

13 The Food and Drug Administration
14 is convening today's meeting of the clinical
15 chemistry and clinical toxicology devices
16 panel of the Medical Devices Advisory
17 Committee under the authority of the Federal
18 Advisory Committee Act of 1972.

19 With the exception of the
20 industry representative, all members and
21 consultants of the panel are special
22 government employees or regular federal

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 employees from other agencies, and are
2 subject to the federal conflict of interest
3 laws and regulations.

4 The following information on the
5 status of this panel's compliance with
6 federal ethics and conflict of interest laws
7 covered by, but not limited to, those found
8 at 18 USC 208 are being provided to
9 participants in today's meeting and to the
10 public.

11 FDA has determined that members
12 and consultants of this panel are in
13 compliance with federal ethics and conflict
14 of interest laws.

15 Under 18 USC 208, Congress has
16 authorized FDA to grant waivers to special
17 government employees who have financial
18 conflicts when it is determined that the
19 agency's need for a particular individual's
20 services outweighs his or her potential
21 financial conflict of interest.

22 Members and consultants of this

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 panel who are special government employees
2 have been screened for potential financial
3 conflicts of interest of their own as well
4 as those imputed to them including those of
5 their employer, spouse, or minor child
6 related to the discussions of today's
7 meetings.

8 These interests may include
9 investments, consulting expert witness
10 testimony, contracts, grants, CRADAS,
11 teaching, speaking, writing, patents and
12 royalties, and primary employment.

13 Today's agenda involves a
14 discussion of general issues concerning
15 lipoprotein, HDL and LDL subfraction assays.

16 Based on the agenda for today's meeting and
17 all financial interests reported by the
18 panel members and consultants, no conflict
19 of interest waivers have been issued.

20 Dr. Thomas Worthy is serving as
21 the industry representative, acting on
22 behalf of all related industry, and is

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 employed by Worthy Consulting.

2 Dr. Parvin Waymack, who is a
3 guest speaker with us today, has
4 acknowledged scientific collaborations with
5 firms at issue.

6 This conflict of interest
7 statement will be available for review at
8 the registration table during this meeting,
9 and will be included as part of the official
10 transcript.

11 We would like to remind members
12 and consultants that if the discussions
13 involve any other products or firms not
14 already on the agenda for which an FDA
15 participant has a personal or imputed
16 financial interest, the participants need to
17 exclude themselves from such involvement,
18 and their exclusion will be noted for the
19 record.

20 FDA encourages all other
21 participants to advise the panel of any
22 financial relationships that they may have

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 with any firms at issue.

2 Thank you.

3 Before I turn it back over to Dr.
4 Steele, I would just like to remind you that
5 transcripts of today's meeting will be
6 available from Neal Gross & Company. Their
7 contact information can be found on the
8 table outside the meeting room.

9 Also information on purchasing
10 videos of today's meeting is also outside on
11 the table.

12 Presenters to the panel who have
13 not already done so should provide FDA with
14 a hard copy of their remarks, including any
15 overheads.

16 Dr. Steele.

17 DR. STEELE: Next, Ms. Carol
18 Benson, associate director for chemistry,
19 followed by Dr. Courtney Harper, associate
20 director for toxicology, will give division
21 updates.

22 DIVISION UPDATES - CHEMISTRY

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 MS. BENSON: Good morning. My
2 name is Carol Benson, and I'm the associate
3 director in chemistry branch in the
4 Chemistry and Toxicology Division.

5 Today I'd like to give some
6 updates of happenings in the chemistry
7 branch on newborn screening, diabetes,
8 cardiovascular disease, asthma, on CLIA, and
9 safety.

10 When there is no predicate
11 device, the device is automatically
12 classified into class III. FDA can use the
13 de novo process to classify a Class III
14 device into Class I or II for special
15 controls.

16 In August of 2004 FDA used the de
17 novo process to classify a device for
18 newborn screen, the Neogram amino acid
19 caritine and acylcarnitines tandem mass
20 spectrometry kit into Class II.

21 Likewise, in May of 2005 our
22 sister branch, Immunology, classified a

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 device for gene mutation detection for
2 cystic fibrosis into Class II with special
3 controls.

4 And in January of 2006 this year
5 another device was cleared for gene mutation
6 detection for cystic fibrosis.

7 In the area of diabetes, recently
8 we have revised the guidance for whole blood
9 glucose monitors, and that is available on
10 our OIVD web page.

11 Also on the OIVD web page are
12 alerts about diabetes, blood glucose
13 monitors, such as counterfeit reagent
14 strips, and falsely elevated glucose results
15 due to interferences of maltose galactose,
16 and oral d-xylose solutions.

17 We have had some PMA approvals
18 for Class III devices with continuous
19 monitoring sensors. The two companies are
20 the Medtronic and the Dexcom.

21 We've been involved with
22 initiatives through the Juvenile Diabetes

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Research Foundation and their efforts to
2 promote research on the development of
3 technology for diabetes monitoring, and
4 their desire to make this technology more
5 widely available.

6 In the cardiovascular area two
7 new analytes were cleared for use, the
8 diaDexis PLAC test and the CardioMPO test.

9 The indications for use for the
10 PLAC test is that is an immunoassay for the
11 quantitative determination of the
12 lipoprotein associated phospholipase A-2 in
13 human plasma to be used in conjunction with
14 clinical evaluation and patient risk
15 assessment, as an aid in predicting risk for
16 coronary heart disease.

17 The CardioMPO test has an
18 indications for use that it is intended for
19 the quantitative determination of
20 myeloperoxidase in human plasma, to be used
21 in conjunction with clinical history, ECG
22 and cardiac biomarkers to evaluate patients

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 presenting with chest pain that are at risk
2 for major adverse cardiac events, including
3 myocardial infarction, need for
4 revascularization or death.

5 In the area of asthma, we've used
6 the de novo process in April of 2003 to
7 classify -- to evaluate a Class III device
8 and to classify it into Class II for the
9 breath nitric oxide that is used in the
10 monitoring of treatment for asthmatic
11 patients.

12 It has a special control guidance
13 document, and that's available on our web
14 page.

15 In the area of CLIA we can talk
16 about the test categorization, the CLIA
17 waivers that have been done for 2006, the
18 draft guidance for CLIA waiver, and the
19 database.

20 If we look at how the tests have
21 been categorized since FDA has been doing
22 the categorizations for almost seven years,

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 we can see that by far the majority of the
2 tests are categorized as moderate.

3 The tests that have been
4 categorized as high has remained about the
5 same over these past years, a little around
6 200. The number of waived tests has seen
7 some increase in the past two years.

8 The number of CLIA waivers that
9 we've done in 2006, some examples are
10 presented here. We have the glycosylated
11 whole blood hemoglobin. We've done some
12 drugs of abuse waivers for two companies,
13 Branan and Acon.

14 We've done a microalbumine urine
15 test for Bayer. We've added some chemistry
16 tests to a table top clinical analyzer, the
17 Abaxis Piccolo.

18 We've waived a whole blood TSH.

19 And the last one is the most
20 recent, which is the Lead Care II blood lead
21 testing system.

22 To help you understand how tests

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 are waived, there are three processes that a
2 test can be waived: by regulation for nine
3 generic tests, if the device is cleared by
4 FDA for home use, and if it meets the
5 statutory criteria with valid scientific
6 data.

7 The draft CLIA waiver guidance
8 was prepared through comments that were
9 received from the CLIA committee. The
10 guidance helps manufacturers to understand
11 how they need to demonstrate simple; how
12 they can demonstrate insignificant risk of
13 erroneous result through failure alerts and
14 fail-safe mechanisms, and demonstrating
15 insignificant risk of erroneous result
16 through accuracy.

17 The CLIA database is available
18 from a link from the OIVD web page. It's
19 updated twice a month, and it's
20 downloadable, so you can prepare those
21 charts that I showed you a few slides ago,
22 or you can massage the data to find out how

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 a test is categorized.

2 If the test is not in the CLIA
3 database, the default is high complexity.

4 In the area of safety, from our
5 home page we have on some safety tips for
6 laboratorians, such as false elevated HCG
7 for pregnancy tests; falsely elevated
8 triponin tests.

9 We have a link to Recalls. It's
10 a searchable database for classified recalls
11 of IVDs.

12 You can also use the Maude
13 database to get redacted medical device
14 reports.

15 And the LabSun and the MedSun are
16 two interactive postmarket surveillance
17 efforts that provide interactive
18 communication between FDA and the users of
19 medical devices.

20 MedSun is for hospitals and
21 nursing homes and other health care
22 facilities. The LabNet is for people that

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 are using in vitro diagnostic devices in
2 their laboratory.

3 Thank you.

4 DIVISION UPDATES - TOXICOLOGY

5 DR. HARPER: Hello, my name is
6 Courtney Harper, and I'm the associate
7 director for toxicology in the Office of In
8 Vitro Diagnostic Devices, and I'm going to
9 give you a very brief update of the recent
10 new and novel devices, and things that are
11 upcoming in the toxicology branch.

12 As all of you know, the
13 toxicology branch is responsible for
14 reviewing and regulating a wide variety of
15 toxicology type devices, including tests for
16 drugs of abuse.

17 But I thought today that I would
18 focus on some recent novel and upcoming type
19 toxicology and in vitro diagnostic devices,
20 including a lot of devices that are
21 indicated for uses that are useful for
22 personalized medicine.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 For those of you that are not
2 that familiar with the concept of
3 personalized medicine, it's an upcoming
4 initiative, and is certainly very important
5 in FDA's critical path.

6 In terms of increasing new and
7 novel medical products that will increase
8 the availability of new drugs and new
9 products for patients.

10 And the idea of personalized
11 medicine is choosing the right drug or the
12 right therapy or the right treatment in the
13 right dose for the right person.

14 And in order to do that, one
15 approach is from the use of companion
16 diagnostic assays. So these are assays that
17 are used in conjunction with some sort of
18 therapy or treatment for a patient.

19 Companion diagnostic tests are
20 tests that are intended to select or guide
21 drug or treatment therapy. And there are
22 several potential benefits to the use of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 these companion diagnostics for personalized
2 medicine.

3 One might be to provide
4 differential diagnosis of certain disorders
5 in order to identify a specific patient
6 subset that might be more likely to respond
7 to that particular drug or treatment.

8 And this would provide ways to
9 target therapy to the right patients.

10 Maybe even more importantly is
11 the possibility to identify individuals who
12 might be at risk for adverse events from
13 certain drugs or therapies.

14 They can -- these types of
15 diagnostic tests can also be used as adjunct
16 tools for monitoring response to drugs, so
17 that you can know if you are treating your
18 patient in the right way using the drug that
19 you have chosen.

20 And all of these are designed to
21 advance the field of individualized
22 medicine. And this will be to promote

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 treatment for individuals rather than
2 populations. And this is a new field.

3 So in order to do this we have
4 sort of three types of devices that we have
5 seen and are seeing in increasing amounts in
6 the toxicology branch. And these three
7 types of devices are devices that are
8 intended for pharmacogenetics, for
9 therapeutic drug monitoring, and devices
10 that are breath tests for a variety of
11 indications.

12 Pharmacogenetics is the use of a
13 patient's genetic information to guide drug
14 selection or dosage. So far other devices
15 that we have seen and talked most to
16 sponsors about are devices that are for drug
17 metabolizing enzymes. And a lot of these
18 are genotyping assays.

19 The first pharmacogenetic assay
20 that we cleared in the toxicology branch was
21 the Roche AmpliChip Cytochrome P450
22 Microarray system.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 This device was cleared in
2 December of 2004 by the de novo process.
3 This device is a microarray that's intended
4 to detect 27 alleles of the cytochrome P450
5 2D6 gene, and three alleles of the
6 cytochrome P450 2C19 gene. And this device
7 is intended to help doctors select and guide
8 therapy for drugs that are metabolized by
9 these two enzymes.

10 Notably this was the first
11 microarray that was cleared for clinical use
12 in the United States. And this is an
13 Affymetrix-based microarray.

14 We also reviewed in parallel the
15 Affymetrix gene chip instrumentation system
16 that is designed to read this AmpliChip
17 microarray. This was also done by the de
18 novo process.

19 And notably I'd like to discuss
20 the FDA review time. In anticipation of an
21 increasing amount of pharmacogenetic and
22 genomic activity in the IVD industry, in

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 molecular diagnostics, over the past several
2 years the Office of In Vitro Diagnostics has
3 put a lot of effort into recruiting
4 expertise in the area of genetics and
5 molecular diagnostics, and informing
6 themselves about pharmacogenetics and
7 personalized medicine, in order to be ready
8 for submissions such as this.

9 Through those efforts, and a lot
10 of collaboration and communication in the
11 field in general, and with the companies
12 involved, the FDA review time for this
13 device was actually three days.

14 Similarly about six months later
15 our branch cleared another device for
16 pharmacogenetic testing. The Third Wave
17 Invader UGT1A1 Assay.

18 This assay was submitted in
19 response to a labeling change for the drug
20 camptosar. That labeling change indicated
21 that certain patients with a STAR 28 allele
22 may at increased risk for neutropenia when

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 ingesting drugs such as Irinotecan for
2 cancer chemotherapy.

3 This assay is designed to attack
4 the normal and one variant allele that UGT
5 1A1 in order to try and predict risk of this
6 adverse event.

7 Just like the AmpliChip and the
8 Affymetrix review, the FDA review time for
9 this particular submission was 10 days
10 because of a lot of communication between
11 our office, the device submitter, and the
12 Center for Drug Evaluation.

13 In addition to those two assays
14 that have been cleared, we have a lot of
15 interest from other companies and other
16 stakeholders in additional pharmacogenetic
17 targets, including other cytochrome P450
18 enzymes, including genes that are involved
19 in Warfarin pharmacokinetics and
20 pharmacodynamics, and also genes that are
21 identified in drug development programs as
22 being target specific.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Another area of personalized
2 medicine is the area of therapeutic drug
3 monitoring. FDA has been regulating TDA
4 assays that are commercially distributed for
5 many years now. Therapeutic drug monitoring
6 assays are intended to measure the serum and
7 plasma levels of certain drugs in order to
8 help physicians identify patients who may be
9 at risk for toxicities from those drugs, or
10 may be at subtherapeutic levels.

11 We have cleared assays for many
12 therapeutic drugs, including cyclosporin,
13 tacrolimus, sirolimus and zonisamide, and
14 many others, and we have a lot of interest
15 in companies that are developing assays for
16 a lot of other drugs for therapeutic drug
17 monitoring.

18 A few years ago the assays for
19 cyclosporin and tacrolimus were down
20 classified. They were originally Class III
21 type devices, and we felt like there was
22 enough information available to mitigate the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 risks for those assays, and they were
2 actually down classified, and are now Class
3 II type assays.

4 And there is a special controls
5 guidance document on our website that
6 describes the type of information necessary
7 to provide a submission for these types of
8 assays.

9 In addition our office is also
10 working on developing a general guidance for
11 therapeutic drug monitoring assays to enable
12 companies to more easily predict what types
13 of studies might be necessary for
14 introducing new types of assays on the
15 market.

16 And finally I'd like to talk
17 about another category of tests which are
18 breath tests. These types of assays
19 generally use a isotype labeled ingested
20 compound, and then they measure exhaled
21 breath to measure a physiological
22 phenomenon.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 A few years ago our office
2 cleared one of these type of assays for H.
3 Pylori infection, but we've been getting
4 increased interest in development of these
5 type of assays for many more types of
6 indications. And those included some sorts
7 of enzyme activity including metabolizing
8 enzymes or gastrointestinal absorption
9 assays, and a lot of other conditions.

10 Notably the FDA has determined
11 these types of devices that include an
12 ingested compound are combination products,
13 and that the device is the primary mode of
14 action. What this means is that companies
15 may choose to submit one application that
16 would include information about both the
17 ingested drug and the device for measuring
18 breath as a PMA, and the drug and the device
19 components would both be approved together
20 under that application.

21 This was communicated publicly in
22 a jurisdictional update out of the Office of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Combination Products, and I've included that
2 website link in my talk.

3 I'd like to thank you for your
4 attention. If anyone has questions about
5 devices that are regulated in the toxicology
6 branch, please contact me.

7 Thank you.

8 DR. STEELE: Thank you.

9 Next we will have a presentation
10 by Dr. Sousan Altaie on the critical path
11 initiative in medical devices.

12 Dr. Altaie.

13 I understand she may not be here.

14 OPEN PUBLIC HEARING

15 DR. STEELE: We will now proceed
16 to the first open public hearing portion of
17 the meeting. Public attendees are given an
18 opportunity to address the panel, to present
19 data, information, or views relevant to the
20 meeting agenda.

21 We have five speakers scheduled
22 for this morning's session. They are

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Russell Warnick, Kenneth French, Nehemiah
2 Muniz, Samia Mora and James Otvos.

3 Each speaker has been allotted a
4 maximum of seven minutes to speak. Since
5 this will take over 30 minutes, we ask each
6 speaker to be as brief as possible, and the
7 panel to hold all questions until after
8 everyone has presented.

9 I might add that I will -- or
10 actually Ms. Calvin here -- will be keeping
11 a clock, and at six minutes I will raise
12 this notebook as a guide that you have one
13 minute left.

14 At this time I will read the open
15 public hearing disclosure statement. Both
16 the Food and Drug Administration and the
17 public believe in a transparent process for
18 information gathering and decision making.

19 To ensure such transparency, at
20 the open public hearing sessions of the
21 advisory committee meeting, FDA believes
22 that it is important to understand the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 context of an individual's presentation.

2 For this reason FDA encourages
3 you, the open public hearing speaker, at the
4 beginning of your written or oral statement,
5 to advise the committee of any financial
6 relationship that you may have with any
7 company or group that may be affected by the
8 topic of this meeting.

9 For example, this financial
10 information may include a company's or a
11 group's payment of your travel, lodging or
12 other expenses in connection with your
13 attendance at this meeting.

14 Likewise, FDA encourages you at
15 the beginning of your statement to advise
16 the committee if you do not have any such
17 financial relationships.

18 If you do not choose to address
19 this issue of financial relationships at the
20 beginning of your statement it will not
21 preclude you from speaking.

22 Mr. Warnick -- Dr. Warnick.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 DR. WARNICK: Good morning. I
2 appreciate the opportunity to present before
3 this panel today. I should disclose that I
4 am employed by Berkeley Heart Lab, which
5 provides subclass testing in the context of
6 cardiovascular disease management.

7 But I am speaking today primarily
8 from the benefit of over 35 years experience
9 in promoting improvements in lipid and
10 lipoprotein testing.

11 In the Bay area we are quite
12 familiar with earthquakes. This phenomenon
13 is a result of opposing forces. The Pacific
14 plate is continually driving against the
15 North American plate. The movement is
16 locked, and then when the force becomes
17 overwhelming, then the plate moves and the
18 consequence is an earthquake.

19 Scientific research transitions
20 to clinical practice I believe in a similar
21 manner. On the one hand we have push from
22 ever-evolving research and technology.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Innovators develop new approaches. Early
2 adopters are interested in using new
3 technology. And of course we can't ignore
4 financial incentives.

5 On the other hand we have the
6 natural resistance to change, inertia in the
7 organizations, and agencies. The time to
8 achieve consensus, and vested interests. So
9 when the push overcomes the opposition we
10 have an earthquake, and practice can
11 eventually change.

12 A lesson from history: John
13 Gofman at the University of California
14 Berkeley began this career as a physicist,
15 purified plutonium for the Manhattan
16 Project. Following the second world war he
17 received his M.D. and organized the Donner
18 Laboratory Research on coronary artery
19 disease.

20 In the early `50s, using
21 analytical ultracentrifugation he
22 demonstrated differential relationships of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 lipoproteins to coronary artery disease.

2 NIH convened a consensus
3 conference in 1956 that reviewed the
4 evidence and rejected his conclusions about
5 the utility of lipoproteins, concluding that
6 measurement of total cholesterol was
7 adequate.

8 The consequence was that Gofman
9 abandoned the lipoprotein field and went
10 back to radiation. The more significant
11 consequence in this context was that HDL was
12 forgotten and largely ignored for almost two
13 decades, until the mid-1980s, when it was
14 rediscovered. The result was a lipid panel.

15 Of course total cholesterol, triglycerides,
16 HDL cholesterol and LDL cholesterol
17 measures, became endorsed by the NCEP adult
18 treatment panel guidelines. The lipid panel
19 has been standard for longer than the career
20 of many in this audience.

21 What is not widely appreciated is
22 that the LDL cholesterol measurement, which

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 is the keystone of the guidelines, by either
2 calculation or direct assay, can be quite
3 unreliable, and these traditional biomarkers
4 miss about half the patients at risk for
5 cardiovascular disease.

6 We see here a study from the
7 Berkeley Heart Lab database of over a half a
8 million patient records, over 4,000 patients
9 with known CVDs diagnosed within three
10 months were pulled from the database. Of
11 these patients, total cholesterol, the total
12 cholesterol cut (phonetic) point identified
13 only 23 percent; 39 percent had elevated
14 triglycerides; only 11 percent had increased
15 LDL cholesterol. That is, that cut point
16 missed 89 percent of the patients with
17 cardiovascular disease.

18 By contrast, the small dense LDL
19 subclasses -- LDL 3A plus B -- identified 92
20 percent of the patients, missing only eight
21 percent of the patients at risk.

22 The HDL cholesterol cut point

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 identified 40 percent of patients, missing
2 60 percent. And the large HDL fractions,
3 HDL 2B identified 70 percent of patients
4 with disease, missing only 30 percent.

5 Now, HDL is highly heterogeneous.

6 I am going to hit very high points of a
7 very complex story here. But a 2-
8 dimensional electrophoretic method separates
9 at least 12 or 13 different fractions of
10 HDL. Most important are the alpha one and
11 alpha two species.

12 Considering a patient with
13 coronary heart disease compared to a control
14 healthy patient, there are very different
15 observations among the subclasses. The pre-
16 beta one, alpha one particles are low in
17 coronary heart disease patients, whereas
18 alpha two and alpha three particles can
19 actually be elevated.

20 There are many different studies
21 showing the differential association of
22 subclasses. Expert opinion indicates that

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 the alpha one and alpha two HDL particles
2 are much better at CHD risk prediction than
3 HDL cholesterol.

4 The subclasses also much better
5 monitor the effects of therapy.

6 LDL is also heterogeneous with at
7 least seven fractions separated by a
8 gradient gel electrophoresis method.

9 There is abundant evidence that
10 small dense particles are more atherogenic,
11 as indicated here. And a variety of studies
12 have shown that LDL size can be an
13 independent risk factor independent of
14 triglyceride and HDL.

15 In one study LDL size as a better
16 predictor of the stenotic change than LDL
17 cholesterol.

18 So current LDL cholesterol, HDL
19 cholesterol measurements, do not fully
20 characterize cardiovascular disease risk in
21 patients. The HDL cholesterol assay does
22 not identify the differential association of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 subclasses. LDL cholesterol assays can be
2 unreliable. Subclass determinations can
3 better characterize risk, facilitate
4 prevention and treatment options are
5 available.

6 So in conclusion, lipid panel has
7 dominated the practice for over 20 years;
8 fails to identify half the patients at risk.

9 Lipoprotein subclasses can better
10 characterize risk.

11 So, time for a new paradigm.

12 Thank you.

13 DR. STEELE: The next speaker.

14 MS. CALVIN: I just want to remind
15 you that when the yellow light comes on,
16 that is your one-minute warning.

17 MR. FRENCH: Should I start?

18 Okay. My name is Kenneth French. In the
19 interest of full disclosure, I am the
20 director of education at Atherotech that
21 performs the vertical auto-profile
22 technique, also known as the VAP cholesterol

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 test.

2 This test is used by roughly over
3 12,000 physicians nationwide, performing a
4 little over a million tests per year at a
5 cost of \$4, and reimbursing around \$34.

6 So that's the landscape which I'm
7 coming from. I was asked to put together a
8 presentation of clinical relevance, and I
9 actually chose the opportunity to use the
10 current national guidelines, and current
11 recommendations to clinicians who are
12 managing patients who are at risk for
13 coronary vascular disease or dyslipidemia
14 associated with diabetes, or thyroid
15 stimulating problems, or patients with --
16 female patients with hormone problems.

17 The first one is probably the
18 most familiar to most people. It's of
19 course the National Cholesterol Education
20 Program, the ATP III guidelines that was
21 produced in 2002. I was quite pleased
22 with this presentation that was delivered,

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 simply because it addressed more than just
2 LDL, which is what we are here to do today
3 is address more than just traditional risk
4 factors.

5 So looking at the highlights,
6 when I looked at the term, subclasses of
7 LDL, well there is just more than one
8 subclass. And a quote from the ATP
9 guidelines said, emerging risk factors that
10 can be measured include elevations in
11 lipoprotein (a) remnants, hence, IDL is a
12 portion of the LDL total. So it's a
13 subclass of LDL, as well as small LDL, which
14 is I think largely where a lot of the focus
15 is here.

16 But I think the key here, that
17 there was already a recognition that these
18 can be measured, and can be used in clinical
19 practice.

20 Metabolic syndrome, I think this
21 is probably -- I could be wrong -- but I
22 think this is rapidly increasing as the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 number one risk factor in the United States,
2 due to the fact that we are very savvy, and
3 we love sugar, and we're losing our
4 population in terms of exercise.

5 But I think it's associated risk
6 factor have emerged as a coequal partner.
7 That was referenced in the guidelines. And
8 one of the real contributing factors to that
9 is the small LDL that is associated with the
10 triad or the dyslipidemia associated with
11 this disorder.

12 And I think Gerald Grievens
13 (phonetic) did some really good work where
14 he's actually showing this triad actually
15 predicts diabetes risk much earlier than the
16 traditional hemoglobin A1C or glucose
17 markers that we've been using for years.

18 But it does certainly warrant --
19 how do you address when you see this triad,
20 is, you certainly lower the LDL goal. One
21 of the things we are looking at is when you
22 take more and more, you have for example a

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 patient who is borderline, we don't know
2 when to treat. This could certainly be an
3 opportunity to raise that patient's risk
4 level, not just that dyslipidemia alone, but
5 the metabolic syndrome as a whole. This is
6 just the lipid portion of that.

7 And then treatment opportunities
8 could change as a result of this.

9 Lipoprotein (a), you know, the
10 guidelines express that the presence of an
11 Lp(a) thus raises an option to raise a
12 person's risk to a higher level.

13 Again, the emphasis is what do
14 you do when you see this, or you have a
15 patient who is intermediate risk, where
16 there is a decision to maybe treat or not
17 treat. An Lp(a) certainly warrants the
18 ability for a physician to say yes, due to a
19 family history, choose to treat these
20 patients' LDL more aggressively.

21 Small dense LDL is a component of
22 atherogenic dyslipidemia, which we just

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 discussed, with the metabolic syndrome.
2 It's not exclusively as a part of the
3 checklist for high elevations, but it's a
4 large part of. And of course this changes
5 the way the risk is associated with that
6 patient.

7 And of course there are
8 opportunities for therapeutic changes.

9 And of course the last is the
10 remnant lipoproteins, a person with high
11 serum triglycerides, remnants should be
12 treated in addition to the lowering of LDL
13 cholesterol. So here we see not only LDL
14 being addressed, but we see the opportunity
15 that we should be lowering remnant
16 lipoproteins in addition to the lowering of
17 LDL-C.

18 So that's a component of non-HDL,
19 so again, this changes the patient's risk
20 and therapeutic changes.

21 The next one is the working group
22 in lipoprotein measurements, the document

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 from 1995, sponsored by the NIH, and
2 National Heart and Lung Blood Institute.
3 One slide, and I think it's quite important,
4 and two bullets.

5 Proportional contributions of
6 those two emerging risk factors, IDL and
7 Lp(a), to the total LDL measurement would
8 expect it to be higher in at-risk
9 populations, and I think you are hearing
10 that. And of course for all current and
11 future methods -- I think this is why we're
12 here -- when we look at these methods, the
13 nature of these lipoproteins, in other
14 words, when we look at LDL, we need to have
15 measurements and methods that can actually
16 differentiate what we are looking at,
17 because not all LDL is created the same, nor
18 is it treated the same. So they have very,
19 very different pharmaceutical reactions to
20 the different drugs that we have.

21 So the next group is just the
22 NACB, or the National Academy of Clinical

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Biochemistry. And this was a summary of the
2 recommendations of the draft. I haven't
3 gotten the actual final report. But it was
4 very clear at the meeting that they felt
5 Lp(a) is a unique animal in the risk factor,
6 particularly useful in genetic
7 predisposition.

8 They definitely did talk a lot
9 about the HDL and LDL subclasses. I think
10 one of the things we need to remember is,
11 the sizing of LDL is directly related --
12 there is a direct relationship to the Apo B
13 concentration. So I mean it's knowing one
14 or the other, two pieces of information, to
15 gain more information about vascular risk.

16 And then of course remnant
17 lipoproteins got some podium time as well.

18 And then the last group is the
19 American Association for Clinical
20 Endocrinologists, and this is basically the
21 guidelines for endocrinologists. And the
22 version that I am referring to is the 2002

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 amended version.

2 And again, it lists the following
3 subclasses as risk factors for CAD. Small
4 LDL subclasses with reference to insulin
5 resistance; and then of course Lp(a) should
6 be considered in patients with future
7 coronary vascular risk.

8 I appreciate your time. Thank
9 you. Mr. Muniz.

10 MR. MUNIZ: My name is Nehemias
11 Muniz. I'm with Quantimetrix Corporation.
12 I'm an employee of Quantimetrix Corporation.

13 We have worked on the development of
14 diagnostic tests for measuring LDL
15 subfractions, and we are also interested in
16 measurement of HDL subfractions, and we
17 would like to have a test that can do that,
18 provided that it shows that it's safe and
19 effective.

20 I am not going to talk about the
21 LDL subfractions at this time, but since our
22 current interest is in HDL subfractions, I

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 will give you a slide presentation of some
2 of the findings we have discovered in the
3 testing of HDL subfractions.

4 And we have looked at two
5 different populations, one of normolipidemic
6 versus dyslipidemic population.

7 We all know that HDL is
8 heterogeneous, and differs in composition
9 and function and has organic potential.
10 There have been different methods that have
11 been employed to measure these subfractions,
12 among them some that have already been
13 discussed, are NMR, gradient gel
14 electrophoresis, ultracentrifugation,
15 precipitation, and the method that we
16 employ, which is linear polyacrylamide gel
17 electrophoresis.

18 As we know traditionally HDL has
19 been divided into two major subclasses,
20 which is HDL2 and HDL3. And depending on
21 the method of separation employed, as many
22 as 10, 12, 13 subfractions have been

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 identified.

2 Using the linear polyacrylamide
3 gel method, we identified about 10 different
4 subfractions, and we grouped them, just for
5 the sake of simplification, into three major
6 categories, which we call large HDL,
7 intermediate HDL, and small HDL.

8 Most of the changes in HDL seem
9 to be of genetic origin. However
10 environmental factors, such as diet and
11 other things, may contribute to the
12 distribution of this HDL subfractions. And
13 we found that the subfraction that usually
14 has the most change is the large HDL
15 subfraction. That's where most of the
16 change occurs, based on diet or genetics or
17 whatever, seems to be the subfraction that
18 has the biggest change.

19 While intermediate density
20 lipoprotein seems to be more consistent, not
21 to shift as much, while the smaller HDLs
22 seem to be controlled, possibly genetically,

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 and seem to be different from the other two
2 subfractions.

3 There have been studies that have
4 questioned -- and that's why we're here
5 today -- to discuss whether this is really
6 applicable and beneficial.

7 And if we look at the literature,
8 there are lots and lots of studies that show
9 the importance of large HDL, but there are
10 other studies that have shown not so good a
11 relationship between the HDL subfractions
12 and disease state.

13 The technique that we use, the
14 method that we use, as I indicated is a
15 linear polyacrylamide gel. It consists of a
16 separating gel, a stacking gel, and a
17 loading gel which contains a lipid
18 lipophilic that binds the particles.

19 Then by measuring the area under
20 the curve after scanning the gels, we can
21 calculate the are under the curve, and make
22 an estimation of the cholesterol in the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 various subfractions.

2 As you can see on the right
3 there, three different patients in duplicate
4 that show the differences of the
5 distribution that can be observed from the
6 gel.

7 In this next slide we can show
8 what we see, the type of profile that we see
9 in a normal population. We can see that,
10 since the subfractions are separated in
11 size, starting from left to right are the
12 larger particles, in the green; the
13 intermediate is in the yellow; and the small
14 particles are in the red on the right-hand
15 side.

16 And so in a typical normal
17 profile, this is what we observe. In none -
18 - normal population this is more likely the
19 profile that we observe. And you can see
20 that the large HDL is totally diminished.
21 The intermediate HDL remains relatively
22 constant. And on the right side you can see

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 that the red, small dense particles, can
2 extend significantly, and their number can
3 increase, based on the quantification, not
4 this.

5 We also did some comparison by
6 looking at the various subclasses, that is,
7 the large HDL, the intermediate HDL, and the
8 small HDL. And we did correlations with
9 other known risk factors. And the ones that
10 have the little square on the left side are
11 some of the more important ones. For
12 instance, you can see that the large HDL in
13 the first line correlates very highly with
14 the total HDL, as you can see by the length
15 of the bar.

16 However, when you look at the
17 total cholesterol, there is no correlation,
18 or very tiny small correlation, really, with
19 total cholesterol.

20 We also compare it to particle
21 size of the LDL. And you can see also there
22 is a relatively strong correlation with the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 particle size, but a strong negative
2 correlation with LDL cholesterol, and very
3 strong negative correlation with
4 triglycerides. This is for the large HDL.

5 Now if you look at the
6 intermediate HDL you can see pretty similar
7 relationship, except now instead of having a
8 negative correlation with total cholesterol,
9 it has a slightly positive correlation with
10 total cholesterol. But really it doesn't
11 differ very very much from the large HDL.

12 Now when we look at the small
13 HDL, you can see that the small HDL does not
14 have the same strength of correlation than
15 the -- to HDL cholesterol --

16 DR. STEELE: Could you wrap this
17 up, please?

18 MR. MUNIZ: Now it has a positive
19 correlation with triglycerides.

20 When we look at the means of the
21 two populations we can see the means of the
22 large HDL and the small HDL are different in

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 the two populations, and this is graphically
2 how they are represented.

3 One more second? So in
4 conclusion we found that not all HDL
5 subfractions are the same. They have
6 different correlations with different risk
7 factors, and especially, the greatest
8 difference is between the large HDL and the
9 small HDL.

10 So based on this we conclude that
11 all HDLs should not be considered the same.

12 They are very different and have different
13 influences.

14 Thank you.

15 DR. STEELE: Thank you.

16 Dr. Mora.

17 DR. MORA: Good morning, thank you
18 for inviting me -- or for listening to me
19 this morning.

20 My name is Samia Mora, and I work
21 at the Brigham Women's Hospital in the
22 division of preventive medicine. And I'm

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 also a cardiologist, so I work in
2 cardiovascular medicine.

3 These are the financial
4 relationships, travel and lodging for this
5 trip were paid by LipoScience. No other
6 financial relationships.

7 So many studies have shown that
8 patients with smaller LDL size have greater
9 CHD risk. So the question is, is this
10 increased risk due to LDL particle size, or
11 is it due to particle number?

12 Shown in this slide is two
13 scenarios, actually, one here on the left
14 where for the same LDL cholesterol, which is
15 130 milligram per deciliter, you have fewer
16 LDL particles, but they are larger size.

17 And on the right here, the same
18 LDL cholesterol, 130 milligram per
19 deciliter, and you have a larger number of
20 particles, but they are smaller.

21 As you can see here, the smaller
22 LDL particles are also associated with

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 higher particle number. So the question for
2 CHD risk, is it the particle size or is it
3 the particle number?

4 So we asked this question in the
5 MESA study. And the question we asked, is
6 the relationship of LDL size with CHD
7 confounded by LDL particle number?

8 And a confounder as shown here is
9 associated with the risk factor, and also
10 causally associated the outcome.

11 So the question we had, was the
12 LDL particle number, LDL-P, which is
13 associated, as I just showed you, with LDL
14 size, is that confounding association of LDL
15 size with CHD?

16 And the other question, is small
17 LDL particles, are they confounding the
18 association of large LDL particles with CHD?

19 I'm basically summarizing our
20 results which were published in
21 Atherosclerosis. They are online, not out
22 in print yet, but the reference is up there

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 for you.

2 So the MESA study is an NHLBI
3 sponsored study. We recruited patients from
4 six different sites across the United
5 States, and we had about 5,500 participants.

6 They come from four different ethnic racial
7 backgrounds, as shown here, and half of them
8 are women. The mean age was 61.

9 And first we looked at the
10 individual chemical lipid measures. So the
11 standard LDL cholesterol, HDL cholesterol,
12 triglycerides.

13 Now what we did was, each linear
14 regression model, looked at the association
15 of each of the lipid measure with carotid
16 intima-media thickness. And shown here is
17 first-handed (phonetic) deviation increment
18 in that lipid measure. So for example, one
19 standard deviation increment in LDL
20 cholesterol was associated with 37 micron
21 higher INT. And that was statistically
22 significant.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 And similarly we found for HDL
2 cholesterol was inversely associated with
3 carotid IMT, as we would expect. And
4 triglycerides were positively associated.

5 And each of these models was
6 examined separately, so each variable at the
7 time was in the model. And we adjusted for
8 the other risk factors -- age, sex, race,
9 smoking, and hypertension.

10 Now this is for the LDL particle
11 associations with carotid IMT. Shown here
12 again is each lipoprotein variable, but one
13 separately in each model. For example, LDL
14 size, one standard deviation increment was
15 associated inversely with carotid IMT.

16 Total LDL particle number was
17 positively associated with carotid IMT. As
18 you can see here, one standard deviation was
19 associated with 14 micron higher IMT. And
20 remember, for LDL cholesterol it was 37
21 micron higher IMT. Also highly significant.

22 Now, then, we asked for large

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 versus small HDL, and we put again each one
2 separately in the model. And we found large
3 LDL was not associated with IMT and put
4 separately in the model, whereas small LDL
5 was associated with carotid IMT.

6 Now there are potential sources
7 of confounding. So as you note here, large
8 LDL and small LDL are negatively inversely
9 correlated, with a negative correlation
10 coefficient of minus point six.

11 Note that small LDL and large LDL
12 have differing associations with LDL size.
13 And small LDL is inversely associated with
14 LDL size, and large LDL positively
15 associated with LDL size.

16 So this becomes very important
17 when we do the next models. Total LDL
18 particle number was inversely associated
19 with LDL size.

20 When we looked at LDL size, as I
21 showed you earlier, put it in the model
22 separately, adjusted only for these risk

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 factors, but not for LDL particle number,
2 that was the negative association shown
3 here.

4 Now when we adjust LDL size for
5 LDL particle number, so we put the two
6 together in the model and adjust for these
7 risk factors, we found that the P value
8 becomes nonsignificant, and actually the
9 direction of the association is reversed.
10 But again this is nonsignificant.

11 Here are the individual
12 subclasses. So large LDL-P particle number,
13 when put separately in the model as shown
14 before, was not associated with IMT.

15 Now when we adjust for small LDL
16 size, so large LDL-P adjusted for the number
17 of small LDL particles, we found now that
18 large LDL particle number was associated
19 with IMT, highly significant, and small LDL
20 particle number, when we adjust for large
21 LDL, is also highly significantly associated
22 with carotid IMT, and note that the change

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 in IMT is similar between large and small.

2 Once you take into account the
3 particle number of the other subclass.

4 So adjusting for the small LDL
5 particle number and mass, the true
6 association of large LDL with IMT. And
7 again shown here on the left side is when we
8 don't adjust for small LDL. So these are
9 increasing quintiles of large LDL, and you
10 see there is no association with carotid
11 IMT.

12 Now when we adjust for small LDL-
13 P, all of a sudden we see that highly
14 significant relationship of large LDL-P with
15 carotid IMT.

16 And these findings from MESA
17 showing the negative correlation between
18 large and small LDL --

19 DR. STEELE: Could you wrap that
20 up, please?

21 DR. MORA: Yep. Were also
22 confirmed in the VP hit, where when they

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 adjusted for large and small LDL-P they also
2 found both were associated with events.

3 So our summary is that without
4 adjusting for small LDL particle number, we
5 found large LDL particle number was only
6 weakly associated with IMT, which is
7 consistent with the prior studies.

8 However, when both the small and
9 the large LDL particles were examined
10 jointly together in the model, both were
11 highly significantly associated with carotid
12 IMT, even after adjustment for the
13 traditional risk factors.

14 And LDL particle size, as I
15 showed, contributed little after accounting
16 for LDL particle number.

17 Thank you very much for your
18 attention.

19 DR. STEELE: Thank you.

20 Dr. Otvos?

21 DR. OTVOS: Thank you.

22 I am happy to say a few words

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 about the other technology used to provide
2 information about lipoprotein subclasses,
3 NMR spectroscopy. And I do have a
4 relationship with Lipo Science. I am an
5 employee and a stockholder of Lipo Science.

6 Just a quick background. We've
7 been in this business about 10 years, have a
8 CLIA-certified laboratory that is CAP
9 certified; have analyzed over 2 million NMR
10 lipoprotein tests. And in 2006 the AMA
11 issued a CPT code specific to quantification
12 of lipoprotein particle numbers by NMR.

13 Now the topic of this meeting is
14 going to be to address the meeting of
15 whether the so-called quality of LDL and
16 HDL, the subclass distributions or subclass
17 concentrations, are clinically relevant.

18 And as you all know, the quantity
19 of LDL and HDL are already well established
20 as important risk factors for cardiovascular
21 disease, and the way that these are
22 quantified is to measure the cholesterol in

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 LDL and HDL. So I just want to
2 distinguish between the quantity of LDL and
3 HDL well established, and the question about
4 whether subclasses are the quality add to
5 that.

6 But I also want to raise the
7 point that there are alternative measures of
8 LDL and HDL, alternative ways to quantify
9 these particles. Apo B is one of them. Apo
10 B measures the protein constituent on LDL
11 and VLVL and gives you a pretty good
12 approximation of LDL particle number.

13 So now along comes NMR
14 spectroscopy which not only enables or gives
15 visibility to the concentrations of various
16 subclasses, but is also an alternative way,
17 alternate way, of quantifying LDL and HDL.
18 According to the number of particles.

19 So the method measures the
20 particles themselves, not just the
21 cholesterol constituent, and it has a number
22 of attractive analytic characteristics.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 It's rapid, automated, reproducible, and it
2 doesn't require physical separation of the
3 particles.

4 How does it work? I can't go
5 into this in detail obviously. But it
6 basically takes advantage of a natural
7 phenomenon, which is that different
8 lipoprotein subclasses, for natural
9 physical-chemical reasons broadcast
10 characteristically different NMR signals,
11 and by measuring how big those signals are
12 in a patient's plasma, the amplitude of the
13 signals, you get direct information about
14 the number of particles contributing to that
15 signal.

16 So the signal shows up in an NMR
17 spectrum as shown here, proton NMR spectrum
18 blood plasma that just takes a few seconds
19 to acquire. When you blow up that signal,
20 you can see certain fine structure, and with
21 good preknowledge about what the signals
22 look like from each of the different size

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 VLVL, LDL and HDL subclasses, one can
2 spectrally deconvolute the signal to get the
3 amplitudes of the individual subclasses.
4 That's a process that occurs with a
5 computer, takes less than a second to
6 accomplish.

7 So right now we have a number of
8 NMR spectrometers that we have tried to turn
9 into clinical analyzers in our laboratory in
10 Raleigh, North Carolina. And I just wanted
11 to show this to indicate that what we've
12 discovered is that one can get very good
13 agreement between the information produced
14 on the different machines.

15 So standardization of this is not
16 going to be difficult. It will actually
17 give very good inter-machine and inter-
18 laboratory relations, we believe.

19 So we are now using, as I said,
20 NMR spectrometers that are essentially off
21 the shelf mated with sample handling
22 equipment, off the shelf, and we have turned

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 these into clinical analyzers in our
2 laboratory.

3 But we believe the future of this
4 is that these machines can be integrated,
5 and this is a machine in the final stages of
6 development, where any laboratory in the
7 world will now be able to automatically
8 produce this information very efficiently.

9 So again what the assay actually
10 produces initially are the concentrations of
11 the individual subclasses, but currently, we
12 are reporting for clinical use only three
13 pieces of information: the total LDL
14 particle number, LDL-P. And from the
15 particle information, we also can calculate
16 HDL cholesterol and triglyceride information
17 that is very highly correlated, essentially
18 clinically equivalent to chemically measured
19 HDL cholesterol and triglyceride.

20 We also report all the individual
21 subclass information and particle sizes, but
22 these are reported for informational

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 research uses; no clinical claims being made
2 for this at the current time.

3 So the assay is well validated
4 analytically. Just a quick couple plots
5 showing the relations of chemical and NMR
6 triglyceride and HDL cholesterol. The
7 closest thing that LDL particle number is
8 related to is LDL Apo B. This shows the
9 relationship is very good between those two
10 measures.

11 The size information or the
12 subclass information also agrees well with
13 other methods; gradient gel electrophoresis
14 in particular is what we've used to
15 characterize these relationships. These
16 are all information that was published
17 recently.

18 The assay is also well validated
19 clinically. We've actually gone out of our
20 way over the past five or six years to try
21 to learn what good is this information?
22 What relationships does this information

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 have to clinical outcomes.

2 So there have been over 600
3 studies completed so far; 180 studies are in
4 progress, about 10 new studies a month.
5 This assay is being used by lots of
6 pharmaceutical companies to characterize
7 various agents that have affects on
8 lipoprotein metabolism. Many of these have
9 conducted audits since 2002, because of the
10 intended use of this information to support
11 FDA submissions, 125 publications to date,
12 mostly since 2003.

13 And among the outcome studies,
14 there is I think been eight to date showing
15 prospectively showing that LDL particle
16 number has a stronger relationship to
17 incident cardiovascular disease than LDL
18 cholesterol.

19 You've heard results from the
20 MESA study. Many other studies have been
21 conducted in the same way in which frozen
22 samples at baseline have been used to learn

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 about the associations.

2 Lots of different cardiovascular
3 endpoints, hard outcomes as well as
4 subclinical outcomes. I'm not going to go
5 through these in any detail obviously.

6 Also, the assay as I've mentioned
7 has been used by many pharmaceutical
8 companies to look at many different types of
9 therapeutic interventions. You see a list
10 of those for which published information is
11 now available.

12 So finally just to conclude this
13 assay has been in use now for almost 10
14 years. It's well validated analytically and
15 clinically.

16 We very much believe that any
17 claims about clinical utility should be
18 evidence based. And there is a lot of
19 evidence that we have generated, and broader
20 utilization will now be enabled by
21 decentralization of the assay.

22 Thank you.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 DR. STEELE: Thank you.

2 At this time, does the panel have
3 any questions for the open public hearing
4 presenters?

5 Questions? Oh, excuse me, Dr.
6 Gronowski.

7 DR. GRONOWSKI: My question is for
8 Dr. Otvos. Have you or anyone else looked
9 at the effects of freezing and storage on
10 particle number, particle size, these kinds
11 of things? In particular, temperature of
12 storage, length of storage, and repeated
13 freeze-thaw?

14 DR. OTVOS: Right. Virtually all
15 those studies that I referred to involved
16 samples frozen at minus 70 degrees for long
17 periods of time; some studies up to 30
18 years. Mr. Fit (phonetic) was an example
19 of that.

20 Under control conditions where
21 you measure it fresh, freeze it, thaw it,
22 measure it again. Very good associations.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Only issue is in the highly -- triglyceride
2 rich samples in which freezing does affect
3 some of the large triglyceride rich
4 particles.

5 But no affect on LDL or HDL
6 information. Freezing at minus 20 degrees
7 for more than a couple of months -- sorry,
8 for more than a couple of weeks -- starts to
9 cause changes, so that's not an acceptable
10 storage condition.

11 So yes, we do have a lot of
12 information on that.

13 DR. STEELE: Thank you.

14 Question for Dr. Watson?

15 DR. WATSON: This question is
16 actually for anyone, the companies that do
17 subclass distribution.

18 A lot of these clinically are not
19 well studied, so we clinicians use LDL/HDL
20 as you've mentioned. But we are starting to
21 use the measure, non-HDL cholesterol, sort
22 of as a poor man's way of approximation Apo

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 B or total particle number.

2 And I guess I didn't get a sense
3 about how your assays correlate with non-HDL
4 cholesterol, and how is there added benefit
5 above measuring the non-HDL cholesterol,
6 which is already done in every clinical lab.

7 MR. FRENCH: We actually at
8 Atherotech are using the vertical profile
9 technique, are able to calculate a Apo B 100
10 value that is right now correlating greater
11 than 95 percent to using -- but of course
12 you have to use information beyond just non-
13 HDL. The best work I've seen so far, by
14 several people, Grundy (phonetic) being one
15 of them, is around the 827.92 range. So the
16 fact that we can get a better correlation
17 with that Apo B, using the non-HDL and
18 subclasses of LDL, that tightens up that
19 correlation much much better. So you can
20 use non-HDL or Apo B interchangeably, but
21 you've got to be careful of the techniques
22 that are being used. And all of the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 techniques listed here are much more
2 sensitive at determining that information.

3 Did that help?

4 DR. WATSON: So the correlation to
5 non-HDL that you are seeing --

6 MR. FRENCH: With the technique
7 that was used.

8 DR. WATSON: Is .87 is what you
9 are saying?

10 MR. FRENCH: No, ours is greater
11 than .95. That would be the vertical
12 profile technique. But if you look at
13 traditional total cholesterol minus HDL,
14 that method of non-HDL, then what you see is
15 a lower correlation of Apo B direct measure
16 too.

17 Did that answer your question?

18 DR. WATSON: Yes.

19 DR. OTVOS: Let me just add
20 something to that. The use of non-HDL
21 cholesterol has been promoted as having
22 efficacy because it includes particles

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 besides LDL, VLVL particles.

2 The reality, though, is that I
3 think non-HDL cholesterol has stronger
4 relationships with outcomes than LDL
5 cholesterol because it is a surrogate marker
6 for LDL particle number. And we have a lot
7 of data that speaks to that.

8 So then the question is, is there
9 any advantage of measuring LDL particle
10 number over non-HDL cholesterol? There was
11 a paper that was published just this week
12 actually in AJC that looks at discrepancies
13 between categories of non-HDL cholesterol
14 and NMR measured particle number that shows
15 that yes, in hyper-triglyceremic patients,
16 non-HDL cholesterol gets you closer than LDL
17 cholesterol to LDL particle number, but
18 there are still lots of discrepant
19 situations.

20 So it is better than LDL
21 cholesterol, but not the same as LDL
22 particle number.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 DR. STEELE: Thank you.

2 DR. SUPERKO: Hi, I'm from the
3 Fuqua Heart Center. I want to make two
4 quick comments.

5 I was in and developing this
6 field for the past 20 years, 10 years at
7 Stanford, Peter Wood, Ron Krauss, 10 years
8 at U.C. Berkeley, John Gofman, Frank
9 Lingren, tons of NIH research.

10 Two quick points I'd like to
11 make. Number one, a lot of these issues can
12 be resolved with standard measures of
13 triclycerides and HDL cholesterol. Strong
14 correlation in 1999 in the Medicare Bulletin
15 we got Medicare to pay for these tests.

16 However, in that bulletin it also
17 said that they are not useful, excuse me,
18 when triglycerides are over 250 or less than
19 70. So number one, measuring true Apo B,
20 LDL Apo B, or B 100, you can eliminate the
21 need for a lot of these tests. So that goes
22 to your point.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Number two, this field is totally
2 nonregulated. What you really need to think
3 about is, do we need standardization for any
4 of these techniques, such as
5 ultracentrifugation, density gradient, ANUC.

6 So please consider those two points.

7 DR. STEELE: Thank you. I have to
8 apologize. This is only open to the
9 presenters.

10 There is another question here
11 from Dr. Marcovina?

12 DR. MARCOVINA: Yes.

13 One is for Russell Warnick,
14 please. Russell, do you have a correlation
15 standard between the determination of HDL
16 283 by differential precipitation technique
17 in the gradient gel electrophoresis?

18 MR. WARNICK: No.

19 DR. MARCOVINA: And one is for
20 James Otvos. Do you have a data on a
21 correlation between LDL particle number and
22 the total Apo B?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 And also you presented some small
2 correlation between LDL Apo B and elevated
3 particle number. How was that LDL Apo B
4 measured?

5 DR. OTVOS: It was measured
6 nephelometrically with the --

7 DR. MARCOVINA: Yeah, but with
8 LDL, so how was LDL particularized?

9 DR. OTVOS: The LDL was separated
10 by preparable ultracentrifugation. Well,
11 no, so all that was done was that the VLDL
12 was removed, so it was one spin, and then
13 bottom fraction Apo B measurement, to give
14 LDL Apo B.

15 And yes, the correlations are
16 essentially equivalent between plasma Apo B
17 and LDL particle number and LDL Apo B,
18 because 95 percent of the Apo B is on LDL
19 particles typically.

20 So that's typically what we find
21 our correlations on .95.

22 DR. MARCOVINA: Between LDL

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 particle number and Apo B?

2 DR. OTVOS: Between LDL particle
3 number and plasma Apo B, .9 to .95.

4 DR. MARCOVINA: Thank you.

5 DR. STEELE: Okay, and the last
6 question will be from Dr. Levinson.

7 DR. LEVINSON: Thank you.

8 I want to say that I'm impressed
9 by the presenters, Dr. Otvos and Russ Warner
10 and others who have been in this field for
11 many many years.

12 Nevertheless, and I would like to
13 address a question to several people that
14 spoke. They present a lot of data, some of
15 which is in press, I guess, so I haven't had
16 a chance to see it.

17 But I have a few papers here that
18 I brought with me. And one of these is the
19 first author's Gardner, and the last author
20 is Krauss. And according to this paper the
21 conclusions, and this is what I'd like a
22 response to is these conclusions: However,

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 talking about small density LDL, however,
2 when added to physiological parameters
3 above, the total cholesterol of HDL-C
4 cholesterol was found to be a strong
5 independent predictor of coronary artery
6 disease status.

7 That was in JAMA in 1996. And
8 here I have -- I don't have the original
9 paper, but this is a letter referring to a
10 paper by Dr. Campos, and it's Dr. Krauss who
11 is referring, and Dr. Campos apparently
12 found in his studies that bouyant LDL was a
13 better marker actually than small dense LDL.

14 Then another paper here, Ernest
15 Schaefer is the last author, and they say
16 the data indicated that small LDL particle
17 size is not an independent discriminator for
18 coronary artery disease after conventional
19 risk factors and lipoprotein parameters such
20 as LDL and HDL cholesterol are taken into
21 account.

22 And again, this doesn't include,

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 as was mentioned, Apo B, and also, non-HDL
2 cholesterol, which several studies have
3 shown, at least statistically, very similar
4 to Apo B.

5 And let's -- yeah, okay. So
6 those are the three. And so it seems to me
7 that adds a lot of question as to whether
8 small dense LDL for example are as important
9 as some people have suggested. So I'd be
10 glad if any of the speakers would respond to
11 that.

12 DR. STEELE: Is there any response
13 from the speakers? Dr. Moore?

14 DR. MORA: Yes, I just want to
15 bring up one point again, which is that in
16 the MESA what we found was that because the
17 small and the large were negatively
18 correlated, moderate correlation, minus
19 point six, I think that's explaining a lot
20 of some of the confusion in the field about
21 LDL size.

22 As I showed, two people can have

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 the same LDL cholesterol, but some may have
2 more particles if they have the small ones,
3 compared with fewer particles of the large.

4 So when you just look at small
5 LDL size, for example in MESA, alone, that
6 was associated with atherosclerosis, but
7 then when you take into account particle
8 number, it turns out it's actually the
9 particle number, not the size. So both the
10 large and the small.

11 And I think some of that -- some
12 of the findings from the prior literature
13 can be explained by this. Different
14 populations have different proportions of
15 people with small versus large LDL; for
16 example, people with familiar
17 hypocholesteremia have more of the large
18 LDL. That's why their cholesterol is
19 higher. And people with metabolic syndrome,
20 as we heard, we know have more of the small
21 LDL particles.

22 So different populations have

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 different mixtures, and if you don't take
2 into account particle number, and you just
3 look at particle size, then you are going to
4 miss that association.

5 And that's why I think there is
6 differing results in the literature before.

7 Because as we demonstrated clearly, when
8 you just look at LDL size, without taking
9 into account particle number, it seems there
10 is an association. But then when you take
11 into account particle number, the
12 association goes away, and both large and
13 small were actually associated with
14 atherosclerosis and the carotids.

15 DR. STEELE: Thank you. We are
16 running out of time. You were up ready to
17 go, why don't you go, Mr. French. Or if you
18 want to defer to Mr. Warner. Please, we are
19 running behind, and we need to -- if you
20 have a real brief statement, Mr. Warnick.

21 MR. FRENCH: Dr. Livingstone, do
22 you mind just repeating that question one

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 more time for me please.

2 DR. STEELE: I don't know if we
3 have time for that.

4 MR. FRENCH: Well, I tell you
5 what, if I understand his question, and I've
6 seen all three of those papers, the
7 overwhelming body of evidence is what we are
8 kind of looking at. But one of the key
9 things you want to keep in mind is how these
10 points are defined. At some of these
11 clinical trials they are very very
12 different. So offline I'd love to have that
13 discussion with you.

14 But that's what we're really
15 looking at here in some cases is how you
16 define what's pattern A and pattern B.

17 Thank you.

18 DR. STEELE: Yes, please, just
19 very brief, please.

20 MR. WARNICK: Measurements of the
21 lipoproteins and subclass are very
22 difficult, very challenging. The methods

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 have evolved over the years. I know
2 gradient gel electrophoresis best, and we've
3 found that by adjusting the gradient we can
4 improve first the separation of subclasses.

5 We've found that the early absorbance dyes,
6 oil red O, and Sudan black, are non-
7 stoichiometric; that is, they underestimate
8 the dominant particles. So studies, all of
9 the early studies done with the absorbent
10 dyes are compromised by that fact.

11 Also we find that by quantitating
12 (phoretic) particles, rather than reporting
13 relative percent we can eliminate the
14 variability of the inner influence of the
15 various particles on the quantitation. So
16 by absolute quantitation, we can eliminate
17 some of the noise.

18 So I think these studies are
19 compromised by the particular use of the
20 techniques and by the lack of refinement of
21 the techniques in the early studies.

22 DR. STEELE: Thank you.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 Dr. Zhang had a question. Can it
2 wait? Okay, go ahead.

3 DR. ZHANG: I have a very quick
4 question. Any of the presenters can answer
5 this one.

6 It's not clear to me in the
7 general -- in your opinion, you were like to
8 have a panel of lipoproteins as future
9 assay, or you think or you believe one of
10 them or two of them should be independent
11 assay, as a general strategy, I would like
12 to know.

13 Because in the clinical practices
14 right now, at least we have three as a panel
15 to look at.

16 And I heard some of -- I'm not
17 going to repeat an individual indicator,
18 sounds like when you emphasize one over
19 others, I'd like to know your general
20 thinking about a strategy. You want a panel
21 5, 10 today you can get the 10 through 19,
22 whatever. You have several parameters in

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 the panel.

2 Whether or not you believe one --
3 I'm not going to point out specifically --
4 you believe one is more important than the
5 other.

6 Anyone can answer my question as
7 general thinking.

8 DR. STEELE: Seeing no responder,
9 and this can be brought up again, and
10 probably will be brought up again this
11 afternoon, I now say that the open public
12 hearing session is now concluded.

13 GUEST PRESENTATION - DR. PARVIN WAYMACK

14 DR. WAYMACK: Okay, I'm Parvin
15 Waymack, Centers for Disease Control,
16 research chemist. For 17 years I was chief
17 of the lipid reference library.

18 We standardize HDL and LDL
19 cholesterol, and for many years, beginning
20 in '95, there was an ATP -- CDC is a partner
21 with NCPP, and standardizing risk factors
22 for cardiovascular disease.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 The first -- CDC follows the
2 recommendations of working groups like the
3 1995 working group, follows recommendations
4 of the NCPPP adult treatment panel working
5 with them as a partner. We standardized LDL
6 cholesterol through a cholesterol reference
7 method laboratory network. And we did this
8 on the basis of a recommendation that we
9 should use our HDL reference method, extend
10 it, because the database indicated that the
11 risk factors were LDL, IDL, and Lp(a). And
12 our method included those risk factors.

13 This is a definition of LDL
14 cholesterol that is actually within the
15 database. It's more than just LDL
16 cholesterol.

17 And we've found in standardizing
18 HDL and LDL cholesterol that the existence
19 of these subfractions are making the
20 practical assays, the routine assays, are
21 causing problems with standardization. So
22 that's how our interest -- clearly, small

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 dense LDL and subfractions are risk factors
2 within the LDL cholesterol.

3 LDL cholesterol is the
4 cornerstone for the ATP treatment panel.
5 Lowering LDL cholesterol is the cornerstone.

6 And this recent update shows that taking
7 all the way down to 40 milligrams per
8 deciliter was recommended, and of course
9 this is the first thing you have to realize
10 is that this is a result of population
11 studies. And yet it has to be translated
12 into recommendations for individuals.

13 So there is a large up and down
14 uncertainty around what would be for
15 individual patients.

16 Small dense LDL then is within
17 this population of LDL cholesterol. It's
18 very effective for treatment and management.

19 And the issue really is, within
20 this, we have small dense LDL, and you are
21 going to see some slides here you've seen
22 before. Because I've borrowed a lot of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 slides. It's a very eclectic set of slides.

2 You can measure -- let me go back
3 to that -- the key thing here that's been
4 successful is if you lower the LDL
5 cholesterol concentration one percent, you
6 lower the risk one percent.

7 If you measure Apo B as a
8 surrogate for the LDL particle you would see
9 a 1.1 percent lowering for every one percent
10 lowering.

11 So the issue is the LDL particle
12 concentration as the thing that is causing -
13 - is the true risk factor. At any
14 concentration, equal iso LDL concentration,
15 a small dense LDL is going to have more
16 particles, and that can be a confounding
17 factor then in using -- I don't know how
18 often it really affects the -- effective as
19 a treatment. But once you take it to a low
20 enough level you have effective treatment,
21 like taking LDL particles down.

22 One study showed that in 222

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 patients that the -- had no prior history of
2 cardiovascular disease that 70 percent
3 according to the ATP 3 didn't qualify for
4 pharmacotherapy.

5 And if you look at the general
6 population, the general risk category, using
7 these same criteria, which involves a
8 Framingham risk score, 35 percent at low
9 risk, 40 percent at intermediate risk.

10 And this is not an indictment of
11 the treatment guidelines for ATP3, it just
12 says there is another population there that
13 has other risk factors that are important.
14 It's not just LDL cholesterol and the lipids
15 that are causing this.

16 We have a complicated disease
17 process. And the emerging risk factors, the
18 lipoprotein subfractions are among those,
19 and their relations with metabolic syndrome.

20 So we have a complicated process with all
21 the initiation progression, and all the
22 factors that lead to different endpoints, we

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 have a lot of studies that have different
2 endpoints that we could possibly get
3 apparently different results.

4 The metabolic factor then
5 includes what we are talking about here
6 today, small dense LDL. Remnants lowered
7 level of HDL or small HDL particles. There
8 are two types of risk factors, then. There
9 are positive factors, and there are markers.

10 So you have to keep it clear when you are
11 talking about what kind of a risk factor,
12 there is a process for determining that.

13 This schematic represents the
14 smoking elevated H-LDL blood pressure
15 directly caused it, but the lipoprotein
16 subfraction then, experts have pretty much
17 said, these are markers clearly associated
18 with and predictive but not direct causes.

19 ATP3 emphasizes that we must have
20 standardized tests, and that's what I'm
21 talking about, standardization of the
22 prospect. There is no standardization for

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 subfractions. We have the LDL cholesterol
2 standardized within our network, plus or
3 minus two percent. The CDC network has LDL
4 plus or minus one milligram per deciliter
5 that interacts with the manufacturers. But
6 there is no standardization of any kind for
7 subfractions.

8 Again, characteristics of use, a
9 marker must have, right on top of the list,
10 it must be able to be standardized.

11 Okay, guidelines, let's talk
12 about guidelines a minute, just briefly, the
13 purpose of guidelines, and how they're
14 developed.

15 Their purpose is to allow the
16 latest scientific evidence to be applied to
17 clinical practice. And there is a process
18 for this, where we have -- it's useful, not
19 useful, or there's conflicting evidence or a
20 divergence of opinion.

21 And that pretty much describes
22 the situation with small dense LDL, and the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 lipoprotein subfractions.

2 You can categorize where you have
3 evidence if it's just a single study,
4 multiple studies, all the way down to just
5 the opinion, consensus opinion of the
6 experts.

7 NACB did have a meeting recently
8 when lipoprotein classes, empirical size,
9 were considered. The draft recommendation
10 was that risk assessment is the first step,
11 and second was lipoprotein subclass
12 determination is not recommended.

13 But let's look at this. That's
14 for initial; that's for primary prevention.

15 It is based on highest A level of evidence
16 in three, then, is the strongest meaning
17 it's just not useful.

18 Third recommendation, there is
19 insufficient data that measurement over time
20 is useful. Again, this comes from experts'
21 consensus. There is a controversy here,
22 disagreement, against the -- so this is the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 process.

2 But the third thing where it
3 comes to the standardization issue, clearly
4 it's saying that you need standardization of
5 the technology.

6 What is interesting to me is that
7 there is a divergence of opinion even on
8 this issue in favor of recommending it. But
9 that has to do with some people are saying,
10 don't standardize it. It's not even worth
11 standardizing if it's not useful.

12 Go back to 2001, the
13 recommendation for small LDL particles, was
14 not recommended because of three reasons.
15 It's not an independent risk factor, it's
16 not standardized methodology, and there's
17 not inexpensive methodologies available.

18 Of course the third one I think,
19 the inexpensive objection stated, there are
20 methodologies now. But still we're not
21 standardized.

22 What is the role of the practice

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 guidelines? The role clearly is to
2 implement state of the art cardiovascular
3 prevention. And the central role then of
4 the physician in this is to translate these
5 guidelines from population studies into
6 advice to an individual, and to exercise
7 clinical judgment in the process.

8 So if you look at ATP3, the term
9 clinical judgment is used 27 times. That's
10 the spirit of how it's done.

11 So that's fine there being merit
12 measured now. Is there -- definitely there
13 is an association with risk, and a metabolic
14 syndrome, and a clinical judgment of
15 physicians. A measurement is finding a
16 better way to characterize risk, and they
17 think there is more information for managing
18 treatment.

19 At the same time this does go
20 beyond the guidelines.

21 To put it another way, Hawkenson
22 (phonetic) in the Handbook of Lipoprotein

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 Testing says, intervention studies have
2 shown that small dense LDL predicts the
3 enzographic (phonetic) changes in response
4 to lipid lowering therapy, and converting
5 small dense LDL to buoyant LDL is associated
6 with CHD regression.

7 So again conflicting studies and
8 conflicting opinion.

9 Let's go to the standardization.

10 What are we standardizing here? We are
11 standardizing a type of particle that is
12 very heterogeneous. These are -- we have a
13 core that contains the triglycerides and
14 cholesterol esters. We have -- you couldn't
15 number the number of different possible
16 fatty acids involved in all these esters in
17 terms of the chemical composition so that's
18 too difficult to consider, we just assume
19 that's not a factor.

20 On the outside though then you
21 have the free cholesterol and the
22 phospholipids that this X-ray depiction does

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com