

Anatomie et Cytologie Pathologiques

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
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Docket N°03D0007

Estrogen and Estrogen/Progestin drug products to treat vasomotor symptoms and vulvar and Vaginal atrophy symptoms. Recommendations for clinical evaluation.

18 February 2003

To whom is concerned,

Pr Nogales and myself are involved as readers of endometrial biopsy slides in many studies evaluating the safety and efficacy of estrogen/progestin drug products (see CV) Most of these studies concern drugs to be developed in the European market. The industry follows the recommendations provided by the European Agency for the Evaluation of Medicinal products These recommendations are updated in accordance with the scientific advances made in this area. Being involved as experts for updating the European recommendations, we are interested by the FDA recommendations. We read carefully your draft guidance (**docket number : 03D0007**) published in January 2003 and have some comments concerning the monitoring and the Appendix histologic descriptions recommended for use when reading endometrial biopsy slides

258-260 (page 7)

For the efficacy evaluation, three independent expert pathologists, blinded to treatment group and to each other's readings, determine the diagnosis for endometrial biopsy slides during the conduct of the study

Do you mean that one pathologist will read the biopsy at screening and three pathologists read the final biopsy after 12-month of treatment

266-268 (page 7)

Standardized criteria as provided in Blaustein's pathology text (Pathology of the Female Genital Tract) be used for the diagnosis of endometrial hyperplasia (see Appendix for recommended histologic characteristics of the endometrium)

While the diagnosis of the different types of hyperplasia is well covered in many books of gynecological pathology such as Blaustein's or Haines and Taylor's pathology texts, the other types of benign endometrium are not so clearly defined. For instance, the difference between atrophic and inactive endometrium is not made in most books. We are surprised that the proliferative category has been divided in this working document in three subcategories which are not considered in any reference book. We do not know which are the criteria, or where the

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limit is drawn to differentiate a "weakly" versus "active" proliferative endometrium
Furthermore, the third category "disordered proliferative endometrium" is considered to be

nothing but a focal simple hyperplasia in the Blaustein's. This term is not considered by any classifications issued by International Agencies such as the WHO Thus, we believe that dividing proliferative into three entities which are not fully accepted by most gynecopathologists will lead once again to poor reproducibility, lacking any practical value in the evaluation of the endometrial tissue

269-270 (page 7)

Endometrial polyps be fully characterized as to the glandular proliferation and atypia (see Appendix for additional histologic characteristics of the specimen).

Do you mean that polyps with hyperplastic features and more at the end of the treatment have to be counted as an hyperplasia and thus a treatment failure? or do you believe that it has to be described as a different entity? At the initial screening, it is usually requested to remove polyps of any histologic type during hysteroscopy in order to prevent bleeding during treatment and improve the compliance. If it cannot be performed, the patient is excluded from the study. Considering this classification, what is the recommendation when a polyp is diagnosed at screening? Is this recommendation different according to the histologic type of the polyp?

279-282 (page 7)

For the efficacy evaluation, the concurrence of two of the three pathologists be accepted as the final diagnosis. If there is no agreement among the three pathologists, the most severe pathologic diagnosis (i.e., atypical hyperplasia > complex hyperplasia > simple hyperplasia > benign endometrium) would be used as the final diagnosis

This rule has been applied before only when a diagnosis of simple hyperplasia or more was diagnosed by one of two pathologists. In this case, a third pathologist had to be involved and the concurrence of two of the three was accepted as the final diagnosis. Now that three pathologists will read all the final biopsies, which diagnosis will be accepted as the final diagnosis if a different diagnosis of benign endometrium (atrophic versus proliferative versus secretory) is proposed by the three readers? Is it considered as benign endometrium only? If so, why to use a classification which include all the different types of benign endometrium?

We thank you very much for considering these comments and giving your answer when appropriate

Sincerely yours,


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CURRICULUM VITAE

Personal Data:

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SPECIAL APPOINTMENTS

- 1975: **Visiting Fellow** University of Southampton, U.K.
(Professor D. H. Wright)
- 1975-1980: **Guest Lecturer** for Postgraduate courses, University of Colorado, Aspen, Colorado (USA). Given Institute of Pathobiology.
- 1983: **Visiting Professor**, Department of Pathology, University of Colorado, Denver, Colorado (USA).
- 1992-96: **President, International Society of Gynecological Pathologists**
- 1993 **Academician** Royal Academy of Medicine
1995 **Scientific Advisor**, European School of Pathology,
Turin, Italy
- 2002 **Member**. Consensus Committee on Nomenclature of Gynaecologic Tumours WHO-IARC. Lyon. Francia
- 2002 **Advisor**. European Society of Pathology. Working Group on Gynaecological Pathology
- * * *

HONORARY APPOINTMENTS

Société Française de Gynéco-Pathologie 1993	<i>Membre d'Honneur</i>
Sociedad Cubana de Anatomía Patológica 1999	<i>Miembro de Honor</i>
Sociedad Colombiana de Anatomía Patológica 2000	<i>Miembro de Honor</i>
The Adriatic Society of Pathology 1999	<i>Honorary Member</i>
Asociación Peruana de Patólogos 2002	<i>Miembro de Honor</i>
Universidad Central de la Habana 2001	<i>Profesor de Honor</i>
Universidad Mayor de San Marcos, Lima 2002	<i>Profesor Invitado</i>

PARTICIPATION IN LEARNED JOURNALS

Histopathology (Blackwell). London	Member Advisory Board 1982-actual
Current Topics of Pathology (Springer). Heidelberg y New York	Member Editorial Board 1986-actual
International Journal of Gynecological Pathology (Raven Press).	
	New York
	Member Editorial Board 1986-actual
	Associate Editor 1994-1998
	Member Editorial Board 1998-actual
Current Diagnostic Histopathology (Churchill Livingstone). London	Member Advisory Board 1993-actual
Pathology Case Reviews (J.B. Lippincott). Philadelphia	Member Editorial Board 1995-actual

REVIEWER OF:

Virchows Archiv A. (Pathology)
International Journal of Gynecologic Cancer
Pathology Research and Practice
Obstetrics and Gynecology

European Journal of Obstetrics and Gynecology and Reproductive Biology.

Cancer (Philadelphia)

J Clin Pathol (London)

Path. Res Pract (Germany)

J clin Path (London)

Int J Surg Pathol (Milan)

Maturitas (Amsterdam)

Pathologist in various menopause studies with the following companies :

Solvay Arzneimittel, Postfach 22, D 30002 Hannover. Germany

Effik Laboratories, Burospace 7, 91571 Bievres. France

Merck Darmstadt, Postfach 64271, 64293 Darmstadt. Germany

Laboratoire Théramex, 6 Av. du Prince Héréditaire Albert. 98000 Monaco

IRIS- Servier, 6, Place des Pleiades, 92415 Courbevoie Cedex. France

MAINSTREAM PUBLICATIONS

International Books

- The Regeneration of Human Endometrium under normal and pathologic conditions. In: Mechanisms of Endometrial Bleeding. (Cook C. & Discfalusi M. Eds.) W.H.O. Geneva 1980
- Neural Tissue in Human Teratomas. In: The Biology of Teratomas. (Damjanov I. & Solter D. Eds.) Humana Press. Clifton N.J. 1983 ISBN 089603-040-7
- The Pathology of Germ Cell Tumours. In: Haines and Taylor's. Obstetrical and Gynaecological Pathology. 3rd Edition (Fox H. Ed.) Churchill Livingstone London 1987 ISBN 0-443-02405-7
- The Pathology of Germ Cell Tumours. In: Haines and Taylor's. Obstetrical and Gynaecological Pathology. 4th Edition (Fox H. & Wells M. Eds.) Churchill Livingstone. London 1995 ISBN 0-443-04537-2

- The Pathology of Human Yolk Sac In: Haines and Taylor's. Obstetrical and Gynaecological Pathology. 4th Edition (Fox H. & Wells M. Eds.) Churchill Livingstone. London 1995 ISBN 0-443-04537-2
- The Pathology of Germ Cell Tumours. In: Haines and Taylor's. Obstetrical and Gynaecological Pathology. 4rd Edition (Fox H. Ed.) Churchill Livingstone. ISBN 0-443-04537-2. London 2002
- Organization of a Department of Pathology. In: University Management Handbook; Development of modernized management structures. Åbo Academy Press. Åbo, Finland 2000 ISBN 92-12-0737-X
- **Nogales FF.** Talerman A, Kubik-Huch RA, Devouassoux-Shisheboran M, Tavassoli FA Ovarian germ cell tumours (2.3). WHO Classification of Tumours (Blue Books). III Pathology and Genetics of Tumours of the Breast and Female Genital Organs. Edited by F.A. Tavassoli and M.R. Stratton. IARC Lyon 2003 ISBN 92 8322412 4
- **Nogales FF.** Tumours and lesions of the rete ovarii (2.5) WHO Classification of Tumours (Blue Books). III. Pathology and Genetics of Tumours of the Breast and Female Genital Organs. Edited by F.A. Tavassoli and M R Stratton. IARC Lyon 2003 ISBN 92 8322412 4
- Silverberg SG, Kurman RJ, **Nogales FF.** Mutter GL, Kubik-Huch RA, Tavassoli FA, Roth LM. *Epithelial tumours and related lesions of the uterine corpus* (4.1) WHO Classification of Tumours (Blue Books). III. Pathology and Genetics of Tumours of the Breast and Female Genital Organs. Edited by F.A.Tavassoli and M.R. Stratton. IARC Lyon 2003 ISBN 92 8322412 4

SCIENTIFIC PAPERS

(does not include contributions in languages other than english)

Continuing Education Programs of the American Society Of Clinical Pathology

- ASCP Check Sample April 1977 Silverberg S. G. **Nogales F. F.**, ; Ovarian mucinous tumor of borderline malignancy.
- ASCP Check Sample June 1982, Silverberg S.G., **Nogales F.F.**; Endolymphatic Stromal Myosis.
- ASCP Check Sample September 1995; **Nogales F.F.**, Luna M.A.; Small cell epidermoid carcinoma with melanocyte colonization arising in a mature ovarian benign cystic teratoma.

Letters to the editor

1. **Nogales FF.** Primary chondrosarcoma of the ovary. (letter) *Histopathol* 6: 376-377; 1982
2. Urdiales-Viedma M; Martos-Padilla S; **Nogales FF**; Lopez-Yevenes A. Lymph node changes in echinococcosis [letter]. *Arch Pathol Lab Med* 108. 528; 1984
3. **Nogales FF**, Alvaro T, Fernández Ruiz PL. Alpha-fetoprotein positive globules in involuting human yolk sac. (letter) *Hum Pathol* 19: 995-996; 1988

4. Alvaro T, **Nogales FF**. Villous adenoma and invasive adenocarcinoma of the cervix. *Int J Gynecol Pathol* 7: 95-96; 1988
5. **Nogales FF**. Fatty change in the endometrium (letter) *Histopathol* 20: 599; 1992
6. **Nogales FF**. Myxoid endometriosis (letter) *Am J Surg Pathol* 19: 972; 1995
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16. **Nogales FF**. Prognostic factors in endometrial neoplasia: old and new. *Current Opinion in Obstetrics and Gynecology* 8: 74-78; 1996

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56. Fernández P. L, Merino M, **Nogales FF**, Charonis A, Stetler-Stevenson W, Liotta L. Immunohistochemical profile of basement membrane



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58. **Nogales FF**, Beltran E, Pavcovich M, Bustos M. Ectopic somatic endoderm in secondary human yolk sac. *Hum Pathol* 23: 921-924; 1992
59. Verdejo J.J, Fernández PL, Haddad A, Carriazo A. G, Zuluaga A, **Nogales FF**. Extra skeletal Ewing's Sarcoma Metastatic to Penis. *Brit J Urol* 70: 206-207; 1992
60. **Nogales FF**, Plata C, Ruiz Avila I, Concha A. Granulosa cell tumour with true hepatocytic metaplasia simulating luteinized stromal cells. *Am J Surg. Pathol* 17: 85-90; 1993
61. **Nogales FF**. Embryological clues to the yolk sac tumor group: The Robert Mayer Festschrift. *Int J Gynecol Pathol* 12: 101-107; 1993
62. **Nogales FF**, Martín F, Linares J, Naranjo E, Concha A. Myxoid change in decidualized scar endometriosis: A pseudomalignant histological appearance. *Cutaneous Pathol* 20: 87-91; 1993
63. **Nogales FF**, Ruiz Avila I, Concha A, Del Moral A. Immature endodermal teratoma of the ovary: Embryologic correlations and immunohistochemistry. *Hum Pathol* 24: 364-369; 1993
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65. González Moles MA; Ruiz Avila I; González Moles S; Martínez I; Ceballos A; **Nogales FF**: Detection of HPV DNA by *in situ* hybridization in benign, premalignant and malignant lesions of the oral mucosa. *Bull Group Int Rech Sci Stomatol Odontol* 37: 79-85; 1994
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67. López Beltrán A, **Nogales FF**, Donné C.H, Sayag J.L. Adenocarcinoma of the urachus showing extensive calcification and osseous metaplasia. *Urol Int* 53: 110-113; 1994
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- Bourse d'étude, Société pour la Recherche contre le Cancer Montréal, Québec
- Meilleure présentation par un résident, Congrès annuel de l'association des Pathologistes du Québec, 13 octobre 1986

SOCIETES**1987**

- International Society of Gynecological Pathology
- Club de Recherches cliniques du Québec

1989

- Société Française de Cytologie Clinique
- Société Française de Colposcopie et de Pathologie Cervico-Vaginale
- Société Française de Gynécologie

1990

- Conseil de Direction de la Société Française de Colposcopie et de Pathologie Cervico-Vaginale
- Membre du Jury de la Conférence de consensus sur le dépistage du cancer du col utérin Fédération des Gynécologues et Obstétriciens, XXXIII Congrès de la langue française Lille

1991

- International Academy of Cytology
- Comité d'organisation du projet CANOGEN du groupe PETRI
- Expert de la conférence de consensus morphologique sur les néoplasies du col utérin Paris-Tolbiac

1992

- Comité de Rédaction de Reproduction Humaine et Hormones
- Groupe d'Etude de l'Endométriose
- Evaluator in Cervicography valided by the European Society For Oncological Research
- Société Française d'Anatomie Normale et Pathologique
- Conseil scientifique de la Société Française de Cytologie Clinique

1993

- Comité Editorial de Références en Gynécologie et Obstétrique
- Secrétaire Adjointe du Bureau du Centre de Regroupement Informatique et Statistique d'Anatomie Pathologique en Ile de France (CRISAP-IDF)
- Membership of the International Society for the Study of Vulvar Disease
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- Groupe de travail sur la Pratique de frottis cervicaux pour le dépistage du cancer du col Agence Nationale pour le Développement de l'Evaluation Médicale (ANDEM)
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- Editorial Board of the International Journal of Gynecological Pathology

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- Groupe de travail sur les recommandations pour la pratique clinique Conduite à tenir devant un frottis anormal du col de l'utérus Agence Nationale d'Accréditation et d'Evaluation en Santé (ANAES)

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- Conseil d'Administration de la Société Française de Cytologie Clinique

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- Conseil d'Administration de l'Association Française d'Assurance de Qualité en Anatomie et Cytologie Pathologiques (AFAQAP)
- Editorial Board of the European Menopause Journal
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2000

- Comité Scientifique de Gynécologie Obstétrique Fertilité
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- Member of Scientific Advisory Committee (SAC) of the International Federation Cervical Pathology and Colposcopy (IFCPC)

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- Secrétaire du Bureau du Centre de Regroupement Informatique et Statistique d'Anatomie Pathologique en Ile de France (CRISAP-IDF)
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- Member of the HPV triage Group, Bethesda System Workshop, National Cancer Institute Bethesda (April 30 - May 2)
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- Member at large of the International Society of Gynecological Pathology
- Membre du Comité Technique Régional de dépistage des cancers Direction Régionale des Affaires Sanitaires et Sociales (DRASS) de la région Ile de France

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- Member of the Laboratory Guidelines Committee of the International Academy of Cytology
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PUBLICATIONS

Revues Internationales

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- 43 Mattsson LA , Christiansen C , Colau JC , Palacios S , Kenemans P , Bergeron C , Chevallier O , von Holst T , Gangar K Clinical equivalence of intranasal and oral 17 β -estradiol for postmenopausal symptoms Am J Obstet Gynecol 182(3) 545-51 2000
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- 45 Bergeron C Morphological changes and protein secretion induced by progesterone in the endometrium during the luteal phase in preparation for nidation Hum Reprod (15, suppl) 119-128, 2000
- 46 Delmas MC , Larsen C , van Benthem BV , Hamers F , Bergeron C , Poveda JD , Anzen B , van den Hoek JA , Meier F , Pena JM , Savonius H , Sperandeo D , Suligoi B , Vernazza P , Brunet JB , de Vincenzi I , for the European Study Group on Natural History of HIV infection in Women Cervical squamous intraepithelial lesions in HIV-infected women . prevalence, incidence and regression AIDS 14 (12), 1775-84, 2000
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- 48 Bergeron C Problems of endometrial histology interpretation Climacteric 3, 288-293, 2000
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- 52 Lecce G, Meduri G, Ancelin M, **Bergeron C**, Perrot-Applanat M, Presence of estrogen receptor beta in the human endometrium through the cycle expression in glandular, stromal, and vascular cells J Clin Endocrinol Metab 86,1379-86, 2001
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- 54 Mooney EE, Nogales FF, **Bergeron C**, Tavassoli FA Retiform Sertoli-Leydig cell tumours . clinical, morphological and immunohistochemical findings Histopathology (in press)

Revues Nationales

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- 2 **Bergeron C**, Ferenczy A. Screening devices for cervical and endometrial carcinoma. *Contemp Ob/Gyn* 28 : 55-66, 1986.
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- 17 Bergeron C Transmission non sexuelle des lésions anogénitales à HPV Gynécol 42 49-51, 1991
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