

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION
CENTER FOR DRUG EVALUATION AND RESEARCH

ARTHRITIS ADVISORY COMMITTEE

Monday, July 29, 2002

8:00 a.m.

Holiday Inn Bethesda
Versailles I and II
8120 Wisconsin Avenue
Bethesda, Maryland

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Gary S. Firestein, M.D., Chairman
Kathleen Reedy, R.D.H., M.S., Executive Secretary

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ARTHRITIS ADVISORY COMMITTEE

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Charles H. McLeskey, M.D.

GUESTS

David Borenstein, M.D.
John T. Farrar, M.D. MSCE
Vibeke Strand, M.D.

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

2 Call to Order and Introductions

3 DR. FIRESTEIN: Welcome to everybody to
4 this meeting of the Arthritis Advisory Committee
5 along with a number of esteemed guests.

6 My name is Gary Firestein. I am the chair
7 of the committee. Before we get started with the
8 actual agenda, because there are so many new people
9 here today, it might be valuable to go around and
10 have everybody around the table introduce
11 themselves briefly.

12 As I said, I am Gary Firestein. I am from
13 UC/SD and I am a rheumatologist.

14 Why don't we go around to my left.

15 DR. SHERRER: I am Yvonne Sherrer. I am a
16 rheumatologist. I am from Fort Lauderdale.

17 DR. CUSH: Jack Cush. I am a
18 rheumatologist from Presbyterian Hospital of
19 Dallas.

20 DR. CALLAHAN: Leigh Callahan. I am an
21 epidemiologist from the University of North
22 Carolina in Chapel Hill.

23 DR. WOOD: I am Alastair Wood. I am a
24 clinical pharmacologist from Vanderbilt.

25 DR. DAVIDOFF: I am Frank Davidoff. I am

1 an internist and a recovering journal editor.

2 MS. McBRAIR: Wendy McBair. I am a nurse
3 and health educator from Virtua Health in New
4 Jersey.

5 DR. WOOLF: Clifford Woolf. I am a
6 biologist from Massachusetts General Hospital and
7 Harvard Medical School.

8 DR. DIONNE: Ray Dionne, clinical
9 pharmacologist, National Institute of Dental and
10 Craniofacial Research.

11 DR. MAX: Mitchell Max, neurologist,
12 National Institute of Dental and Craniofacial
13 Research.

14 DR. WITTER: Jim Witter from the FDA.

15 DR. SIMON: I am Lee Simon, Division
16 Director of 550, FDA.

17 DR. McLESKEY: Charley McLeskey, an
18 anesthesiologist, serving as the industry
19 representative here from Abbott Labs.

20 DR. STRAND: Vibeke Strand. I am a
21 rheumatologist, teach at Stanford, and work as a
22 consultant.

23 DR. BORENSTEIN: David Borenstein,
24 rheumatologist, Clinical Professor at George
25 Washington University.

1 DR. FARRAR: John Farrar. I am a
2 neurologist interested in pain management at the
3 University of Pennsylvania.

4 DR. ELASHOFF: Janet Elashoff,
5 biostatistics, Cedars-Sinai and UCLA.

6 DR. ASHBURN: Michael Ashburn,
7 anesthesiologist, from the University of Utah.

8 DR. ANDERSON: Jennifer Anderson,
9 statistician, from Boston University Medical
10 Center.

11 DR. KATZ: Nathaniel Katz. I am a
12 neurologist at Harvard Medical School.

13 DR. MANZI: Susan Manzi. I am a
14 rheumatologist from the University of Pittsburgh.

15 DR. ABRAMSON: Steve Abramson,
16 rheumatologist, NYU and Hospital for Joint
17 Diseases.

18 DR. KATONA: Ildy Katona, pediatric
19 rheumatologist, from the Uniformed Services
20 University.

21 DR. BRANDT: Ken Brandt. I am a
22 rheumatologist from Indiana University.

23 MS. REEDY: Kathleen Reedy, Food and Drug
24 Administration.

25 DR. FIRESTEIN: As I mentioned, we do have

1 a very full schedule and we have a large number of
2 people in this committee today, so it will be
3 impossible for everybody to take the podium for
4 prolonged presentations, and I would just ask the
5 members of the committee to try to keep comments to
6 the point, so that everybody can have an
7 opportunity.

8 We will begin the meeting with a meeting
9 statement read by Kathleen Reedy.

10 Meeting Statement

11 MS. REEDY: This is the meeting statement
12 for the Arthritis Advisory Committee meeting on
13 July 29th and 30th, 2002.

14 The following announcement addresses the
15 issue of conflict of interest with regard to this
16 meeting and is made a part of the record to
17 preclude even the appearance of such at this
18 meeting.

19 The Food and Drug Administration has
20 approved general matters waivers for the following
21 special government employees which permits them to
22 participate in today's discussions: Gary
23 Firestein, Kenneth Brandt, Ildy Katona, Yvonne
24 Sherrer, Susan Manzi, Jennifer Anderson, John Cush,
25 Alastair Wood, Nathaniel Katz, Michael Ashburn,

1 Janet Elashoff, Mitchell Max, Raymond Dionne,
2 Steven Abramson.

3 A copy of the waiver statements may be
4 obtained by submitting a written request to the
5 Agency's Freedom of Information Office, Room 12A-30
6 of the Parklawn Building.

7 In addition, Leigh Callahan, Frank
8 Davidoff, Wendy McBair do not have any current
9 financial interests in pharmaceutical companies,
10 therefore, they do not require a waiver to
11 participate to today's discussions.

12 We would like to note for the record that
13 Ms. McBair's employer's interests in two drug
14 companies are exempt under 2640.203(g).

15 The topics of today's meeting are issues
16 of broad applicability unlike issues before a
17 committee in which a particular product is
18 discussed, issues of broad applicability involve
19 many industrial sponsors and academic institutions.
20 The committee participants have been screened for
21 their financial interests as they may apply to the
22 general topics at hand. Because general topics
23 impact so many institutions, it is not prudent to
24 recite all potential conflicts of interest as they
25 apply to each member, consultant, and guest.

1 FDA acknowledges that there may be
2 potential conflicts of interest, but because of the
3 general nature of the discussion before the
4 committee, these potential conflicts are mitigated.

5 We would like to note that Dr. Charles
6 McLeskey is participating in today's meeting as a
7 non-voting industry representative. As such, he
8 has not been screened for conflicts of interest.

9 In the event that the discussions involve
10 any other products or firms not already on the
11 agenda for which FDA participants have a financial
12 interest, the participants involvement and their
13 exclusion will be noted for the record.

14 With respect to all other participants, we
15 ask in the interest of fairness that they address
16 any current or previous financial involvement with
17 any firm whose product they may wish to comment
18 upon.

19 DR. FIRESTEIN: Thank you very much.

20 Now we will move on to the Welcome from
21 Dr. Simon.

22 Welcome

23 DR. SIMON: Thank you, Gary, and I would
24 like to welcome the committee. We are grateful
25 that you are willing to come, take time out of your

1 practice and busy days to join us here in this
2 rather hot and humid land, but nonetheless, the
3 fact that you have been able to take time out
4 Monday and Tuesday, we are quite grateful about.

5 We recognize that much of what you do here
6 is done involuntarily and we recognize that that is
7 a burden and the government appreciates your
8 commitment.

9 Having been recently on the other side of
10 this microphone and having sat around the table
11 with you as a committee member previously, I can
12 appreciate really what it takes to do this, so
13 thank you.

14 I want to make clear that this meeting is
15 the first of many meetings in an iterative way for
16 us in 550, and hopefully other divisions in the
17 future, to participate with you all in discussing
18 issues of pain, which we find a very critical time
19 in the development of new therapies for pain.

20 We have advanced the science of
21 understanding mechanisms and we believe that part
22 of our role at the FDA is to foster new therapeutic
23 development by discussing all different kinds of
24 ways to look at pain indications and how one would
25 approve such drugs. We believe that these kinds of

1 discussions will allow us to further understand
2 better how to create and construct guidances for
3 industry.

4 Much of what we will discuss today will
5 not, and has not, been generally discussed within
6 the entire FDA. I would like to make clear that
7 much of the discussion will inform us in 550, the
8 Analgesics Anti-inflammatory and Ophthalmologic
9 Product Division, about issues that we have been
10 grappling with and have been advising industry
11 about, about the products that we are responsible
12 for.

13 However, much of what we will discuss
14 today will be brought back for further discussions
15 with other divisions, such as 170, Anesthetics and
16 Critical Care, that is particularly interested in
17 this topic since they are responsible for drugs
18 like opioids.

19 So, we feel very strongly that today's
20 discussion, although not directly product oriented,
21 will help us and inform us significantly about
22 where we are going in the future in guidance
23 development.

24 So, again, thank you very much, and I will
25 turn the meeting back to Gary.

1 DR. FIRESTEIN: Thank you, Lee.

2 We will move ahead now with an
3 introduction to the topic from Dr. Witter.

4 Introduction
5 James Witter, MD., Ph.D.

6 DR. WITTER: Good morning. Thank you,
7 Gary, Dr. Simon.

8 I am the clinical team leader in 500 and,
9 as such, I would like to thank the members of the
10 team that have spent a lot of time and energy
11 getting ready for today. I particularly would like
12 to acknowledge the help of Barb Gould and I think
13 you will appreciate some of her work here shortly.

14 [Slide.

15 In case you missed it, we are here to talk
16 about pain, and pain is one of those words that
17 even, standing alone, evokes an emotion out of I
18 think everybody. Maybe, in fact, some of you have
19 some of this right now. It is generally not a good
20 emotion, though.

21 [Slide.

22 Pain is really quite fascinating because
23 it is, in one way, the ultimate symptom and
24 therefore, the target for drug development, which
25 is part of the interest today, but it crosses some

1 magical line and can become a disease, which we
2 talked about at a meeting just down the street a
3 couple of months ago. So, it kind of goes through
4 what we might think of as I guess a phenotypic
5 change.

6 [Slide.

7 The purpose of the meeting really, then,
8 is what we are going to try and do is simplify
9 things down to concepts and really examine two main
10 aspects of pain and its relief. One of those is
11 how have analgesics been studied and labeled to
12 date, and how should analgesics be studied and
13 labeled in the future.

14 The ultimate goal, then, is to inform
15 analgesic labels in a meaningful way for both
16 patients and clinicians. So, a lot of the focus is
17 going to be a discussion of labels.

18 [Slide.

19 Let's starts off with some definitions
20 then. Can we say, then, that since acute pain is
21 generally considered a self-limiting condition,
22 that that should inform us on how the drug should
23 be studied, labeled, and used? Use is what we are
24 particularly concerned about because we know that
25 off-label use has resulted in serious adverse

1 events and death with certain analgesic drugs in
2 the past.

3 [Slide.

4 Can we, on the other hand, say that
5 chronic pain is defined as daily or intermittent
6 pain that occurs either on or off medication and
7 lasts more than 3 months for patients who do not
8 have cancer, but lasts more than 6 weeks for those
9 who have cancer, if what we are trying to do is
10 recruit patients into trials, we don't want to keep
11 them out, particularly those that have cancer.

12 [Slide.

13 So, I am going to ask you to answer a
14 series of questions in your head. Please don't
15 raise your hand unless they apply.

16 But I would like to know: Who has never
17 experienced pain? Who thinks that pain doesn't
18 hurt? Who thinks that pain doesn't interfere with
19 your activities? And who thinks pain doesn't
20 impact your life?

21 I see no hands.

22 [Slide.

23 So, do we then have an agreement,
24 unspoken, that an analgesic should: relieve pain,
25 should improve function, should improve quality of

1 life, and do so in a safe manner?

2 And this is important. The other side of
3 the equation from working is safety, and we are
4 going to talk about that today and tomorrow also,
5 but it is always going to be I think in the back of
6 our minds.

7 [Slide.

8 As I mentioned earlier, we are really
9 going to be focusing on labeling, so if you look in
10 the draft OA or in the RA guidance document, you
11 will see something that states the following:

12 "Although label claims have legal and regulatory
13 uses, their central purpose is to inform
14 prescribers and patients about the documented
15 benefits"--and I have inserted in here (and
16 risk)--"of a product."

17 [Slide.

18 Now, this isn't the first time that we
19 have talked about labels and analgesics. We did so
20 about four years ago. We took only one day, and I
21 think by the end of tomorrow, you will realize that
22 that was not sufficient. We broke it up into a
23 morning and afternoon session, and I think I see
24 some people that were here then.

25 The morning session, we really discussed

1 the onset of pain relief, what we call fondly,
2 internally, the "fast-faster" wars, and we also
3 studied design of Rx prescription/OTC analgesics.

4 In the afternoon, we devoted it to pain
5 claim structures for both acute and chronic pain.

6 [Slide.

7 We asked some questions, as we usually do,
8 of the Advisory Committee. We asked: Should pain
9 claims be categorized as: for acute versus chronic
10 versus unrestricted or I guess general pain claims?
11 Should they be by categories, for example,
12 neuropathic pain, or should they be by
13 subcategories, for example, diabetic neuropathy?

14 [Slide.

15 We also then asked: Of these studies, how
16 many should there be, how long should they be, what
17 kind of pain "models" should we be using to inform
18 such labels, and what is this concept of
19 "clinically meaningful" benefit and how should it
20 be determined in both the setting of acute and
21 chronic pain?

22 [Slide.

23 But we are here to talk about the future,
24 so what we are going to be discussing throughout
25 these two days are some ideas about how to move

1 forward and how to make pain claims for the future,
2 and what we might able to do, for example, is break
3 them up into two basic categories, a clinical and a
4 mechanistic.

5 Clinical is first because, as I mentioned
6 before, pain is the ultimate symptom, so we need to
7 make sure that we address that. Tomorrow, in
8 particular, we are going to be discussing the acute
9 pain setting and, in particular, what we have
10 called the ABC's of doing studies to look at
11 analgesics in the acute situation.

12 Later today, we will be talking more about
13 chronic and what those studies should be, in
14 particular, then labels that should have a specific
15 chronic claim, such as osteoarthritis, which we
16 routine give out in the division, or should we
17 talking about more general claims, replicates of
18 three models, which Dr. Simon will be going into in
19 just a bit, but I think one thing that Dr. Simon is
20 going to stress is that we are trying to set up
21 many ways, particularly for chronic pain, many ways
22 to get approved.

23 Then, I think we are going to be
24 discussing some mechanistic approaches or what we
25 might call some bridging studies, and I will talk

1 about that in a bit.

2 [Slide.

3 So, let's just stop for a moment and think
4 about a mechanistic claim. We don't have such a
5 thing, but we wonder what it might look like if we
6 did have one, would it look like, for example,
7 something that would say prevents neuroplasticity,
8 does that make sense to people, or reducing
9 prostaglandin levels, or reducing substance P in
10 CSF, are those the kinds of things that we would
11 mean by a "mechanistic claim."

12 [Slide.

13 So, mechanisms, I have come up with
14 something here called "Mechanisms of Total Pain
15 Relief," and this is a hypothetical model--and
16 please blame me for anything that is wrong
17 here--but let's just say that we can categorize
18 things in terms simply of we will call them Factor
19 X, which are NSAIDs, and like-related compounds,
20 Cox-2's, for example, and let's take a Factor Z,
21 which are opioids and related compounds, tramadol,
22 for example, and then Factors Y, which are future
23 drugs either in development or still in somebody's
24 mind somewhere.

25 Let's say that these then contribute to

1 this called chronic pain.

2 [Slide.

3 If we do some mathematics on this, can we
4 say that--let's form some hypotheses here. Can we
5 say Hypothesis 1, for example, that if you take any
6 X or any NSAID, and you add that to any Z or any
7 opioid, you will get 100 percent pain relief, is
8 that the correct hypothesis?

9 Or is it, Hypothesis 2, that we take any
10 combination of X and any combination of Z, we have
11 to add in something else, something else that is
12 missing, the Y factor, to really get 100 percent
13 pain relief?

14 [Slide.

15 Now, once we have answered or tried to
16 answer that, then maybe we then have developed a
17 plan for everybody. Plan 1, for example, going
18 back to Hypothesis 1, would be, well, we really
19 have all we need out there. All we need to do is
20 improve the safety of these existing compounds.

21 Or do we say Hypothesis 2 is true, and
22 sure, of course, we want to optimize use of
23 existing drugs, but what we really need to do is
24 develop and improve new drugs.

25 If that doesn't work, we have an

1 alternative plan and we are ready to go here, we
2 have the extra strength pain relief--and thank you,
3 Barb.

4 [Slide.

5 So, I think it is important, the ideas
6 that we discuss today, they sift down, they
7 eventually become drugs. They get into research,
8 both pre- or non-clinical and clinical. If they
9 are lucky, they come to us. If they are lucky
10 again, they get labeled and they get out there for
11 use.

12 [Slide.

13 We are very much a part of this process,
14 and we have become more so thanks to the help of
15 Dr. Meyer Katzburg, who I would like to acknowledge
16 for all his work in setting up what we now have as
17 we are live on the air. The Division has a web page
18 accessible through--go to the CDER web site. You
19 will see there is an announcement of this web page.
20 We are excited about it, it is still growing, and
21 we would love your comments. I can assure you what
22 you send to us, we will all read it, so make it
23 good.

24 [Slide.

25 A couple of months ago I had the pleasure

1 and pain experience to work with Dr. Dionne, who is
2 sitting here today, on the NIH-FDA Analgesic Drug
3 Development Workshop.

4 [Slide.

5 We had some objectives for that workshop.

6 We wanted to define pain in terms of the unmet
7 needs for pain management and where to go for unmet
8 needs in terms of pain research, and we discussed
9 how to harness the emerging technologies and
10 improve the development and ultimate FDA approval
11 of new therapies.

12 [Slide.

13 Of course, we had some outcomes and
14 suggestions from this. There was a concern that
15 this separation of pain into acute and chronic may
16 miss addressing the nervous system "plasticity"
17 that many feel goes on.

18 It was acknowledged that there is no
19 consensus for a pain metric, but that one, in fact,
20 needs to be developed to allow for comparisons and
21 poolings of results across the analgesic trials.

22 There was a lot of discussion as to
23 whether new analgesics need to be evaluated as
24 supplementary medications on existing ones because
25 that represents more accurately the pattern of

1 clinical use.

2 [Slide.

3 We talked about the need for new therapies
4 to treat pain mechanisms and we talked about how to
5 translate these scientific advances into improved
6 pain relief when it comes down it, it is going to
7 really take a cooperative effort between academics
8 and industry and the regulatory agencies, such as
9 us.

10 Then, we talked about the FDA guidance of
11 1992 and how it needs revision. Let me just talk
12 about that. Dr. Fang will be discussing it in much
13 more detail.

14 [Slide.

15 Let me just mention to you, so that we are
16 on the same page, that the document really
17 discusses analgesic approaches in the 1980's, and
18 if you read it, it assumes that revision would be
19 necessary with time, so I think we all are in
20 agreement that we have arrived.

21 Maybe one of the most distressing features
22 is that it encourages "me too" types of drugs
23 rather than encouraging the "me first" types of
24 drugs that I think we all agree we need in the
25 future.

1 So, without further delay, I would like to
2 introduce Dr. Christina Fang from the FDA.

3 I have omitted here, my mistake, I am
4 sorry, Dr. Sharon Hertz, also from FDA, will be
5 discussing the '92 guidance document and some of
6 the positives and negatives from that.

7 We will have Dr. Clifford Woolf from the
8 Mass. General talk to us about the issue of
9 plasticity, our own Lee Simon, who will be
10 discussing the pain claim structure, and Dr.
11 Borenstein will talk to us about what might be one
12 of those new indications in particular lower back
13 pain.

14 Thank you.

15 DR. FIRESTEIN: Thank you very much.

16 As you noted, we are going to move ahead.
17 If the FDA is going to revise the 1992 guidance, it
18 might be useful to first review what they are.

19 So, Dr. Christina Fang and Dr. Sharon
20 Hertz will do that now.

21 1992 Guidelines

22 Christine Fang, M.D.

23 DR. FANG: Good morning. My name is
24 Christina Fang. I am a medical reviewer for the
25 Division of Anti-inflammatory Analgesics and

1 Ophthalmic Drug Products.

2 [Slide.

3 I am going to talk about 1992 analgesic
4 guidance document and the current issues.

5 [Slide.

6 The 1992 Guideline for the Clinical
7 Evaluation of Analgesic Drugs had provided the
8 guidance to analgesic drug development and the
9 research in last 10 years. It was originally
10 developed with the focus on NSAIDs and opioid type
11 drugs.

12 With the emerging new molecular entities
13 and with our growing knowledge about analgesics and
14 analgesia, we see the need to resolve many major
15 issues.

16 [Slide.

17 The major areas for improvement in 1992
18 guidance document will be presented at the
19 subsequent slides. Each will be followed with a
20 brief discussion on major issues.

21 [Slide.

22 The 1992 Guidance document recommended the
23 analgesic indications to be for the management of
24 pain. It is stated that evidence of pain. It is
25 stated that evidence of pain of several different

1 etiologies will justify general purpose analgesic
2 labeling, also the inclusion of specific labeling
3 indications for preoperative medication, for
4 support of anesthesia, for obstetrical analgesics,
5 or the dysmenorrhea requires specific studies.

6 [Slide.

7 How general and how specific the
8 indications should be has always been in debate.
9 The indication recommended should be based on the
10 number of acute and chronic pain model studies.

11 All the analgesics should be studied
12 sufficiently to include representative
13 subpopulations of major types of pain. The purpose
14 is to provide guidance to practitioners and to
15 minimize unsafe and ineffective off-label use.

16 In terms of specific indications, there
17 are some limitations. For example, we are not able
18 to study all of the indications because of the lack
19 of model sensitivity. If a drug only works for
20 very specific indications, it should be
21 demonstrated that the drug has unique
22 pharmacodynamic activities directed only at the
23 specific indication.

24 [Slide.

25 Acute and chronic indications. This topic

1 has always been in debate, as well. We see the
2 need to study the short-term and long-term
3 efficacy, but how much should we have regulatory
4 requirement in terms of models, in terms of
5 replications, we see the same model and the
6 different models, and in terms of length of study.

7 How short-term or the multiple-dose study
8 will help us to study the initial dosing regimen to
9 see if loading dose is necessary and to determine
10 optimal dosing interval.

11 [Slide.]

12 In the discussion of chronic studies, the
13 1992 Guidance stated that the focus of the
14 multiple-dose studies of more than 2 to 3 days in
15 duration is to provide documentation of clinical
16 acceptability and the safety of the test drug
17 rather than providing pivotal proof of efficacy.

18 [Slide.]

19 Today, we no longer think of studies of 2
20 to 3 days in duration as chronic studies. We need
21 to determine the length for long-term efficacy
22 study. If adequately designed and well controlled,
23 the long-term studies should be able to provide
24 pivotal proof of efficacy.

25 It is especially valuable for drugs with

1 delayed onset. The reason we ask for long-term
2 studies is because we see the problem with
3 off-label use for chronic pain. Also, these
4 long-term studies will provide useful information
5 for product labeling, about long-term benefit-risk
6 ratio and the durability effect.

7 [Slide.

8 In terms of pain models, the 1992 Guidance
9 stated that the selection of pain model depends on
10 the strength of analgesia, route of administration,
11 model sensitivities, active controls, and mechanism
12 of action.

13 Also, the initial Phase II studies should
14 explore a wide enough range of pain models.

15 [Slide.

16 We see the need for more acute and chronic
17 pain models because we only have limited models for
18 study of acute pain and most of which were
19 developed for the development of NSAID type drug
20 and also we have limited models for chronic pain,
21 and most of those to be studied were
22 musculoskeletal in origin.

23 We also see the need for models to study
24 the worst type of pain because of the dosing
25 regimen that could be different for this kind of

1 setting, and maybe there is a need for concomitant
2 and rescue analgesics.

3 [Slide.

4 In terms of dosing, the 1992 Guidance
5 stated that Phase II studies "should explore the
6 entire dose-response curve of the test drug and
7 should be the basis for selecting the dose used in
8 later Phase II and Phase III studies."

9 Phase III studies are "intended to assess
10 the effectiveness of the recommended dosage
11 schedule under conditions of use."

12 [Slide.

13 We see the need for studying both dose
14 levels and dosing intervals at acute and chronic
15 settings. The dosage obtained from acute setting
16 may not apply to chronic use, and the dosing
17 recommendations should be based on optimal
18 benefit-risk ratio rather than dosing many for
19 convenience.

20 We should also differentiate fixed dosing
21 in clinical trials for establishing efficacy from
22 the variable dosing used in clinical practice.

23 [Slide.

24 In terms of efficacy parameters, the 1992
25 Guidance stated that, "The development program for

1 an analgesic should collect data to describe
2 adequately onset of effect, peak effect, and
3 duration of effect. There many ways to collect
4 data on these measures of efficacy."

5 Then, there is a long list of measured and
6 derived parameters in the 1992 Guidance document.

7 [Slide.

8 The choice of efficacy parameters should
9 be based on minimizing bias, demonstrating time
10 course of effect, and providing useful information
11 for dosing recommendations.

12 Pain curves, onset, and the duration
13 should all be studied using valid and reliable
14 tools, and should be studied for both acute and
15 chronic settings.

16 [Slide.

17 For chronic pain evaluations should
18 determine how much the pain-related functional
19 status and the patients global satisfaction should
20 be used for primary or supportive evidence.

21 [Slide.

22 In terms of study controls, the 1992
23 Guidance recommends the placebo and active control
24 for single-dose study, the active control or
25 placebo control with rescue for short-term,

1 multiple-dose study, and active control for
2 long-term or multiple-dose study.

3 [Slide.

4 We see the need for adequate controls in
5 both acute and chronic analgesic studies. The
6 placebo controls should always be considered
7 whenever applicable because of the high placebo
8 response in analgesic trials.

9 The superiority design versus equivalence
10 design should be planned accordingly. There are
11 some special considerations for chronic studies in
12 terms of differential dropout rates and in terms of
13 how to keep blinding intact if there are different
14 safety profiles between the drugs to be compared.

15 [Slide.

16 In terms of effect and sample size, the
17 1992 Guidance stated that the calculation of sample
18 size "depends on the variance, the magnitude of
19 difference to be detected, and the desired power."

20 Special consideration should be given to
21 the "validity and the implications of the clinical
22 significance of the differences or similarities to
23 be detected."

24 [Slide.

25 How do we determine clinically meaningful

1 effect size has been a debate. There is no
2 consensus on how to define up-to-date. There are
3 did approaches. Whichever approaches are used, a
4 wide database should be applied. The sample size
5 determination is closely related to the
6 determination of clinically meaningful effect size.

7 [Slide.

8 In terms of safety, the 1992 Guidance
9 stated that for peripherally acting or NSAID oral
10 analgesics, the study should regular dosing for a
11 least 6 months. For centrally acting oral
12 analgesics, there should be regular dosing for at
13 least 1 month, continuing for at least 3 months if
14 feasible. For oral combination analgesics, the
15 studies should have regular dosing for at least 1
16 month.

17 [Slide.

18 We see the need to study the safety in
19 terms of the relationship between extent of
20 exposure and adverse events. The extent of
21 exposure includes the level of exposure and the
22 length of exposure.

23 We see the need to study the maximum
24 recommended dosing proposed. The ICH guidelines
25 for chronic pain only provides the minimum

1 requirement for minimal number of subjects and the
2 length of exposure.

3 There may be a need to study the
4 representative study population. There may be a
5 need to study the special population with high
6 risks. The large safety trial may be needed if
7 there are serious safety concerns.

8 [Slide.

9 In terms of opioid sparing, we need to
10 determine the clinical relevance of opioid sparing.
11 We need to see the extent of dose sparing that is
12 clinically meaningful.

13 We need to decide if opioid sparing could
14 be discussed in terms of concurrent analgesics or
15 in terms of adjuvant analgesics. For opioid
16 sparing study design to be treated as a concurrent
17 analgesic, there should be consideration of
18 standardization of opioid use and also the data
19 analysis that combines pain data and the rescue
20 medication data, and we need to determine how to
21 evaluate efficacy and safety for this kind of use.

22 [Slide.

23 You can see we have many issues to be
24 resolved. We need a strong need to updating 1992
25 Guidance document. We see the need for proposals

1 for future analgesic research. There is also the
2 need for consensus among researchers, drug
3 sponsors, and the regulatory agency.

4 Here, I am just introducing the general
5 concepts and the details will be discussed by my
6 colleagues in the subsequent presentations.

7 Thank you very much.

8 DR. FIRESTEIN: Thank you very much.

9 Now we will go to the second half of this
10 presentation by Sharon Hertz.

11 Sharon Hertz, M.D.

12 DR. HERTZ: Thank you.

13 [Slide.

14 First of all, I would like to thank Dr.
15 Simon and his division for inviting us to
16 participate in this Advisory Committee. I am from
17 the Division of Anesthetics, Critical Care, and
18 Addiction Drug Products. As many of you may know,
19 we also work with a lot of the analgesic products.
20 I am going to present some highlights from
21 our internal discussions on analgesics development,
22 and there will be some overlap with Dr. Fang's
23 presentation. I think what may come out is that
24 there is tremendous overlap in the Division's
25 concerns and in a lot of our approaches to this

1 process.

2 [Slide.

3 The 1992 Guidance has been in use for over
4 a decade and we know that subsequent advances in
5 pain research and in pain management really are
6 calling for new approaches to analgesics
7 development.

8 The 1992 Guidance places what we feel is
9 an undue emphasis on models rather than on really
10 looking at particular clinical settings of intended
11 use and target populations, and this has led to
12 some ambiguous labeling and perhaps an inadequate
13 exploration of drugs in the context of the actual
14 clinical use.

15 [Slide.

16 We think that the guidance lacks an
17 adequate emphasis on Phase II dose finding and we
18 have seen many development programs that have come
19 through with very abbreviated Phase II programs.

20 [Slide.

21 There is not an adequate addressing of
22 duration of clinical trials, particularly for drugs
23 intended for chronic administration, and study
24 designs that are recommended in the guidance are no
25 longer considered practical and have been shown to

1 lead to somewhat ambiguous results.

2 [Slide.

3 Selection of adequate control groups, as
4 described in the current ICH guidelines, has
5 replaced some of the older thinking represented in
6 the older guidance.

7 [Slide.

8 While the 1992 Guidance makes a
9 distinction between pain due to inflammatory and
10 noninflammatory conditions, it fails to recognize
11 the greater variability in pain etiologies and how
12 this may impact on the response to different
13 analgesics.

14 [Slide.

15 Here are some of the basic development
16 points that we tend to focus on and request when we
17 discuss program development with sponsors.
18 Obviously, for Phase I, we like to see an adequate
19 characterization of the PK profile, but not just
20 for single dose, but also multiple dose studies.

21 We like to see preliminary safety and
22 tolerability over a very broad range of doses
23 potentially anticipating what will be used later
24 on.

25 [Slide.

1 During Phase II, we like to see the
2 product explored in potential target populations.
3 Pain conditions identified as responsive in
4 preclinical trials or experience with drugs of a
5 similar class may help define populations to begin
6 exploring during Phase II.

7 [Slide.

8 Analgesics are rarely used only as a
9 single dose agent, so single dose studies shouldn't
10 be proposed for support of marketing applications.
11 Rather, these should be used more to explore early
12 on, analgesic properties.

13 [Slide.

14 We like to see a wide exploration of
15 dosing during Phase II to help inform what would be
16 appropriate arms in Phase III trials.

17 [Slide.

18 Phase II provides a lot of very important
19 opportunity to explore outcome measures and
20 determine what approach is most likely to
21 demonstrate the best way to demonstrate efficacy of
22 this particular product.

23 [Slide.

24 Is there a subgroup that responds well,
25 suggesting a responder analysis is a better primary

1 analysis? If so, what are the characteristics of
2 that group? Or do most patients exhibit a moderate
3 but important improvement suggesting an analysis of
4 mean scores as most informative?

5 [Slide.

6 Are there products that are already
7 approved that are better than the studied product,
8 so that even though the study drug beats placebo,
9 it doesn't necessarily lend itself to the target
10 population in that study, that there may, in fact,
11 be another, better indication for the product?

12 [Slide.

13 During Phase III, we ask the sponsor to
14 consider ways to prospectively define a clinically
15 meaningful response for the primary pain variables,
16 preferably using validated measures. As Christina
17 mentioned, this is a very difficult thing to do,
18 because we don't necessarily know yet what
19 clinically meaningful represents.

20 We really prefer the use of validated
21 measures particularly for the primary outcomes.

22 [Slide.

23 For a product likely to be used
24 chronically, we request studies of adequate
25 duration. Typically, we request 12 weeks on final

1 titrated dose. This affords an opportunity to
2 assess durability and it is a concept, the 12-week
3 concept is also used for other products in other
4 areas of the Agency.

5 [Slide.

6 Also, for our particular drug groups,
7 particularly the opioids, these 12-week studies can
8 offer an opportunity to provide information
9 concerning tolerance if designed accordingly.

10 [Slide.

11 Efficacy needs to be replicated, not
12 necessarily in an exactly duplicated design, but in
13 a similar population, and these studies are going
14 to provide the basis for informing the label and
15 how the product is to be used.

16 We look forward to getting together with
17 the hosting division to discuss the outcome of this
18 Advisory Committee and to work together on further
19 guidance development and approach to analgesic
20 development.

21 Thank you.

22 DR. FIRESTEIN: Thank you, Dr. Hertz.

23 The next item on the agenda is a
24 discussion of some of the basic science behind pain
25 and analgesia by Dr. Clifford Woolf.

1 Basic Science

2 Clifford J. Woolf, M.D., Ph.D.

3 DR WOOLF: Thank you very much for this
4 opportunity to share a basic science perspective on
5 this very important issue.

6 [Slide.

7 What I would like to try and discuss today
8 is how the advances that have occurred in the last
9 10 years, since the 1992 Guidelines, some of the
10 advances that have been made and the implications
11 for them in looking at analgesia and analgesics,
12 and this issue of labeling.

13 Some of the particular issues I would like
14 to address is whether there is a basis for the
15 differentiation of pain in terms of its chronicity,
16 intensity, and how our understanding of the
17 mechanisms that are responsible for pain can drive
18 and may actually be included in any discussion
19 about indication.

20 [Slide.

21 To begin with, to look at pain chronicity,
22 I think it is important, when we look at the
23 difference between acute and chronic pain, to try
24 and identify whether chronic pain may be the
25 results of the persistence of a mechanism or may be

1 the result of the recruitment of a novel mechanism
2 that is not present in those patients that have
3 acute pain, because these clearly are quite
4 different.

5 [Slide.

6 So, doing a kind of an analysis of those,
7 we can readily appreciate that acute pain
8 characteristically is transient, it may be
9 recurrent, but it is always reversible. That is a
10 key element implicit in our definition of acute
11 pain, whereas, chronic pain, I think we can
12 usefully divide into two very broad categories.

13 There are those patients who have
14 long-lasting pain which is reversible, so that if
15 the driving mechanism responsible for that pain is
16 removed, that pain will tend to disappear, whereas,
17 there are other patients where the pain is truly
18 persistent and we can even say irreversible.

19 I think these are very distinct
20 subcategories and we need to recognize and solve
21 that.

22 [Slide.

23 In terms of looking at pain intensity,
24 again, the issue is whether there is a continuum of
25 pain mechanisms that can generate pain of different

1 intensity divided between mild, moderate, and
2 severe, or whether each of these levels of
3 intensity of pain reflect discrete mechanisms that
4 operate, that are recruited at different levels of
5 disease or as new etiological factors come into
6 play.

7 Another important aspect we need to take
8 into account is when we look at the intensity of
9 pain that is experienced by an individual, whether
10 that reflects an increase in some stimulus, some
11 external driving force, some disease factor, or,
12 indeed, may be an alteration in the responsiveness
13 of the nervous system.

14 Certainly, there is now increasing belief
15 amongst basic scientists that the responsiveness of
16 the nervous system can alter quite profoundly, and
17 an increase in intensity may not necessarily
18 reflect an increase in stimulus.

19 [Slide.

20 The simple underlying approach to pain
21 until quite recently was that multiple etiological
22 factors operating by means of inflammation, tissue
23 damage, nerve lesions, or a number of other ways,
24 could act on a highly specialized sensory apparatus
25 in the nervous system to drive the symptoms and

1 signs that we now collectively call pain, and that
2 there was, if you like, this convergence of
3 etiological factors acting on the nervous system to
4 initiate a set of changes which generated the
5 response that we interpret as pain and that we
6 could then subdivide the pain depending on the
7 etiological factors, the duration, the associated
8 changes into different pain syndromes.

9 What I would like to argue today is that
10 we need to move away from this very simple model,
11 and I would like to show you why it is neither
12 correct nor helpful in defining the approach the
13 analgesics.

14 [Slide.

15 One of the main reasons is that it has
16 become increasingly clear that we are dealing with
17 multiple distinct pain mechanisms. This is an
18 incomplete list. Almost certainly this list is
19 going to change as our understanding of pain
20 improves, but it is clear that there is a distinct
21 mechanism that is responsible for nociception by
22 which I mean the sensory mechanism that is
23 responsible for pain in response to a transient
24 non-damaging, noxious stimulus.

25 There are distinct mechanisms that operate

1 to alter the sensitivity of the high-threshold
2 nociceptive primary afferents that are responsible
3 for nociception, and these changes at the
4 peripheral terminals of these nociceptors are what
5 we call peripheral sensitization and are a major
6 driver of inflammatory pain.

7 In addition, it is increasingly apparent
8 that changes in the processing of sensory
9 information within the central nervous system, that
10 collectively we can call central sensitization,
11 play a major role in the shaping of the pain
12 experience and may in some individuals and in some
13 situations be a major factor responsible for the
14 pain.

15 After nerve damage, we now appreciate
16 there is the development of ectopic excitability,
17 sensory inflow with a sensory stimulus. There are
18 also increasing indications that lack of inhibition
19 and structural alterations in the nervous system
20 may play a major role particularly in chronic pain
21 associated with nerve damage.

22 Today, I am going to stick my discussion
23 to the first three mechanisms and try and
24 illustrate how understanding of them has
25 implications for determining the efficacy of

1 different groups of analgesics.

2 [Slide.

3 In addition to multiple pain mechanisms,
4 we need to recognize that pain is not a monolithic
5 single entity. There are different pain symptoms
6 that may complicate a way to reflect these
7 different mechanisms, and that if we use global
8 pain scores, we may be missing some of the
9 different mechanisms that operate in different
10 conditions, so it is important for us to appreciate
11 that there is spontaneous pain, pain that
12 apparently arises without any peripherals or
13 without any stimulus, and evoked pain, pain that
14 occurs in response to some input.

15 Spontaneous pain itself may be divided
16 between that that appears to derive from the skin,
17 from the superficial structures of the body, and
18 that which is deep. Indeed, there are differences
19 between the pain that is continuous and that which
20 is intermittent, and clinically, we certainly
21 recognize that these are not the same.

22 Evoked pain, again there is enormous
23 difference between pain that is evoked by thermal
24 and mechanical stimuli, and it is important to
25 differentiate pain that occurs in response to a

1 stimulus that normally would not be painful, what
2 we call allodynia, and an exaggeration of the
3 response to a noxious stimulus, that which we call
4 hyperalgesia.

5 What I would like to argue is that each of
6 these different categories reflects different
7 activities in the nervous system and it is
8 essential in performing clinical trials to try and
9 capture as much of this information because it
10 reflects some of the processing that generates the
11 pain experience.

12 [Slide.

13 To illustrate the points that I have made,
14 I am going to look at the COX-2 selective or
15 specific inhibitors and try and identify from our
16 increased knowledge of the mechanisms that operate
17 to produce pain, how there may be elements of pain
18 that are sensitive to these classes of drugs and
19 others that are not, and for that reason, why the
20 discussion of whether it is appropriate to discuss
21 global analgesics or even analgesics that are
22 appropriate for all acute pain or all chronic pain
23 needs to take into consideration some of these
24 factors.

25 [Slide.

1 So, to begin with, to come back to
2 nociception, as I said before, this is the term
3 that we use to describe the capacity of the nervous
4 system to respond to particular intense stimuli,
5 noxious stimuli, those stimuli which have the
6 capacity to damage the body.

7 These stimuli are detected by highly
8 specialized primary sensory neurons, the nociceptor
9 neurons, which respond only to intense, and not to
10 innocuous stimuli, and they feed into particular
11 neurons within the central nervous system that
12 transfers this information to that part of the
13 cortex that eventually results in the sensation or
14 the perception of pain.

15 This, if you like, is the "ouch" pain, the
16 pain we feel in response to a pinprick or touching
17 something that is too hot or too cold, and clearly,
18 it has a major role as a protective mechanism, an
19 early warning device, and that is something we need
20 to appreciate because abolition of no nociception,
21 while appropriate in some conditions, such as
22 during surgical intervention, is not appropriate in
23 the chronic setting.

24 [Slide.

25 How does nociception generate? Well, if

1 we think back to 1992, we had almost no information
2 on how noxious stimuli act on the nervous system to
3 generate nociception, and in the last 10 years, the
4 progress has been extraordinary. Only in the last
5 few months has the receptor, the CRM1 receptor been
6 cloned that converts cold stimuli into cold pain.

7 Heat pain is detected by a number of
8 different receptors. About five years ago, the
9 vanilloid receptor 1 was identified as being a heat
10 transducer, and only in the last month has another
11 member of the vanilloid family, the TRPV3, the TRP
12 channel V3 been identified.

13 So, we now know the individual ion channel
14 receptors that respond to these noxious stimuli and
15 produce generated potentials. There are also
16 receptors that respond to chemicals released at the
17 time of tissue damage, such as bradykinin, the B1
18 and B2 receptors, and we are at the point of
19 understanding how intense mechanical stimuli are
20 transduced into electrical activity.

21 Now, the point of going through all of
22 these is that you will see there are no
23 prostaglandin receptors, there is no COX-2 here, so
24 that the process by means of which an intense
25 thermal chemical or mechanical stimulus produces

1 nociception is COX-2 insensitive. No amount of
2 COX-2 inhibitors given at anytime will affect the
3 way we respond to pinprick or heat stimulus, so
4 that COX-2 is not appropriate for that indication.

5 [Slide.

6 If we look at the transfer of information
7 from the primary sensory neuron to central
8 neurons--and this is an attempt to cartoon the
9 central terminal of nociceptors and their synaptic
10 interaction with neurons in the spinal cord--we
11 have identified the key transmitters that act to
12 transfer this information.

13 There are both excitatory amino acids,
14 such as glutamate and neuropeptides, such as
15 substance P, and they act on a number of receptors
16 on the postsynaptic neuron, both inotropic
17 receptors and metabotropic receptors, and these can
18 be modulated in different ways by a number of
19 receptors which play a role in inhibitory
20 mechanisms.

21 The GABAergic, particularly the GABA-A
22 receptors, which control presynaptic release of
23 transmitters and a number of other receptors,
24 particularly the opiate receptors, which are
25 expressed both pre- and post-synaptically, and can

1 reduce synaptic transmission.

2 So, opiate receptors and opioids, opiate
3 receptor activation and opioids can certainly
4 modify this transmission process and can reduce
5 nociception, but again, you will see that there is
6 no COX-2 or prostaglandins involved in this, and
7 once again, nociception, both peripherally and
8 centrally, is not COX-2 sensitive.

9 [Slide.

10 That is essentially the conclusion made
11 here.

12 [Slide.

13 If we talk about COX-2 as being an
14 analgesic, we need to take onboard that it is not a
15 global analgesic, it does not reduce all pain in
16 all circumstances, and it certainly will not reduce
17 nociception, which is actually a desirable
18 consequence of all chronic usage as I have
19 indicated.

20 [Slide.

21 We now move on to peripheral
22 sensitization. This is the setting now where we
23 have inflammation in the periphery. The peripheral
24 terminal of nociceptors are exposed to inflammatory
25 mediators, and this changes the peripheral terminal

1 in the way that this terminal can now be activated
2 by stimuli that have a lower intensity, so that
3 both stimuli that would normally not produce pain,
4 and noxious stimuli produce a greater response, and
5 this creates the situation where we have what is
6 called primary hyperalgesia, which is abnormal pain
7 sensitivity in the site of tissue damage, and one
8 of the particular roles that peripheral
9 sensitization has been shown to operate in is
10 primary heat allodynia, the reduction in the heat
11 threshold for producing pain.

12 Normally, we require stimulus of about 42
13 degrees for the conversion of a hot to a painful
14 stimulus, but in the presence of inflammation, this
15 can fall quite substantially.

16 What are the mechanisms involved in
17 generating peripheral sensitization? Well, they
18 are multiple, but the one that I want to highlight
19 today is that as a result of the inflammatory
20 response and the release of cytokines, particularly
21 IL-1 beta and TNF-alpha, there is the induction of
22 changes in cells surrounding the inflamed area of a
23 number of enzymes and growth factors and
24 chemokines, but the one here that I want to
25 emphasize is COX-2, but if COX-2 and phospholipase

1 are induced at the site of peripheral inflammation,
2 that results after action by specific tissue
3 isomerases and the production of prostanoids, such
4 as prostaglandin E2, which can then act on EP
5 receptors, prostaglandin receptors that are
6 expressed on the peripheral terminal of the primary
7 nociceptor.

8 Prostaglandin, when it acts on the
9 peripheral terminal, does not directly produce an
10 activation of the peripheral terminal, it does not
11 itself produce pain. What it does do is alter the
12 excitability of the peripheral terminal, and we now
13 know how that occurs. It is via activation of
14 kinases that are present in the peripheral terminal
15 that phosphorylate either transducive proteins,
16 such as the vanilloid VR1 heat transducer, reducing
17 its threshold of activation or it phosphorylates
18 ion channels that are present in the peripheral
19 terminal making the peripheral terminal
20 hyperexcitable, so that less of a stimulus or less
21 transducer action is required to activate the
22 peripheral terminal.

23 I indicate there is a northern blot on the
24 side showing that in normal skin, there is
25 undetectable COX-2 levels, but within several hours

1 of peripheral inflammation, there is an enormous
2 induction of this enzyme, and the point being that
3 this particular pain is COX-2 sensitive. You
4 cannot have COX-2 action if there is no target
5 COX-2 expressed, but after peripheral information,
6 it begins to be expressed, so this particular
7 mechanism is COX-2 sensitive.

8 There are, in addition to prostanoids,
9 other mechanisms that can drive peripheral
10 sensitization, which means that COX-2 inhibitors
11 may not completely eliminate this process.
12 Bradykinin, amines may also produce these changes,
13 this activation of kinases, which can phosphorylate
14 some of these proteins.

15 Conceivably, drugs may be developed that
16 can block these kinases and even their targets,
17 such as the vanilloid receptor or the ion channels,
18 and may actually totally abolish the changes that
19 are produced by peripheral inflammation.

20 [Slide.

21 I now want to move on to changes that can
22 occur within the central nervous system, changes in
23 the excitability of neurons which alter its
24 responsiveness, and the situation here is that we
25 now recognize that noxious stimuli produced by

1 irritants, tissue damage, inflammation, anything
2 that can activate nociceptors can result in a use
3 or activity-dependent plasticity within the central
4 nervous system, altering the excitability of these
5 central neurons, and this results in a situation
6 whereby these neurons respond to normal inputs in
7 an exaggerated or abnormal way.

8 This generates two broad changes that we
9 can recognize in pain. One is secondary
10 hyperalgesia, which is a change in sensitivity to
11 pain outside of an area of tissue damage or
12 inflammation.

13 Peripheral sensitization contributes to
14 the pain sensitivity at the site of tissue damage,
15 but central sensitization, this abnormal
16 responsiveness of central neurons, contributes to
17 the change in sensitivity that spreads into normal
18 non-damaged or non-inflamed tissue outside the area
19 of tissue damage.

20 One particular mechanism that we now
21 recognize as being driven by central sensitization
22 is tactile or brush-evoked allodynia. This is the
23 pain that can occur by the activation of normal
24 low-threshold mechanoreceptors that would be
25 activated by lightly touching or brushing the skin.

1 After the induction of central sensitization, such
2 stimuli can begin to produce pain, and this is a
3 reflection of this mechanism.

4 [Slide.

5 The reason why central sensitization
6 produces changes in pain is it turns out that the
7 pain projection neurons within the nervous system
8 do not exclusively receive input from nociceptors,
9 the high-threshold sensory fibers.

10 They receive, in addition, an input with
11 weak synaptic input from low-threshold
12 mechanoreceptors. This synaptic is normally too
13 weak to drive the cells, so that activity generated
14 by light touch, movement of a joint will not
15 normally generate an output in the pain projection
16 neurons, but if the excitability of the central
17 neurons is increased, then, this normal input in
18 normal, low-threshold mechanoreceptors can begin to
19 drive these abnormally excitable central pain
20 projection neurons and result in the recruitment of
21 pain in response to this normal input.

22 This is the mechanism for brush-evoked
23 mechanical allodynia.

24 [Slide.

25 What actually produces the increase in

1 excitability of the central neurons and the
2 specific details are not important for the purposes
3 of this discussion, but just to say that it turns
4 out there are two phases to the production of
5 central sensitization.

6 There is an acute phase that occurs within
7 seconds of the activity of nociceptors. If you
8 activate nociceptors intensely, and this can be
9 done by an irritant stimulus or heating the skin or
10 tissue damage, that will result in the release of
11 glutamate and beyond it, if there is enough
12 glutamate released as a result of repetitive
13 activity in nociceptors, that will induce
14 activation of intracellular kinases, cyclic
15 AMP-dependent protein kinase A, and
16 calcium-sensitive protein kinase C, which will
17 phosphorylate the receptors and ion channels on the
18 postsynaptic membrane, altering their
19 responsiveness.

20 So, there is an activity-dependent change
21 in the excitability of the postsynaptic membrane
22 due to the synaptic release. Again, you can see
23 that while there are multiple players invoked in
24 here, COX-2 is not a feature. So, this component of
25 central sensitization, the acute component that is

1 switched on almost immediately by intense
2 nociceptor activity is not COX-2 sensitive.

3 [Slide.

4 However, it turns out that peripheral
5 inflammation, in addition to inducing COX-2 in the
6 site of tissue damage, as I have indicated, also
7 induces COX-2 within the central nervous system, in
8 the spinal cord, and this occurs after several
9 hours.

10 The question is does this have any role in
11 central sensitization.

12 [Slide.

13 Well, there are two things to first
14 recognize, is that the central induction of COX-2
15 occurs only in response to peripheral inflammation,
16 and not in response to peripheral nerve damage, so
17 again, we need to differentiate when we are looking
18 at this mechanism the way it operates after tissue
19 damage and inflammation is quite distinct from what
20 happens after peripheral nerve injury.

21 It turns out that the late phase of
22 central sensitization, that phase that occurs hours
23 and days after tissue damage does involve COX-2,
24 because COX-2 begins to be induced in neurons
25 within the central nervous system, produces

1 prostaglandins which have multiple actions,
2 increasing transmitter release, increasing the
3 excitability of postsynaptic receptors, as well as
4 blocking some inhibitory actions.

5 The net result is that the increase in
6 excitability of central neurons acutely is not
7 COX-2 sensitive, but that which occurs some hours
8 after tissue damage begins to have a component that
9 is COX-2 sensitive.

10 [Slide.

11 So, the conclusions I would like to make
12 from this is that there are COX-2 sensitive
13 peripheral and central components of inflammatory
14 pain, but not necessarily of the pain associated
15 with peripheral nerve injury, that COX-2
16 inhibitors, as an example, can only act when their
17 target is expressed. It needs to be induced. This
18 takes a finite amount of time.

19 The cytokines IL-1 needs to produce, it
20 needs to act on cells, which then switch on
21 transcription factors, such NF kappa B, which then
22 switch on the COX-2 gene, the messenger RNA has to
23 be made, translated into protein, and this needs to
24 be transported to the appropriate place in the
25 cell.

1 This takes several hours, so that after
2 peripheral inflammation, you only get a COX-2
3 sensitive component when the COX-2 is expressed and
4 there.

5 There are also non-prostanoid contributors
6 to inflammatory pain, and this may explain why
7 COX-2 selective or sensitive inhibitors cannot
8 produce a complete relief of pain. Other
9 mechanisms continue to operate. So, that may
10 contribute to the ceiling effect of these class of
11 drugs.

12 I have already mentioned that peripheral
13 nerve injury may not be present.

14 [Slide.

15 So, I think we need to consider then what
16 are the models that are appropriate for looking at
17 the relationship between etiology and the symptom
18 that we call pain.

19 Well, one possibility may be that
20 different etiologies may act on the nervous system
21 to produce different distinct mechanisms that may
22 produce particular symptoms. If you need to treat
23 the particular kind of pain associated with a
24 particular etiology, you can target the individual
25 mechanism.

1 Unfortunately, the reality as far as we
2 can judge is more like this, that a single
3 etiological factor can operate on the nervous
4 system to operate multiple mechanisms. Peripheral
5 sensitization and central sensitization are not
6 independent, both can be switched on by peripheral
7 inflammation.

8 Peripheral nerve injury can produce both
9 ectopic excitability and central sensitization, and
10 part of the challenge that we have is to try and
11 identify the links between different etiological
12 factors and the mechanisms they operate, as well as
13 how the different mechanisms can change, produce
14 the symptoms that the patient complains of.

15 [Slide.

16 What I would like to try and suggest is
17 that we need to differentiate between analgesic
18 drugs, drugs where the implication is a global
19 relief of pain, and drugs where there is a
20 reduction of the abnormal sensitivity of the
21 nervous system, and that this is a useful
22 distinction.

23 I hope I have indicated to you that both
24 the temporal and intensity characteristics of pain
25 do not, by themselves, reflect mechanisms, that

1 they are different mechanisms that can operate to
2 produce both acute and chronic pain, and that for
3 this reason they may not, by themselves, be useful
4 predictors of analgesic action.

5 I would like to argue that as we begin to
6 understand more about pain mechanisms and the very
7 particular mechanisms that individual drugs have,
8 that it is this combination that is going to
9 provide the most useful input for determining
10 indication and efficacy.

11 [Slide.

12 In order to make progress, we need to move
13 away from using exclusively global pain scores as
14 our outcome measures. We need outcome measures
15 that are sensitive or specific to particular
16 mechanisms, and that is a big challenge.

17 We need clinical trials that can validate
18 mechanistic hypotheses and that are designed
19 specifically to address the issue of which drugs
20 acting on which mechanisms can alter the symptoms
21 in particular groups of patients.

22 We need to consider labeling claims and
23 the like to the action of drugs, with the
24 interaction of the drugs with specific pain
25 mechanisms, as well as the more traditional

1 approach, which has been empirical trials looking
2 for efficacy.

3 My final conclusion is that I think--and
4 this overlaps to some extent with the comments made
5 by Jim Witter--are there going to be global
6 analgesics. I think this is unlikely.

7 Pain has too many different mechanisms
8 operating that it is very unlikely that a single
9 drug is going to affect all of them and that the
10 challenge we have is to try and optimize the way to
11 detect which particular mechanisms an individual
12 drug is operating to see the utility of blocking
13 that mechanism for particular groups of trials and
14 let that drive the labeling of the drugs.

15 Thank you.

16 DR. FIRESTEIN: Thank you very much for an
17 excellent discussion.

18 Discussion Points #1 and 2

19 DR. FIRESTEIN: At this point, we can move
20 into some of the discussion issues that were raised
21 by Dr. Simon and the Agency. I believe that we
22 were going to discuss Points No. 1 and 2. I will
23 just read the first one and then open it to the
24 group for comment.

25 1. A revised analgesic guidance may

1 include indications intended to inform labels for
2 the management of acute versus chronic pain, rather
3 than a general pain claim. Please comment on the
4 clinical relevance of this distinction in terms of
5 efficacy and safety.

6 if there is anybody who would like to get
7 the ball rolling here? I suppose that then becomes
8 the Chair's prerogative to comment and then have
9 everybody disagree with me.

10 I think that the discussion that we have
11 already had, defining the distinct mechanisms of
12 pain, raised some of the issues about separate
13 labels for acute versus chronic pain as opposed to
14 a general pain claim versus a specific claim that
15 is mechanism based.

16 I think in particular, one of the things
17 that was discussed earlier was the question of
18 whether chronic pain in some cases merely
19 represents persistence of acute pain mechanisms,
20 and how can one distinguish that in a chronic pain
21 labeling is going to be quite difficult.

22 I don't know, Dr. Woolf, you might want to
23 comment on that particular aspect.

24 DR. WOOLF: The point I was trying to make
25 using the COX-2 inhibitors would be, to get down to

1 specifics, that although they may have an
2 indication for chronic pain based on a number of
3 replicate trials showing efficacy in chronic pain,
4 the evidence indicating that there is no COX-2
5 induction of peripheral nerve injury, which may
6 certainly produce chronic pain, would indicate that
7 most patients with neuropathic pain may not respond
8 to COX-2 inhibitors, so that an indication of
9 chronic pain by itself is incomplete and may lead
10 to inappropriate use of analgesics, which may not
11 have efficacy in certain particular groups of
12 patients.

13 So, the issue then is does chronic pain,
14 by itself, have a meaning. I think we have just
15 got to be a little cautious of that.

16 DR. FIRESTEIN: I guess on the other hand,
17 it might at least bring us a little closer to
18 reality as opposed to a more global pain
19 indication, in other words, although there are
20 clearly limitations between acute versus chronic
21 pain, that is less problematic than trying to have
22 a global pain indication that would cover all
23 aspects of all pain indications.

24 DR. MAX: Gary, you have already in your
25 question, you already indicated that this

1 distinction is mechanistically insufficient,
2 because you said chronic back pain can have acute
3 inflammation on top of it. I think it is clear
4 from Clifford's talk that this does not do very
5 much for us with mechanisms.

6 However, just from a practical clinical
7 setting point of view, I think it is clear that
8 when we talk about acute pain, we are talking about
9 a specific clinical orientation of the patient.
10 They have sudden bad pain and they are willing to
11 do anything they can for a few days to handle it,
12 and a little bit of impairment of work might be
13 okay.

14 On the other hand, in chronic pain, we
15 really need evidence from day-in, day-out living,
16 not just the single dose trial, that the patient
17 has got to be able to live with the analgesic
18 regimen and the way of evaluating it is going to be
19 much different.

20 So, I think the main argument for this
21 division being important is the practical
22 considerations, the clinical setting, are so much
23 different that they really imply completely
24 different clinical trial designs.

25 I mean once we take each, then, we can

1 bring in some of the mechanistic considerations
2 that will be hard.

3 DR. FIRESTEIN: Dr. Brandt, did you have a
4 comment?

5 DR. BRANDT: Yes. I think, Dr. Woolf,
6 that was really a beautifully lucid and useful
7 dissection of mechanisms. To bring it to
8 osteoarthritis pain, I would like to ask whether it
9 suggests a research approach.

10 Nonsteroidals for patients with
11 osteoarthritis improve pain on average, on visual
12 analog scales, 20, 25 percent. Some patients get
13 terrific relief, some patients get worse, but on
14 average, 20, 25 percent.

15 If you add acetaminophen to a
16 nonsteroidal, you get a further increment, but
17 there still is a significant amount of residual
18 pain. Based on what you said, presumably, there is
19 another mechanism that is driving it, how does one
20 get at that, how does one study that to know what
21 sort of drug might be useful or might be reasonably
22 tested to get at that residual pain.

23 DR. WOOLF: Chronic osteoarthritis is a
24 very interesting disease from a basic science point
25 of view. The problem we have is that there are

1 very poor preclinical models that it is very
2 difficult to test in the preclinical setting what
3 the mechanisms are.

4 The fact that there is a response, even
5 though modest, to standard NSAIDs when in most
6 patients there is not ongoing inflammation, raises
7 the issue of where is the COX-2 that presumably
8 they are acting on, so I think the first research
9 question is, is this a disease of the periphery in
10 terms of COX-2 mechanisms or is the COX-2 induced
11 in the central nervous system.

12 The fact that there is an additional
13 contribution of acetaminophen would imply that that
14 is likely to be the case.

15 The ceiling effect of NSAIDs is as you
16 indicate, and the fact now with the
17 second-generation COX-2's, where the doses can be
18 pushed to a level where all conceivable COX-2 is
19 likely to be inhibited certainly indicates that
20 there is a residual mechanism that is not COX-2
21 sensitive.

22 What it is, is obviously the big
23 challenge, and I could speculate, but I think this
24 is where new drugs with new targets are coming onto
25 the market. Some of them may be useful by

1 themselves, but I think in clinical practice, we
2 know already that polypharmacy is a standard way in
3 which patients are treated.

4 So, it is very likely that these new
5 drugs, acting on different independent targets,
6 will have a role, sometimes by themselves, but
7 often in combination with existing therapy.

8 DR. FARRAR: Understanding that even in
9 the realm of arthritis, it is very often difficult
10 to identify in any given patient the primary cause
11 for their discomfort, I wanted to ask Dr. Woolf
12 whether, if we were able to identify a subset of
13 arthritic patients who had, in fact, a very similar
14 peripheral mechanism, whether that nice
15 pathophysiology slide you showed with all the
16 various mechanisms, whether all of those mechanisms
17 would apply in every patient or whether, in fact,
18 there would be within even a mechanistic approach,
19 differences in the way that a particular patient
20 responds to both the pain and the underlying
21 treatment based on the fact that some may have a
22 predominance of one kind of receptor over another
23 or a predominance of one response over another.

24 DR. WOOLF: I think it is even more
25 complicated than that. I think it is not only the

1 problem that individual patients within a
2 particular group or clinical entity, a particular
3 form of arthritis may have different mechanisms,
4 but an individual patient over the evolution of
5 their disease will almost certainly have different
6 levels of contributions of the different
7 mechanisms.

8 The challenge is how to identify them, and
9 the fact, the comment that was made that some
10 patients may respond extremely well to NSAIDs than
11 others, I think that gives part of the clue. I
12 think one of the tools that we are going to have to
13 use are drugs to try and identify mechanisms.

14 Those patients who respond very well to
15 COX-2 inhibitors, by definition, we are defining at
16 least one component of their pain is COX-2
17 sensitive, whereas, those patients that don't,
18 assuming the drug, the notions of bioavailability
19 or PK, we can conclude that in those individual
20 patients, there is not a COX-2 component.

21 So, I think we are going to have to use a
22 combination of trying to link up symptoms with
23 mechanisms, which is difficult, but not impossible,
24 as well as the responsiveness of the patient to
25 very specific forms of therapy.

1 DR. SHERRER: A question as it relates to
2 chronic pain, because it was mentioned earlier by
3 Dr. Witter, and it is certainly true clinically,
4 that there are two types of chronic pain. There is
5 the chronic persistent pain, and there is the
6 chronic acute intermittent pain or intermittent
7 pain at least.

8 Do those patients represent people with
9 repetitive acute pain mechanisms even though it is
10 one disease, such as the osteoarthritis patient who
11 flares every few weeks or with a weather change or
12 with activity, or, in fact, is that a different
13 mechanism of chronic pain?

14 DR. WOOLF: I gave an example just to try
15 and differentiate in the most global sense, but
16 there will again be patients, such as those with
17 trigeminal neuralgia, who will also have
18 intermittent pain where the mechanism will be
19 completely different from an OA patient with flare,
20 so I hope I didn't give the impression that that
21 represents two distinct mechanisms.

22 There may be again multiple mechanisms
23 that operate between those two classes, but I think
24 we are all aware of patients who have OA of the
25 hip, when the hip is replaced, can do extremely

1 well with minimal recurrence of pain, where there
2 are patients with peripheral neuropathic pain where
3 the neuroma is removed, and they have a transient
4 response and the pain comes back, so the point
5 being that in some cases, removing the etiology,
6 the cause, the hip, can actually remove the pain,
7 whereas, in other patients, it appears as if the
8 mechanisms have now been hard wired, if you like,
9 and are resistant to, are no longer driven by the
10 initial disease process.

11 DR. FIRESTEIN: Let's come back to one of
12 the issues raised here, and that is whether or not
13 there is utility to differentiating between acute
14 versus chronic pain as compared with a general pain
15 claim and, in particular, issues that relate not
16 only to efficacy but safety.

17 One example of that would be for the
18 selective COX-2 inhibitors where one dose might be
19 approved for the treatment of acute pain and has
20 had either a dosage creep that has then at least in
21 the clinic led to use of some of these higher doses
22 for chronic treatment, and some of the safety
23 issues may not have been addressed in the clinical
24 trials because of that.

25 Does anybody have a comment? Yes.

1 DR. ELASHOFF: What I wanted to ask is in
2 the first day or so of pain, if you are labeling
3 things for acute or for chronic, does one know in
4 the beginning whether you ought to be using the
5 ones labeled for acute, because you don't know
6 whether it might turn out to be chronic or not, or
7 might you have the knowledge to say you ought to be
8 starting in with chronic, so would one always start
9 with acute things and then switch, or does one
10 potentially have the knowledge at the beginning
11 that you might start out with chronic things.

12 So, it seems to me that the issue of the
13 labeling has to also say, well, practically
14 speaking, how would you know in any given situation
15 which ones you are going to be using.

16 DR. FARRAR: I think we need to very
17 carefully differentiate between how we use the
18 medicine and what we are treating. The question
19 you are asking really relates to whether the
20 medicine is used over a long period of time or
21 whether it is used over a short period of time.

22 I think the issue is not answerable from
23 an acute or chronic perspective. If you take
24 migraine headache, there are medicines that are
25 used to prevent it, that are used regularly over a

1 long period of time, and then there are medicines
2 that are used to treat it, which may be used over a
3 very short period of time.

4 I think we need to differentiate between
5 whether it is used over a long or short period,
6 which can be done in a label, to say this drug can
7 only be used for, it has only been shown to be safe
8 for six weeks versus saying whether you are
9 treating acute or chronic pain. I think those two
10 are very different.

11 DR. CUSH: But aren't you just saying the
12 same thing? I mean it is acute, a short period,
13 and chronic if it's long term. We know that based
14 on what the etiology of the pain is, the problem,
15 whether it's postsurgical or dysmenorrhea or
16 migraine, what our goals are as far as short term
17 or long term.

18 But the terms of acute therapy and chronic
19 therapy are useful. They dictate how we use these
20 drugs. They dictate our expectations for these
21 drugs. To go with a more general pain claim is too
22 vague and not applicable to many patients that we
23 use.

24 DR. FARRAR: But don't confuse acute
25 treatment and chronic treatment with acute pain and

1 chronic pain. As was said here, you don't know
2 when you start necessarily whether it is going to
3 be a 2-day treatment or a 10-day treatment.

4 DR. CUSH: I think most physicians do know
5 when they start out with managing pain what the
6 goals are for pain management. Now, it is not to
7 say that patients who start out with a migraine
8 don't have a migraine that might be extending out
9 beyond a few days, and acute therapies may not
10 work, but I think that there are goals when you
11 make a diagnosis and see a patient as far as
12 whether it is going to be short-term therapy or
13 long-term therapy.

14 DR. WOOD: I also found the last talk very
15 interesting, but it seems to me the question that
16 we need to debate is where the science is with this
17 and whether the science is mature enough to
18 actually make decisions on this.

19 I mean I would characterize this as being
20 a bit like, say, leukemia. Leukemia is
21 characterized by an increased white count, and
22 clearly the management of leukemia depends on
23 knowing a lot more than just that the number of
24 white blood cells is increased.

25 You need to know the etiology, you need to

1 know the subset of patients, the subset this
2 patient belongs to in order to define an
3 appropriate therapy.

4 So, my question I think is the following -
5 is the science mature enough or likely to become
6 mature enough in the foreseeable future to divide
7 patients into subsets based on the kind of
8 divisions that Dr. Woolf described, and are we or
9 will we be at a stage in the near future when we
10 could make treatment decisions based on such
11 subdivisions, or alternatively, is this solely at a
12 stage where this should guide or direct drug
13 development, and are you proposing this, not as a
14 treatment decision paradigm, but one that would
15 allow us to identify potential new targets for drug
16 development, which--and this is important for this
17 discussion--which we would then need to define in
18 some way, a way in which we would approve the drug,
19 because it is improbable that the approval will be
20 based on some surrogate for the subsets you are
21 talking about.

22 Does that make sense?

23 DR. WOOLF: Yes, I think so. The
24 situation we are at currently has been based on the
25 experience with both NSAIDs and opiates, and we now

1 have a sense of which patients are likely to
2 respond, the kinds of outcome measures that are
3 sensitive to that.

4 My concern is that the basic science is
5 now revealing new targets which industry are
6 developing new molecules, and the current models
7 that the 1992 Guidelines reflect are not
8 appropriate for that, that if we use these models,
9 there may be heterogeneity of mechanisms in the
10 patient groups that we study that will dilute the
11 outcome measures to a point where it may look as if
12 there is no efficacy globally, whereas, in fact, in
13 the subgroups that do have the particular
14 mechanisms, you would get very high efficacy, and
15 that was a point that was raised by Dr. Fang
16 earlier, that the responder rate may reflect the
17 different incidences of mechanisms.

18 We are at a transition point where it is
19 difficult to predict exactly how useful clinically
20 the identification of mechanisms is likely to be,
21 but I think equally, there is now enough evidence
22 from the COX-2's where we are defining exactly how
23 they produce the effects and efficacy to recognize
24 that we can divide patients into COX-2 sensitive
25 and COX-2 insensitive groups.

1 With that knowledge, we can identify some
2 of the best ways to identify efficacy, as well as
3 clinical utility.

4 DR. WOOD: But presumably, the COX-2
5 insensitive group includes all of the above, I mean
6 everything that is not prostanoids mediated, so the
7 heterogeneity in that group is probably at least as
8 large as the heterogeneity in the total group. It
9 is just lacking the prostanoids insensitive group.

10 So, how would you guide either therapeutic
11 decisions on the basis of that, or alternatively,
12 and more importantly I guess for this group, how
13 would you guide the definition of patients to
14 include in the trial that would demonstrate such
15 efficacy, that is not just an exclusion?

16 DR. WOOD: Well, in terms of COX-2's, for
17 example, that if the COX-2's have a label for acute
18 pain, I think that would be too generous in the
19 sense that procedural pain, pain associated with
20 minor acute procedures that would generate
21 nociceptor pain, would not be sensitive to COX-2's,
22 and therefore, that would be an inappropriate
23 usage.

24 Equally, there is minimal clinical data
25 available, but if there were, I think it is likely

1 that postherpetic neuralgia and diabetic neuropathy
2 are going to turn out not to be COX-2 sensitive, so
3 that a chronic pain indication, a global chronic
4 pain indication for COX-2's again would be
5 inappropriate.

6 There would be some patients where that
7 would not be likely to produce efficacy. The
8 problem is there is still heterogeneity in the
9 other groups, I accept that, and that is what makes
10 it very difficult.

11 DR. FIRESTEIN: Dr. Ashburn, any comment?

12 DR. ASHBURN: One thing I wanted to point
13 out is that we have been talking about several
14 different definitions of acute versus chronic.

15 Dr. Hertz talked about that the 1992
16 advisory on analgesic drug approval discussed the
17 concept of acute pain as being pain that existed
18 very early on, had a fairly sudden onset and a
19 short duration of action, and chronic pain was pain
20 that had persisted for six weeks in a cancer
21 patient, although I have cancer patients who would
22 say that if it persists for two day, it is chronic,
23 and chronic pain, for people who are not dying of
24 cancer, has to last six months before it meets the
25 definition.

1 Dr. Woolf gave what I believe is a more
2 appropriate definition regarding the expected
3 impact on the body and the expected reversibility
4 of the pain.

5 On the other hand, some of the other
6 speakers have really alluded to something which may
7 be more important with regard to drug review, and
8 that is, the duration of therapy, which is much
9 more different, if the expected therapy is of short
10 duration rather for long-term, chronic delivery.

11 I want to just point out that one issue
12 has to do with regard to safety and durability of
13 effect, which I think are very important factors
14 that need to be investigated when a medication is
15 being looked at for outcome. The other one has to
16 do with defining different disease states with
17 which to do studies. That had to do with appropriate
18 labeling with regard to dosing interval.

19 DR. FIRESTEIN: That actually begins to
20 bring us towards the second question. We have a
21 couple of other comments that people wanted to
22 make, and then we will move on. But I think most
23 people here seem to be in agreement that a general
24 pain claim is rather vague and it is going to be
25 difficult to approach from a mechanistic or even a

1 clinical perspective.

2 I think one of the things that we might
3 want to consider, after hearing the elegant
4 discussion on pain mechanisms, is in addition to
5 acute and chronic, whether or not there might be a
6 place for a third category, such as acute
7 persistent, where patients that have acute
8 mechanisms of pain, that are persistent and
9 reversible, but need to take the medication for a
10 prolonged period of time, might have even different
11 criteria than other chronic indications.

12 Dr. Cush was next, then, we will get a
13 couple of other comments, and then we will move on.

14 DR. CUSH: My comment is to Dr. Woolf. I
15 think that many of us would like to see pain
16 defined mechanistically in an effort to better
17 control pain, maybe use complementary regimens to
18 get more total control, if that were possible, a
19 disease, such as osteoarthritis, but at this point,
20 would you not say that we can maybe define
21 mechanistically how certain drugs may work, and
22 that might well go into some of the preclinical
23 work that would go into maybe how a drug is defined
24 as far as its mechanism of action, but we do not
25 yet have the tools to define mechanistically how

1 these drugs work in clinical trial meaning that we
2 don't have the tools for different diseases to say
3 that this going to be a peripheral sensitizing drug
4 or central, and whatnot.

5 DR. WOOLF: If we conduct clinical trials
6 the way they have been at the moment, then, the
7 answer is yes, because global pain scores are not
8 going to identify mechanisms.

9 The big issue there is if we can gather
10 more information, for example, I indicated the
11 peripheral sensitization had a particular property,
12 which is abnormal heat sensitivity in the site of
13 inflammation, whereas, central sensitization was
14 associated with tactile allodynia.

15 Now, if that inflammation were collected
16 as part of secondary outcome measures, maybe we
17 could get an indication whether new forms of
18 therapy acted on those particular mechanisms in
19 addition to whatever global effect they had on pain
20 scores.

21 So, I think we need to move from seeing
22 pain as this monolithic entity with a single
23 expression, which is what the patient feels, to try
24 and collect more data, in the same way that if we
25 look at heart failure, we would make a number of

1 measurements - peripheral edema, hypertension,
2 cardiac output, and treat those specifically.

3 I think we need to do the same with pain.
4 The trouble is we are not exactly sure of the
5 durability of these different components and their
6 reflection to mechanisms, but I would argue global
7 pain scores, by themselves, are too insensitive to
8 pick up these individual mechanisms, and therefore,
9 some drugs with some utility may be lost.

10 DR. FIRESTEIN: Two other quick comments.
11 Dr. Davidoff, did you have a comment to make, and
12 then Dr. Abramson, and then we will move to the
13 second issue.

14 DR. DAVIDOFF: Yes, I would also like to
15 add my appreciation for the discussion, which I
16 think was very lucid. But in thinking about that
17 and some of the other comments, it occurs to me
18 that there might be another spectrum in which to
19 make useful distinctions, perhaps even in terms of
20 labeling.

21 That is, there appear to be certain
22 clinical situations which are analogous to some of
23 the, as you put it, preclinical models where the
24 mechanism is relatively pure, and the models are
25 chosen to be able to study a particular type of

1 pain.

2 There are others, mostly clinical
3 situations, where it seems pretty obvious that the
4 mechanisms are mixed, and the difficulty is trying
5 to sort them out on some clinical basis whether it
6 is from subtle clinical cues, maybe the development
7 of testing that would allow you to identify the
8 mechanism, or the therapeutic trial.

9 The power of a therapeutic trial, as
10 Alastair has suggested, may actually reemerge as
11 something very powerful, just the way the treatment
12 of hypertension has evolved, so that it is not
13 clear.

14 There are certain relatively pure forms of
15 hypertension, like a pheo or primary aldosteronism,
16 where the treatment is highly specific and narrowly
17 defined, whereas, with most hypertension, it is
18 much more difficult, and, in fact, patients are put
19 on one drug and then a second drug, and a third
20 drug, and nowadays, frequently four drugs, and the
21 therapeutic response is really the way the
22 diagnosis is made, if you were smart enough to know
23 what each of those drugs was doing.

24 So, I wonder if it might be useful to add
25 sort of a dimension of purity versus--how should I

1 say--pure versus mixed mechanisms as being one way
2 to consider approaching the labeling.

3 DR. FIRESTEIN: Dr. Abramson.

4 DR. ABRAMSON: I think I had a related
5 comment because it seems that the issue is less
6 whether we should have an acute versus a chronic
7 label, which I think we should because of the
8 different clinical syndromes, but the issue is the
9 heterogeneity of what we are going to be calling
10 indications for clinical pain, and having to
11 grapple with, it that too broad a concept.

12 I mean you are describing different pain
13 mechanisms, and whether we will have a broad-based
14 label is something I think is going to be difficult
15 to grapple with.

16 I am a little concerned in that context,
17 therefore, that to try and dichotomize mechanisms
18 may be premature, in other words, many of these
19 syndromes have to be mixed, as was just said, and
20 some of the science is early and some of the
21 observations don't take into account perhaps the
22 kinetic changes over time.

23 So, I guess the question again for Dr.
24 Woolf is how advanced are the preclinical models in
25 terms of the expression of the different molecules

1 in the central and peripheral system and how might
2 we think about, when we do clinical trials in
3 chronic pain, differentiating these different
4 mechanisms based on tissue expression of some of
5 these molecules.

6 DR. WOOLF: I think your point is well
7 made. We are certainly at a point where I think it
8 is appropriate to discuss it and to try and build
9 in our view of the way in which pain is generated
10 to take into account mechanisms, but this is early.

11 This is a point where the kinetics I agree
12 are poorly defined particularly in patients.
13 Unfortunately, many of the changes, the expression
14 of different molecules occur within the nervous
15 system, so access in patients to tissue to actually
16 determine them is extremely difficult.

17 The reliability of animal models for
18 clinical diseases is a separate issue, which is
19 obviously complicated, but I think we just need to
20 try and include this as part of our operating
21 definition of what pain is, and not just ignore the
22 mechanism, particularly since we are at a point
23 where we are about to get new forms of analgesics
24 that have actions that are different NSAIDs and
25 opiates, and as a consequence, may need different

1 outcome measures reflecting the action of a
2 particular mechanism.

3 So, we are not there yet, but I think we
4 are a point where, as new trials have been
5 designed, we may need new approaches to them.

6 DR. FIRESTEIN: Actually, we have been
7 migrating slowly towards Discussion Point 2, which
8 specifically asks about mechanistic approaches
9 versus clinical approaches, and maybe we can steer
10 for the final five or 10 minutes of the session,
11 the conversation towards the utility of those two
12 approaches, whether scientifically we are at the
13 point where we should be focusing strictly on
14 mechanistic targets or whether or not the gold
15 standard will be the patient's clinical syndrome.

16 DR. MAX: Let me follow up on Dr. Wood's
17 question on where are we with the science of
18 clinical analgesia. I think it is pretty primitive
19 compared to the animal models because pain is a new
20 enough field, with so few clinical investigators,
21 mostly doing single center trials, that we haven't
22 had the size of the clinical trials combined with
23 the rigor to answer these questions.

24 I think we agree that we are mammals, and
25 if Clifford can demonstrate all these different

1 mechanisms in rats, we can in people, and there are
2 a number of examples in the laboratory with humans
3 where we can do, say, a selective nerve block and
4 knock out one kind of pain.

5 We expect that if we looked hard enough
6 with the right tools and the large cohorts in many
7 industry trials, we might find some interesting
8 correlations to learn how to use the drugs better.

9 That is why better tools, if we could
10 develop the equivalent of the arthritis trial
11 groups' scales, we might find things, and I think
12 Clifford's group is working on this, but we are
13 quite primitive, like we have just done a trial
14 with Hopkins looking at a crossover trial of
15 placebo tricyclics and opioids in postherpetic
16 neuralgia in 70 patients, and we find that one
17 group responds to opioids, and an independent group
18 responds to tricyclics, but to really prove that,
19 you would need to replicate, you would need to give
20 the patient back the same drug.

21 We haven't separated that from the
22 possibility of random variation. So, I think the
23 problem for this committee is to provide enough of
24 an incentive for industry trials to try to look for
25 mechanistically based advantages.

1 I don't think we can count on that coming
2 out, but I think if we look a little harder, they
3 are going to emerge.

4 DR. FIRESTEIN: Ken.

5 DR. BRANDT: I don't think that Question 2
6 is necessarily an either/or proposition. Coming to
7 responsibilities of safety and efficacy and looking
8 at drugs, if we come back to a way guidelines for
9 management of OA both by the ACR and by ULAR,
10 basically recommends starting with acetaminophen,
11 and if that doesn't work, moving on basically on
12 NSAIDs, and so on.

13 It occurs to me in thinking about Dr.
14 Woolf's comments, we don't know how patients who
15 fail acetaminophen respond to an NSAID. We assume
16 that they are NSAID responsive and they will do
17 better. We don't know that, and it might be useful
18 in terms of this dissection, admittedly at a very
19 crude level and admittedly with the caveat we don't
20 have a clue how acetaminophen works, to get that
21 sort of information in and see whether
22 acetaminophen failures, how frequently they respond
23 to NSAIDs and to agents that perform differently
24 than COX-2 inhibition.

25 I think there is a place to start in this,

1 taking a disease that is understood to some extent.

2 DR. FIRESTEIN: But is it more useful to
3 have a musculoskeletal approach or a mechanistic
4 approach for these drugs, for instance, do we need
5 to have separate rheumatoid arthritis and
6 osteoarthritis indications?

7 In spite of what has been said, there
8 actually is a fairly prominent inflammatory
9 component, for instance, do we want inflammatory
10 pain versus non-inflammatory pain, for instance, in
11 musculoskeletal diseases.

12 DR. BRANDT: Well, I think the issue is
13 that there are a number of origins of pain beyond
14 inflammation. There is not any disagreement that
15 OA has an inflammatory component, but, for example,
16 I think that bone pain may be significant in
17 osteoarthritis because of the alterations in bone
18 hemodynamics.

19 That might evoke interest in a whole
20 different class of drugs that would be relevant to
21 OA pain, vaso-active types of medications, that it
22 provides an opportunity by considering the
23 pathophysiology of the disease, and I think you
24 would agree there are differences between RA and OA
25 in a broad sense, not just with regard to pain or

1 inflammation.

2 That might provide opportunities to
3 explore different approaches to developing disease,
4 perhaps specific analgesics.

5 DR. KATONA: My question is for Dr. Woolf.
6 Do you have any idea on the developmental aspects
7 of the different pain mechanisms? Just working
8 along with children and adults, it is very obvious
9 that in any inflammatory disease children, who have
10 somewhat less pain, it is easier to be controlled,
11 as well as acute situations don't get chronic as
12 often as adults.

13 I am just wondering if you have ever
14 looked at or whether you have any data on it.

15 DR. WOOLF: There certainly is a major
16 interest in the developmental aspects of pain, and
17 this is an area that I, myself, do not work on, but
18 it appears as if the very early interventions in
19 neonates may have consequences, long-term
20 consequences that are quite different from a
21 similar intervention in children and adults. That
22 is one aspect that needs to be looked at, and then
23 the separate aspect of the responsiveness of
24 children themselves.

25 That raises the whole issue of what are

1 the mechanisms that operate or are responsible for
2 the conversion of acute pain to chronic pain. We
3 have heard discussion earlier of when you are
4 giving an analgesic acutely, you may not know
5 whether the patient is going to require that for a
6 long time.

7 Our knowledge of why some patients go on
8 to develop chronic pain, and others do not, is
9 quite poor, and the difference between children and
10 adults in that is certainly an important issue.

11 DR. FARRAR: I think the discussion point
12 asks the question of whether a mechanistic approach
13 or a clinical approach has a rationale, and I think
14 that what we are hearing from Dr. Woolf and Dr.
15 Brandt, and others, is that both of them are
16 clearly applicable to the appropriate use of any
17 medication.

18 It seems to me, though, that the point
19 before the FDA is that we are not yet at the point
20 to be able to mechanistically identify each and
21 every patient that comes to see us. We are also,
22 frankly, not even able to clinically identify at
23 the beginning, the underlying clinical reason for a
24 patient's disease process the first time they come
25 to see us.

1 Understanding that the nature of the
2 science of medicine is still very nascent, it is
3 still very much at the beginning, that it is
4 appropriate to consider the way in which a drug is
5 labeled, to consider the way in which patients
6 present and the way in which physicians will then
7 treat them.

8 I am a neurologist. I would love to know
9 what the underlying mechanism is of half the
10 patients that I see who come to me for pain. In
11 fact, I can't do that, even in patients with the
12 same disease process, we cannot identify,
13 necessarily identify their response.

14 In thinking about how a drug company
15 therefore must perform tests to look and see
16 whether the drug is working, I think it needs to
17 focus on the way in which patients present, so that
18 if we can develop a mechanism, Dr. Max was
19 suggesting, a mechanism to be able to actually
20 identify certain subgroups, then, it makes sense to
21 perform trials in those particular subgroups.

22 Until that science catches up, we are left
23 with treating patients with osteoarthritis.
24 Treating patients with osteoarthritis means testing
25 in osteoarthritis and understanding that the

1 underlying mechanisms may be very different in that
2 same patient.

3 Where that leads to is again the issue of
4 differentiating between the long-term use of a
5 medication and treating a long-term process,
6 because the two are very different, and I think we
7 need to stick with the way in which medicines are
8 likely to be used for the time being.

9 DR. FIRESTEIN: You have made some very
10 cogent points. I think that while the science has
11 progressed considerably with regard to mechanisms,
12 in the end right now we are faced with patients
13 that come into the clinic that may have multiple
14 mechanisms for a particular clinical syndrome that
15 we are going to be treating.

16 It is likely that at least for now, we
17 need to focus on the clinical presentation for many
18 patients.

19 Lee, I know that there is lots of people
20 that had additional comments, but we need to move
21 on. Are there any additional points that we need
22 to address for this section?

23 DR. SIMON: Not right now except Dr.
24 Goldkind has one more bit of information to add and
25 a question to ask.

1 DR. GOLDKIND: Some of this has been
2 addressed by Dr. Firestein. We need to remember
3 that ultimately, the common pathway for approving
4 an analgesic relates to the experience of pain, and
5 so it may be worth discussing whether an indication
6 that is mechanistic in development, but ultimately
7 relates to a metric that is somewhat global, might
8 not be the hybrid, you know, is allodynia
9 associated with a condition, that could be a
10 mechanistically driven indication, but it would
11 still have to ultimately be reflected in the
12 patient's experience.

13 I think we need to remember that the
14 patient ultimately needs to be impacted in a
15 meaningful way, and if it drives development to
16 allow more detail and description in the label or
17 some creativity in an indication, if there is an
18 important benefit to be accrued.

19 DR. FIRESTEIN: There is probably general
20 agreement with that.

21 I think we will end this session here. We
22 will take a 10-minute break, so that we can get
23 back on track. We will see you in a few minutes.

24 [Break.]

25 DR. FIRESTEIN: The next speaker is going

1 to be Dr. Lee Simon, the Division Director, and he
2 is going to talk to us about chronic pain and the
3 claim structure.

4 Claim Structure

5 Lee S. Simon, M.D.

6 DR. SIMON: Thank you, Dr. Firestein. I
7 would like to thank again the members of the
8 committee. I would like to take a moment and thank
9 the Divisions of OTC and 170 Anesthetics and
10 Critical Care, for lending us members of their
11 committee to join with the Arthritis Advisory
12 Committee given the fact that pain is such a broad
13 and extraordinary large indication, it affects so
14 many different syndromes and diseases, and much of
15 what you can see our discussion relates to, do you
16 do models or do you do diseases, and ultimately
17 end, as Dr. Witter had suggested, how we do that
18 depends on what we are trying to inform patients,
19 are we trying to inform patients about the
20 syndromes and diseases they suffer from and what
21 kinds of drugs then interfere with them, or are we
22 trying to think about ways that will do also
23 driving new drug development.

24 I think much of these next several
25 discussions that will be presented to you will have

1 a lot to do with that.

2 I would also like to just take a second to
3 acknowledge my entire division that has spent weeks
4 in putting these talks together. They have really
5 done a spectacular job, and I would like to
6 acknowledge the fact that this has been one of Dr.
7 Jim Witter's pet projects over the years, even
8 prior to my arrival, and is the culmination of a
9 lot of work for Jim, and I think he has done a
10 terrific job.

11 I would like to thank all of the guest
12 speakers, some of which you have not yet heard, but
13 given Dr. Woolf's superlative presentation, you can
14 imagine the level of conversations we will have and
15 presentations we will have.

16 In the context of chronic pain, let me
17 remind you I am talking now about things that our
18 division in 550, Analgesics, Anti-inflammatory and
19 Ophthalmologic Drug Products, have grappled with
20 and some of the advice that we have been providing
21 some of you sponsors in the audience so far as it
22 relates to the identity of chronic pain.

23 I think that it has been a really
24 informative discussion to think about chronic pain,
25 not just in the context of its chronicity, but also

1 in the context of how one uses a drug and how one
2 then thinks about the safety, thus, how one would
3 design a clinical trial to inform you about chronic
4 pain.

5 [Slide.

6 So, pain is always a subjective
7 experience. Some people are quite stoic. My wife
8 never seems to need any kind of anesthesia to get
9 her teeth worked on, whereas, I have to put to
10 sleep to get my teeth cleaned.

11 So, I think that the subjective experience
12 really defines a lot of what we are trying to
13 target here, and that is very important although
14 Dr. Woolf has mentioned that the patient global
15 response is not necessarily going to tell us much
16 about mechanisms, but don't forget the subjective
17 experience, it is important to know what the
18 patient feels about the therapeutic response and
19 whether they are adequately treated.

20 Everyone learns the meaning of pain
21 through experiences usually related to following
22 off your bike or falling around when you are trying
23 to be a toddler and trying to reach that breakable
24 thing on the chair or table above you.

25 As an unpleasant sensation, it becomes an

1 emotional experience over time, and it is clearly
2 not only a physical stress, but an emotional
3 stress, as well.

4 [Slide.

5 I have had a really interesting
6 opportunity. I was given the Merck Manual from
7 1899 as a gift when I participated as an author in
8 the Merck Manual of 1999, so it allowed me to look
9 back on pain and the therapy of pain in 1899 versus
10 what we think about in 1999, and what the changes
11 have been.

12 So, in one hundred years, as you heard
13 from Dr. Woolf's talk, there has been clear
14 progress in the field of understanding of pain,
15 defining painful disease states and syndromes,
16 along with delineating appropriate therapy.

17 [Slide.

18 That is shown by this comparison between
19 the original 1899 and now, 1999. So, this, in
20 fact, is the original page from the index of
21 indications from the 1899 Merck Manual,
22 demonstrating pain and the definitions of pain.

23 You will notice that hepatalgia is a very
24 important syndrome of pain in 1899, as was
25 odontalgia, otalgia, ovarian neuralgia, very

1 specific definitions as you can see, clearly
2 delineating the way we do today about different
3 kinds of pain.

4 Furthermore, this is the entire list of
5 available pain medications in 1899 that were
6 suggested. Yellow are some of the things that have
7 fallen out of favor, such as iodine or potassium
8 cyanide, something that would not be readily
9 available today for us to use.

10 On the other hand, the white actually
11 demonstrate the drugs that were available in 1899,
12 belladonna, chloral hydrate, codeine, morphine,
13 menthol, some of which may be similar to the kinds
14 of things we use today, like Arthritis-Eze, which
15 is always advertised on the TV about the use of
16 menthol, phenacetin, the parent product for
17 acetaminophen, and sulpyrine was what they referred
18 to as aspirin in those days. I actually didn't
19 know that.

20 [Slide.

21 So, looking now in 1999, this is just one
22 of the pages of the index on pain. As you can see,
23 we have clearly moved forward about categorizing
24 pain in various different ways, both by some of the
25 things you have heard about from Dr. Woolf, as well

1 as descriptors, such as after tooth extraction or
2 bladder pain, abdominal pain, psychogenic pain,
3 carpal tunnel syndrome, and this then actually goes
4 on for three pages.

5 [Slide.

6 What also interested us, the separate
7 Analgesics Index, which, in fact, goes on for
8 multiple pages, describes pain relief in terms of
9 acute postoperative pain, or in cancer pain
10 syndromes, or non-opiate drugs for pain,
11 nonsteroidals, opiate drugs, so, in fact, it is
12 really quite interesting how we have come along,
13 where we have been, and where we are today.

14 [Slide.

15 So, we have actually furthered our
16 description of pain, but even 100 years ago, we
17 fundamentally are using today the same fundamental
18 drugs that they were using then - opioids, morphine
19 and codeine, for example, nonsteroidals, as
20 evidenced by salaparendi [ph], "effective aspirin,"
21 it was called in those days, forms of sedatives
22 like chloral hydrate.

23 Well, we don't usually use chloral hydrate
24 today for pain relief, but we certainly use other
25 kinds of things that help people tolerate pain. We