

1 however.

2 DR. GREENBERG: Thank you. That was
3 helpful. So following history we start over there in
4 the right-hand corner. Dr. Edwards.

5 DR. EDWARDS: Yes.

6 DR. GREENBERG: We're doing 1(A) now. Just
7 1(A). I'm going to read the question to you again.
8 Can we use existing immunologic correlates to predict
9 protection -- we took out existing. Good. Can we use
10 immunologic correlates to predict protective efficacy
11 of meningococcal conjugate vaccines for individuals
12 for which the current polysaccharide vaccine is
13 licensed?

14 DR. EDWARDS: Yes. With the data that was
15 presented and the fact that we have a product that
16 appears to be superiorly immunogenic from the previously
17 licensed product makes me comfortable in saying yes.

18 DR. GREENBERG: Dr. Daum.

19 DR. DAUM: I want a new seat.

20 DR. GREENBERG: Pardon me?

21 DR. DAUM: I want a new seat.

22 DR. GREENBERG: No way. This is the big
23 leagues.

24 DR. DAUM: What about question zero?

25 DR. GREENBERG: I think we have an idea of

1 how this is going to be used. In fact, nobody is --
2 you know, this is assumed that this data is going to
3 be used to give the manufacturers some feeling about
4 what the informed and appropriate academic or
5 regulatory constituency thinks will be needed for
6 moving forward.

7 DR. DAUM: Well, do you want just one word
8 or do you want --

9 DR. GREENBERG: I want one word and a
10 relatively concise explanation of your word.

11 DR. DAUM: I feel wishy washy about this --
12 question because I heard data that suggested that two
13 different kinds of assays have promise of being very
14 valuable tools for assisting in what I think should be
15 done which is an efficacy trial in young infants. Am
16 I convinced that --

17 DR. GREENBERG: This is adults. This is
18 1(A).

19 DR. DAUM: This is 1(A). So my answer is a
20 qualified yes but I would like to have more data and
21 more clinical situations and address such issues as
22 duration of antibody response of primarian and
23 carriage to go with. It's a yes, I think we're on the
24 right track but I would like more.

25 DR. GREENBERG: I would just like to remind

1 people if I understand things right, this question of
2 correlates was already crossed with the polysaccharide
3 vaccine where efficacy was not demonstrated with the
4 Y and whatever the other value is --

5 DR. FERRIERI: W135.

6 DR. GREENBERG: -- because the same
7 question, it's impossible to do a study so correlates
8 were used for those already. You are not blazing
9 totally new ground here.

10 DR. FRASCH: It was also used when we went
11 from a 14 ml meningococcal vaccine to a 23 ml --
12 meningococcal vaccine.

13 DR. GREENBERG: Dr. Griffin.

14 DR. GRIFFIN: I think for the -- yes for the
15 license because we do have a background of a license
16 vaccine for which we know the kinds of responses we
17 can get which we can compare directly to the conjugate
18 vaccine. I'm comfortable with 1(A).

19 DR. GREENBERG: Dr. Snider.

20 DR. SNIDER: Yes, for the reasons that have
21 been articulated thus far. I would say that to the
22 extent that it seems reasonable to use more than one
23 immunologic correlate and I would supplement it with
24 whatever additional data on animal challenge Phase IV
25 data from the U.K. might be available at that time.

1 DR. GREENBERG: Dr. Stephens.

2 DR. STEPHENS: Yes.

3 DR. GREENBERG: Ms. Fisher?

4 MS. FISHER: This is for adults?

5 DR. GREENBERG: This is 1(A). This is
6 question 1(A) which is adults. The question is for
7 the people for whom the polysaccharide vaccine is
8 currently licensed.

9 MS. FISHER: I believe there should be
10 clinical trials. No.

11 DR. GREENBERG: Okay.

12 MS. ESTES: Yes, and I echo Dixie's
13 comments.

14 DR. GREENBERG: And I finally realize that
15 there is one good thing about being the chairperson
16 and that is you get to vote last.

17 DR. FAGGETT: Okay. I share Ms. Fisher's
18 concerns but I'll vote yes and really, Barbara, my
19 reason for it is I'm hearing that they are not
20 equating clinical trials with the correlates. There
21 is no way of equating. You know, there's not an equal
22 weight been given that clinical trials were mainly
23 gold standard and that's why I'm voting yes.

24 DR. GREENBERG: Dr. Karzon.

25 DR. KARZON: I vote yes. I would like the

1 FDA to look into the various methodologies used in the
2 assay controls and make certain that they are the best
3 possible to defend because there were differences that
4 were unresolved, various groups claiming excellence or
5 different levels of excellence.

6 For part A I don't happen to know what
7 permissiveness is stated in this category. Does that
8 mean all people right now?

9 DR. GREENBERG: Over the age of two.

10 DR. KARZON: So at the moment this means all
11 individuals above the age of 2.

12 DR. GREENBERG: Yes.

13 DR. KARZON: And it hasn't really been used
14 that way. Has it?

15 DR. GREENBERG: I think it has been used
16 that way.

17 DR. KARZON: I don't know many pediatricians
18 who at the age of two --

19 DR. GREENBERG: Not generally used that way
20 but if there's a case in a house and there's a kid
21 over the age of two, I think they --

22 DR. KARZON: So this is used on call with
23 concerns of epidemics?

24 DR. GREENBERG: No.

25 DR. FRASCH: The children of this country

1 beginning at age two are not being immunized with this
2 product. What I'm concerned about is what we are
3 permitting and what will be done under this 1(A).
4 Will this be a go-ahead to mandate or recommend that
5 all children beginning at two should have this
6 product?

7 DR. GREENBERG: I don't see -- I can't
8 imagine anybody anywhere coming away from this
9 conversation with that interpretation of what has
10 happened here.

11 DR. FRASCH: But the other thing is the FDA --
12 approves the CDC ACIP actually is the one who exactly
13 has a dyconomy about of these subjects.

14 DR. KARZON: Well, I think my thoughts have
15 been registered.

16 DR. GREENBERG: Yes. Good. Dr. Huang.

17 DR. HUANG: Oh, I agree with Dixie and
18 Walt's comments and I would only go so far as to say
19 that when these correlates are used and today because
20 we've heard about different types of correlates, that
21 there needs to be some standards set or outcomes
22 testing that would be extremely important for
23 accepting these kinds of correlates. My response is
24 yes.

25 DR. GREENBERG: Dr. Breiman.

1 DR. BREIMAN: I agree with that comment. I
2 also would want to echo what Dr. Griffin said that
3 really I think for 1(A) we're talking about
4 immunologic noninferiority based on the information we
5 have now anyway. If we look at it that way, I'm
6 comfortable.

7 DR. GREENBERG: And Dr. Ferrieri.

8 DR. FERRIERI: 1(A) I vote yes for all the
9 reasons articulated by Dixie Snider and others.

10 DR. GREENBERG: And, for the record, I incur
11 and think that you've all done a very good job of --
12 putting all the caveats that are important on that
13 answer. I would like to now move --

14 DR. FAGGETT: One question. Could we go
15 back to Barbara and see if she has had a change of
16 heart?

17 DR. GREENBERG: We can. I actually know
18 very little about parliamentary procedures. I do not
19 know whether legally I can do that but I'm happy to do
20 it. I think people vote their conscience and that is
21 fine with me.

22 DR. FAGGETT: I was just interested if she
23 had any different opinion.

24 DR. GREENBERG: Fine.

25 DR. FERRIERI: We like diversity of votes.

1 DR. GREENBERG: So I would like to now move
2 to question 1(B) and, of course, Dr. Edwards. You
3 know, we picked who sits in that seat. Let me read
4 the question again for you and that is can we use
5 immunologic correlates to predict protective efficacy
6 of meningococcal conjugate vaccines for infants and
7 toddlers below two years of age?

8 DR. BREIMAN: Can I just ask -- I'm sorry.
9 One more clarification. Is this like saying might it
10 be possible someday to?

11 DR. GREENBERG: Carl?

12 DR. BREIMAN: Is that what's meant or,
13 again, given the data that were currently presented --
14 I mean presented that are currently available.

15 DR. GREENBERG: So we took out existing.

16 DR. BREIMAN: I know but I just would like
17 Carl's nuance.

18 DR. GREENBERG: Carl, could you give us your
19 feeling about that?

20 DR. FRASCH: Once upon a time the -- I think
21 the question is very general, can we use immune
22 correlates. It doesn't really specify a time or
23 exactly the ones we heard today.

24 DR. GREENBERG: Bill.

25 MR. EGAN: Bill Egan from FDA. Yeah, I

1 think to get to the bottom line what we're talking
2 about is how to set up a trial that could be used to
3 demonstrate efficacy that could then be used for
4 licensure. The question turns out to be does an
5 immune correlate exist? First, for older individuals
6 and then for children under two that could be used to
7 support licensure. I mean, that's what we're talking
8 about here.

9 I think this addresses Dr. Karzon's comment
10 as well, what are you supporting and it's basically
11 the decided conduct of the trials to support
12 licensure. Ms Fisher was quite correct that vaccines
13 are licensed on the basis of their demonstrated safety
14 and efficacies.

15 DR. GREENBERG: Kathy.

16 DR. ESTES: I think, as everyone agrees,
17 this is a difficult question. I think it's maybe even
18 more difficult by the epidemiologic data for the U.S.
19 that is shown where a good percentage of the disease
20 is B. Certainly we are further behind in the
21 generation of a B vaccine. I think for the U.S. it's
22 going to be almost inconceivable that such a study
23 could be conducted here given the epidemiology
24 disease.

25 Then you would say, well, maybe this study

1 could be conducted in Africa looking at A. Then you
2 would have to suppose that the correlate of A immunity
3 is probably the same as C and D be correct.

4 I guess I'm struggling with the fact that
5 yes, as with apple pie and motherhood, it's always
6 better to have a randomized clinical trial, but also
7 I'm struggling with whether it's really doable with
8 the epidemiology of the disease that we have.

9 I guess what I would say I think that we
10 should prefer to have a randomized trial to determine
11 the efficacy and also to have serologic studies done --
12 so that if possible we can determine a correlate. But
13 if that's not feasible, I don't think that we should
14 say no and the vaccine could not be licensed without
15 using other correlates.

16 I feel that we really need to make certain
17 that all stops have been pulled out to try and get the
18 efficacy trial that we so deserve or desire, but that
19 we also have to be somewhat reasonable. If that's
20 totally inconceivable, then we should use additional
21 data such as immunologic correlates.

22 DR. GREENBERG: So your answer is a yes with
23 lots of --

24 DR. ESTES: Caveats.

25 DR. GREENBERG: -- qualifiers.

1 DR. ESTES: Right.

2 DR. GREENBERG: Thank you. Dr. Daum.

3 DR. DAUM: I think Kathy and I are really at
4 the same place. The only thing that I would, I guess,
5 like to raise again is if the word existing were in
6 that question for this age group, my answer would be
7 no. Otherwise, I agree with the philosophy and flavor
8 that Kathy espoused.

9 DR. GREENBERG: I think that is a very
10 important thing to get down, Nancy, because I wager
11 that if we put existing, and, Carl, you should be
12 listening to this, if existing were in that statement,
13 I'm willing to poll if you want it but I would bet the
14 answer to this will be no if we put existing in that
15 question. So I think that is just an important
16 message for everybody to hear.

17 Diane.

18 DR. GRIFFIN: I agree, for me at least,
19 because I do not feel currently comfortable,
20 particularly in this age group will I don't think that
21 we have a full understanding of what protection is and
22 that it may be different than it is in the older age
23 group. It may not be.

24 I mean, I think one possibility is you could
25 say, okay, if you've got the levels -- if you've got

1 exactly the same immunity as you get in adults, then
2 that would be great but that's highly unlikely we're
3 not going to get that in that group. I have a very
4 highly qualified -- I mean, to be highly qualified no
5 or a highly qualified yes but I'm very comfortable
6 with saying yes to this.

7 DR. GREENBERG: Okay. Dixie.

8 DR. SNIDER: Yes, with the qualifiers that
9 have already been stated.

10 DR. GREENBERG: Dr. Stephens.

11 DR. STEPHENS: Yes, with the emphasis on the --
12 clear need to develop a standardization of these
13 assays which I think is the message that we are all
14 kind of echoing.

15 DR. GREENBERG: Ms. Fisher.

16 MS. FISHER: No, I don't think there's
17 enough information. I think you cannot deal in
18 theoreticals. I think that we have to maintain the
19 highest standards as possible and that would include
20 particularly in children in a clinical trial to
21 demonstrate efficacy.

22 DR. GREENBERG: Dr. Estes.

23 DR. ESTES: I'm actually going to vote no on
24 this. I think the evidence that I've seen to date
25 does not convince me. At some point in the future I

1 might be convinced but I would vote no at this point.

2 DR. GREENBERG: Dr. Faggett.

3 DR. FAGGETT: Yes, I kind of agree with
4 those two previous speakers that this indeed is
5 another instance of a need for more clinical trials in
6 the pediatric age group. The way this question is
7 stated, however, in that we talk about using the
8 correlates to predict efficacy, then I will give a
9 qualified yes.

10 DR. GREENBERG: Okay. Dr. Karzon.

11 DR. KARZON: This is a very difficult -
12 decision to make. At one time, on the one hand, this
13 age group is at very great risk and they need this
14 vaccine eventually more than any other single group.
15 Yet, we have no experience with any vaccine of this
16 sort in infants at this point. There's a big conflict
17 in me to just go ahead.

18 We usually have more data on adverse events
19 before we proceed to full use licensure. In this age
20 group sometimes there are adverse events that may be
21 unique. I'm very reluctant at this time. I think
22 maybe the best pattern is to go ahead with the older
23 groups where we have some experience with these
24 vaccines and get more data.

25 I didn't want to say so when I was

1 suggesting what we have to do as a preamble, but if we
2 get material from the U.K., I didn't want that in the
3 record. Since somebody has brought it up, I would be
4 more comforted too. I am concerned about adverse
5 events that we can't imagine at this point. Most of
6 them we can't imagine that do show up. So I would go
7 and make that a second step.

8 DR. GREENBERG: So to get a precise answer
9 here, do you --

10 DR. KARZON: A precise answer would have to
11 be no. I think the basis of it is important because --
12 it is much needed.

13 DR. GREENBERG: Dr. Huang.

14 DR. HUANG: Not being a pediatrician, I
15 notice that our pediatric colleagues voted two to one
16 so I go along with yes.

17 DR. BREIMAN: Well, in the absence of more
18 standardized tests and also a better defined
19 threshold, I just want to make it clear that I would
20 vote no. Again, I'm reading this question as saying
21 assuming those things can be developed, would we at
22 some point use this approach to establish or predict
23 efficacy.

24 My belief is that we are going to need to do
25 that because, as I said before, the variety of

1 products that we are going to be evaluating. I think
2 the answer again is a qualified yes. At some point we
3 will need to use that but not until these other steps
4 are accomplished.

5 DR. GREENBERG: Dr. Ferrieri.

6 DR. FERRIERI: Well, I've given a lot of
7 thought to this and my final vote is a yes but with
8 qualifications so that my answer yes is on the basis
9 of acquiring more information on the immune response
10 and the translation of that to clinical efficacy from
11 any of the immunologic correlates. My vote of yes --
12 does not support or exclude in any way the use of
13 clinical efficacy trials.

14 DR. GREENBERG: Okay. And, for the record,
15 I vote yes with at least as many qualifications as
16 everybody else has added. I think that it would be a
17 mistake for anybody to come away from this thinking
18 anything other than we would like a lot more proof of
19 correlation before passing on a vaccine in infants for
20 licensure. That case was not made sufficiently here
21 is what I would say. That can be gotten, I hope.

22 Okay. I'm hoping that the next two
23 questions will flow from that first one very simply,
24 not the least of which is because I want to get out of
25 here. I am going to --

1 DR. FERRIERI: These are tougher.

2 DR. GREENBERG: So I thought we needed to
3 discuss that first one. It's a very hard question.
4 The second question is for both age groups can the
5 presence of bactericidal antibodies be used as a
6 measure of functional and, therefore, presumed
7 protective activity. I would just like to say Carl
8 has said for both age groups. It seems to me that to
9 shortcut this discussion, you just heard that people
10 have a lot greater feeling about the older age group
11 than the younger age group in the use of, I assume,
12 since the bactericidal looked like the better
13 correlate, that they feel much more comfortable in
14 that older age group. In some sense saying for both
15 age groups is obscuring this question a little bit but
16 we'll go with it the way you have written it. Do I
17 have --

18 DR. STEPHENS: Can we discuss this question?
19 We haven't.

20 DR. GREENBERG: Not really so let's discuss
21 the question if you want to discuss it.

22 DR. FERRIERI: I would like to make a point
23 regarding this issue and that is the relative
24 protection from disease within the first two months or
25 so of life is a reflection of placental transfer and

1 maternal antibody in individuals who fall within
2 various Fothergill Wright types of curves. So by
3 inference, even in the youngest age groups we might
4 presume that the serum bactericidal activity is a
5 correlate of protective activity independent of age.

6 DR. GREENBERG: Dr. Stephens.

7 DR. STEPHENS: Can I ask for a
8 clarification? Do you mean antibodies or do you mean
9 activity, Carl? Although we presume that these are
10 bactericidal antibodies, and I think that's right,
11 it's activity that the assays, in fact --

12 DR. FRASCH: It's bactericidal activity.
13 However, I would like to make a comment. I think my
14 impression is that some people are confusing the
15 correlate with how they are going to measure the
16 correlate, i.e., the rabbit complement or human
17 complement or the dilution and so on. I don't want to
18 get involved with the how as much as the correlate
19 itself.

20 DR. GRIFFIN: I guess I would ask for one
21 clarification. Do you mean as the sole measure here?
22 It says as the measure.

23 DR. GREENBERG: No. It was changed. Any
24 other discussion of this question? Dr. Daum.

25 DR. DAUM: I would like to ask, I guess, my

1 sort of standard question. Do you mean existing
2 information or do you mean -- I mean there are two
3 ways you can interpret this. One, a prospective
4 randomized trial was done today and sera were taken
5 from the control group and from the experimental
6 group. The kids who were protected all had
7 bactericidal activity. The kids that were not
8 protected didn't. Would I accept that? Of course I
9 would.

10 In the absence of such a trial with just
11 what we've heard and just what exist, is there enough --
12 information to say that I know what the protective
13 bactericidal activity level is and I'm comfortable
14 predicting efficacy from it? That's a different
15 question.

16 DR. FRASCH: I don't think I see the word
17 level in the question.

18 DR. DAUM: So we're talking presence or
19 absence.

20 DR. FRASCH: Yes. We're not trying to pin
21 down any level. I thought we just heard earlier today
22 a very convincing study from Ft. Dix. They bleed all
23 the recruits when they arrived, they figured out who
24 had bactericidal at the initiation of their training.
25 They waited to see who got disease and who didn't get

1 disease. Then they sorted out whether they fell into
2 the group with or without bactericidal activity.

3 DR. DAUM: There weren't many children in
4 that study.

5 DR. FRASCH: I don't think we're talking
6 specifically children.

7 DR. GREENBERG: It says for all age groups
8 there, or for both age groups.

9 DR. FRASCH: I'm just saying the study that
10 he's talking about was done in adults and not in
11 children but the study was done. I think we had this --
12 same problem initially with hemophilus in that we
13 didn't really know or didn't accept that because
14 bactericidal is protective in the older population
15 that it is protective in the infant. I think these
16 are some of the same problems we had then.

17 DR. GREENBERG: Dr. Karzon.

18 DR. KARZON: I'm a little puzzled in the
19 sense that two we voted on when we voted for one.

20 DR. GREENBERG: Well, not --

21 DR. KARZON: We --

22 DR. GREENBERG: Dr. Egan.

23 DR. EGAN: If I could try to just shed a
24 little bit of light in this again. The question one
25 was really asking does the correlate of immunity exist

1 now for older kids, for younger kids. We voted on
2 that. If you said yes to one, then I think the second
3 question is asking is this the correlate of immunity.
4 Is that right, Carl?

5 DR. FRASCH: Yes. Exactly.

6 DR. EGAN: So now you're asking for everyone
7 who voted yes is this the correlate of immunity.

8 DR. STEPHENS: I think it's not the word
9 "the."

10 DR. EGAN: A correlate. I stand corrected.
11 A correlate of immunity. There may well be more than
12 one. Is this a correlate of immunity.

13 DR. GREENBERG: And a correlate of immunity
14 doesn't mean a sufficient correlate of immunity in my
15 mind.

16 DR. EGAN: Well, a correlate of protection.

17 DR. GREENBERG: Well, I mean, I think that
18 is the critical question here as to whether we are
19 saying this is a sufficient correlate of protection to
20 be used for registration.

21 DR. EGAN: If I want to go back to follow
22 Ann and talk about history, the first three Hib
23 conjugate vaccines were used in infants. Those were
24 licensed on the basis of efficacy trials. The fourth
25 one, the Pasteur Merieux Connaught conjugate vaccine,

1 that was based on a correlate of immunity, namely the
2 level of serum antibodies, the .15 and 1 microgram per
3 ml that Carl mentioned before.

4 DR. GREENBERG: I think --

5 DR. GRIFFIN: But it's different having had
6 those three trials.

7 DR. GREENBERG: Oh, you bet it's different.
8 I am reading this as it is a measure. We're not
9 saying it is a sufficient measure for basing
10 licensure. I think we can go ahead and ask the
11 question now.

12 DR. ESTES: For both age groups I think
13 it's quite clear that bactericidal antibodies are
14 functional assays. That's how they are measured. As
15 was said before, the protective antibody against
16 encapsulated bacteria is a bactericidal antibody. I
17 think I would answer yes to this question.

18 DR. GREENBERG: Dr. Daum.

19 DR. DAUM: I can't help it. I end up
20 confused about what the question is really asking. I
21 don't want to raise the points again because we've
22 already raised them. I think that this bactericidal
23 activity can be used probably to predict efficacy and
24 outcome and I still would like to see a trial where
25 this is one of the things that is measured and

1 particularly for young children.

2 DR. GREENBERG: So I would say your answer
3 is yes but you're concerned that it's not sufficient
4 for registration.

5 DR. DAUM: Particularly for young children.

6 DR. GREENBERG: Yes. Dr. Griffin.

7 DR. GRIFFIN: Yes, necessary but not
8 sufficient.

9 DR. GREENBERG: Dr. Snider.

10 DR. SNIDER: I'd say yes. The presence of
11 the bactericidal antibodies can be used as a measure. —
12 I think other measures should be used. Even in regard
13 to that measure, people are going to bring data before
14 this committee. I think that we would like to see, as
15 a personal opinion, that the laboratory that was
16 performing it, either there was more than one
17 laboratory performing it or there was some kind of
18 quality assurance to give us reassurance that what
19 that one laboratory was measuring could be validated
20 in another laboratory.

21 DR. GREENBERG: Dr. Stephens.

22 MS. CHERRY: Before we go, I'm sorry. I
23 missed the first couple of votes. Can I have the one-
24 word answers?

25 DR. GREENBERG: They were yes, yes, yes, and

1 yes.

2 MS. CHERRY: Okay.

3 DR. GREENBERG: Dr. Stephens.

4 DR. STEPHENS: Yes, I think it can be used.
5 The presence of bactericidal activity -- again, I want
6 to emphasis that point -- can be used as a measure of
7 functional protective activity. I think there are a
8 lot of caveats that have already been echoed and I
9 support those caveats.

10 DR. GREENBERG: Ms. Fisher.

11 MS. FISHER: It would seem that the evidence --
12 that was present today does suggest that the presence
13 of bactericidal activity is involved in immunity.
14 However, I'm having trouble with how the question is
15 asked here because I do think that it is very strong
16 in suggesting that could be used as the only correlate
17 when we don't know if there are other factors involved
18 in truly enduring immunity.

19 DR. GREENBERG: I think you are correct and
20 I think everybody else. You can say yes and say but
21 I don't think it's sufficient to judge for efficacy.
22 It is a measure. Or you can vote no.

23 MS. FISHER: If I vote yes, then with that
24 kind of caveat is that on the record or -- I mean, are
25 all these caveats on the record?

1 DR. GREENBERG: I hope so. We are being
2 recorded. Every hiccup I make is on the record I
3 hope.

4 MS. CHERRY: Yes, there is a transcript.
5 This is an open meeting. The transcript will be on
6 the Internet.

7 MS. FISHER: Because intellectually I think
8 my answer would be yes, there is evidence that it is
9 involved in immunity but clearly we have large gaps in
10 knowledge in knowing if it is the only factor involved
11 in true immunity, particularly in children.

12 DR. GREENBERG: Okay. Thank you.

13 MS. CHERRY: That's a qualified yes?

14 MS. FISHER: Yes.

15 DR. GREENBERG: Dr. Estes.

16 DR. ESTES: I also vote a qualified yes with
17 the qualifications that have been said.

18 DR. GREENBERG: Dr. Faggett.

19 DR. FAGGETT: I agree that the presence of
20 bactericidal activity is a measure and I do give a
21 qualified yes to that fact.

22 DR. GREENBERG: Dr. Karzon.

23 DR. KARZON: I say yes with the same
24 caveats.

25 DR. GREENBERG: Dr. Haung.

1 DR. HUANG: Yes with the same caveats.

2 DR. GREENBERG: Dr. Breiman.

3 DR. BREIMAN: And I would say yes, we can
4 use it but we don't know how to use it.

5 DR. GREENBERG: And, for the record, I vote
6 yes with all of the same -- oh, I'm sorry. Who did I
7 miss?

8 DR. FERRIERI: We will remember.

9 DR. GREENBERG: I'm sure of it.

10 DR. FERRIERI: I vote yes, Harry, and I want
11 for the record to indicate that I think we need more
12 information on the younger children.

13 DR. GREENBERG: And I agree and I vote yes.
14 So we are now down to the last question and we'll see
15 how quickly we can deal with this. Can total antibody
16 quantitative by ELISA be used as a surrogate for
17 functional bactericidal antibody and, therefore, for
18 protection? That's the question. Do I have any
19 discussion?

20 DR. HUANG: Harry, I think this one the
21 wording is such that total antibody and that
22 immediately reminds us of the comparisons between the
23 high avidity ELISAs and the IgG versus total antibody.
24 It is clear that total antibody does not correlate
25 with functional bactericidal activity and does not

1 correlate with protection. I think this is fairly
2 straight off now.

3 DR. FERRIERI: I agree with Alice.

4 DR. GREENBERG: Do I have any other
5 discussion of that before we have a vote? Dr. Daum,
6 do you want to discuss it?

7 DR. DAUM: I have two very brief comments.
8 First of all, we heard about three different ELISAs,
9 at least broadly speaking. I think the answer might
10 not be the same to all three. At least mine wouldn't.
11 Secondly, I think it was Dr. Huang that said it —
12 doesn't correlate with bactericidal. I think it did
13 correlate but much less. I think there was still a
14 correlation.

15 DR. HUANG: Total antibody did not.

16 DR. DAUM: Even total correlated but it's
17 just would we be happy with it. The answer to that is
18 clearly no because the correlation was much lower but
19 it was still a correlation.

20 DR. HUANG: Not in quantitation. That's the
21 second word you have to read.

22 DR. GREENBERG: Okay. Any other comments
23 about this question?

24 DR. FERRIERI: Well, I would like to clarify
25 something Carl put up at the end, the data on the

1 British Columbian study in children two to six
2 years. If I understood the data then, Carl, and this
3 is what unsettles me so much, in the children two to
4 six years, of whom a very high percentage had antibody
5 greater than two micrograms by ELISA, there was a
6 disfunction, lack of correlation with those who had a
7 bactericidal titer that was -- this is where I'm not
8 sure of -- greater than 1 to 4 or greater than or
9 equal to 1 to 4?

10 DR. FRASCH: No, greater than.

11 DR. FERRIERI: Greater than 1 to 4. I guess --
12 we need it broken down for those who are just 1 to 4.
13 I find that as well as other data presented today to
14 undermine my confidence and this is why I don't feel
15 I can vote yes for this.

16 DR. FRASCH: I think since you mentioned the
17 slide from Vancouver, I think clearly the ELISA that
18 was used for that assay did not correlate.

19 DR. GREENBERG: Before we start voting, I'd
20 like to make one statement for the record. That is,
21 in this type of discussion that is actually relatively
22 technical and very data driven rather than notion
23 driven, I find it hard to analyze the data for the
24 first time at this meeting and to be as on top of it
25 as I could be.

1 The next time we do this, if we could get
2 the serology and the comparisons beforehand. Instead
3 of if I sit there on the airplane getting bored and
4 not wanting to do my reviews, I might be a better
5 informed panel member. I know that is sometimes
6 difficult. This type of stuff with a 30-year history
7 of serology, we could have been better prepped. Now
8 I will ask Dr. Edwards.

9 DR. EDWARDS: I think using the data that
10 the PMC, for instance just as one example, clearly
11 shows that there is a disconnect between the ELISA and
12 the bactericidal assays. Given all the data that was
13 presented about the problems with the ELISA, I think
14 that I strongly feel that I must answer no to this,
15 that the total ELISA antibody does not appear to be a
16 surrogate for functional activities because we really
17 weren't shown that.

18 Now, whether it may ultimately buy
19 additional assays or refinements or other things, that
20 is another issue. But with what we were shown today,
21 no, there does not appear to be a correlation or it
22 cannot be a surrogate.

23 DR. GREENBERG: Dr. Daum.

24 DR. DAUM: I concur with Kathy's comments
25 but would like to say one other thing. That is, that

1 I saw data from two other ways of doing the ELISA
2 which looked like they were promising. Those were
3 presented from Chiron and Dr. Granoff and many others
4 who worked on that. Also from Dr. Medor from Wyeth.

5 I would like to see more data about those
6 two approaches. I don't understand why high avidity
7 antibody would correlate better and why low avidity
8 antibody wouldn't. Without understanding that, I'm
9 reluctant to get real excited about saying yes to
10 that.

11 They certainly put up on a graph with a -
12 bactericidal antibody and high avidity antibody, or
13 Dr. Medor's company's technique. Those look like they
14 have promise. While the total antibody ELISA, clearly
15 I would not be enthusiastic about the correlation
16 which looked fairly poor to me. The other two
17 techniques looked like with explanation and
18 underpinnings and more data might be useful.

19 DR. GREENBERG: So the answer was no with
20 those caveats. Correct?

21 DR. DAUM: The answer as it's written.

22 DR. GREENBERG: Yes. Dr. Griffin.

23 DR. GRIFFIN: No, I don't think we have the
24 data currently to be able to make that correlation.

25 DR. GREENBERG: Dr. Snider.

1 DR. SNIDER: Well, I mean, I think basically
2 the answer is no if we're talking about just total
3 antibody. I mean, we heard one quote "total antibody"
4 that upon questioning seemed to be high affinity
5 antibody. I mean, as stated the answer is no. I
6 don't know why do that. Why try to make the leap, at
7 least at this particular point in time when there are
8 better correlations.

9 DR. GREENBERG: Dr. Stephens.

10 DR. STEPHENS: I think the answer to the
11 question is no. I'm just wondering why the question -
12 was even asked.

13 DR. GREENBERG: I'll let you ask that off
14 the record. Ms. Fisher.

15 DR. FISHER: No. Conflicting data and not
16 enough data.

17 DR. GREENBERG: Dr. Estes.

18 DR. ESTES: No, but I saw data today that I
19 thought was potentially encouraging and so I think
20 there is a chance in the future that this might be
21 able to be developed.

22 DR. GREENBERG: Dr. Faggett.

23 DR. FAGGETT: Presently stated the shoe does
24 not fit. I vote no.

25 DR. GREENBERG: Dr. Karzon.

1 DR. KARZON: I would have to say no on this
2 one until the issue is clarified.

3 DR. GREENBERG: Dr. Huang.

4 DR. HUANG: I agree with Drs. Daum and
5 Estes. I vote no.

6 DR. GREENBERG: Dr. Breiman?

7 DR. BREIMAN: No.

8 DR. GREENBERG: Dr. Ferrieri?

9 DR. FERRIERI: No.

10 DR. GREENBERG: For the record, I vote no as
11 well. Does this bring the meeting to a close?

12 MS. CHERRY: This brings the meeting to a
13 close except for one quick announcement.

14 DR. GREENBERG: So this brings the meeting
15 to a close as far as I'm concerned. I would like to
16 thank the panel for dealing with such a hard question.
17 We will probably see you all in November. Hopefully
18 there won't be another hurricane on its way. Happy
19 travels.

20 (Whereupon, the meeting was adjourned at
21 2:45 p.m.)

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CERTIFICATE

This is to certify that the foregoing transcript in the
matter of: MEETING SESSION 7

Before: VACCINES AND RELATED BIOLOGICAL
PRODUCTS ADVISORY COMMITTEE

Date: SEPTEMBER 15, 1999

Place: BETHESDA, MARYLAND

represents the full and complete proceedings of the
aforementioned matter, as reported and reduced to
typewriting.


