



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Ramachandra
Naik -S

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cn=Ramachandra Naik -S
Date: 2021.04.20 17:56:39 -04'00'

Food and Drug Administration
Silver Spring, MD 20993

**CENTER FOR BIOLOGICS EVALUATION AND RESEARCH
OFFICE OF VACCINES RESEARCH AND REVIEW
DIVISION OF VACCINES AND RELATED PRODUCTS APPLICATIONS**

DATE: April 20, 2021 **PAGES:** 2

TO: **Pfizer. Inc./BioNTech SE**
Attention: Neda Aghajani Memar
235 East 42nd Street, 219/9/69
New York, NY 10017
Phone: 212-733-2613
Fax number: 845-474-3500
E-mail: Neda.Aghajani.Memar@pfizer.com

FROM: **Ramachandra Naik, Ph.D.**
Division of Vaccines and Related Products Applications
Office of Vaccines Research and Review
Center for Biologics Evaluation and Research
10903 New Hampshire Avenue
Silver Spring, MD 20993-0002
Phone number: 301-796-2640
Fax number: 301-595-1244

CBER Reference: EUA 27034 amendment 132

EUA Title: Human Coronavirus mRNA Vaccines (SARS-CoV-2 Spike Protein; BNT162b2) in Lipid Nanoparticles (ALC-0315, ALC-0159, DSPC and Cholesterol) (Pfizer-BioNTech COVID-19 Vaccine)

SUBJECT: CBER comments regarding data analysis programs and datasets

Dear Ms. Harkins:

Reference is made to the amendment 132 (dated April 9, 2021) to your EUA 27034 to extend the emergency use authorization of the Pfizer-BioNTech COVID-19 Vaccine to individuals 12-15 years of age. We have the following comments regarding data analysis programs and datasets:

1. The analysis program for derivation of the ADSL data set entitled "adsl-sas – 12-15 EUA Amendment" is unreadable. Please resubmit this file.

2. Please submit the analysis program for Table 19 of the EUA Amendment - 12-15 Years, i.e., vaccine efficacy - First COVID-19 Occurrence From 7 Days After Dose 2 – Blinded Placebo-Controlled Follow-up Period – Subjects 12 Through 15 Years of Age and With or Without Evidence of Infection Prior to 7 Days After Dose 2 – Evaluable Efficacy (7 Days) Population.
3. The Analysis Dataset Definition indicates that ADSL.PEDIMMFL is a derived variable. Please clarify the source dataset for deriving this variable.
4. We have some questions regarding the derivation of the EV1MD2FL, which determines whether the subjects are included in the immunogenicity non-inferiority (NI) analysis or not, for the following subjects:
 - a. Subjects 10771292, 11521635, 11521637, 11521655, 11421350, 10571403, and 10441241 were excluded from the NI analysis because EV1MD2FL='N'. However, there do not appear to be any COVID episodes for these subjects; all available PCR tests were negative; and all N-binding assay results were negative. Please clarify why these subjects had 'N' as the value for EV1MD2FL.
 - b. You included the following subjects in the NI analysis, i.e., EV1MD2FL='Y'. However, we are not able to verify that these subjects do not have evidence of infection prior to 1-month post Dose 2 according to the programming logic:
 - i. Subject 12041061 had COVID symptoms from 2021-01-03 to 2021-01-12, and the subject had a positive PCR using a local test on 2021-01-04.
 - ii. Subject 11461316 had COVID symptoms from 2021-01-30 to 2021-01-31, and the subject had no PCR tests available for this COVID episode.
 - iii. Subjects 10221112 and 10091070 had COVID symptoms from 2021-01-05 to 2021-01-08 and from 2021-01-11 to 2021-01-14, respectively, and their local PCR tests were negative. The local PCR tests were not in the list of NAAT that can be used for case confirmation. Please clarify if all local PCR results, regardless of whether the results can be used for case confirmation, are used to define the NI analysis population.

Please submit your responses to the above comments as an amendment to your EUA 27034 by Thursday, April 22, 2021.

If you have any questions, please contact me by email: ramachandra.naik@fda.hhs.gov or at 301-796-2640.