Michael J. Smith -S4
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Date: 2022.03.07 16:10:08 -05'00'

**From:** Smith, Michael (CBER)
**Sent:** Monday, March 7, 2022 4:09 PM
**To:** Collins, Kathleen Mary Catherine (b) (6)
**Cc:** Naik, Ramachandra <Ramachandra.Naik@fda.hhs.gov>; Gottschalk, Laura <Laura.Gottschalk@fda.hhs.gov>; Mineo, Gosia (b) (6) Harkins Tull, Elisa <Elisa.HarkinsTull@pfizer.com>; Devlin, Carmel M <Carmel.Devlin@pfizer.com>
**Subject:** STN 125742/45 – Comirnaty sBLA – Clinical-statistical comments regarding updated immunobridging analyses and solicited adverse reaction frequencies

Dear Ms. Collins,

Our review of the information provided in your sBLA STN 125742/45 for COMIRNATY (COVID-19 mRNA Vaccine) for active immunization to prevent COVID-19 caused by SARS-CoV-2, to include individuals 12 through 15 years of age, is ongoing. We have the following comments and requests for additional information.

1. The submitted immunobridging data (adolescents 12 through 15 years of age vs. young adults 16 through 25 years of age in Study C4591001) with an estimated geometric mean titer ratio of 1.76 and a seroresponse rate difference of -2.1% appear to be based on an LLOQ of 20. Please confirm whether the assay LLOQ has been revised to 41. Please provide updated immunobridging analysis results (i.e., geometric mean titer ratio and seroresponse rate difference) as appropriate.

2. Please clarify whether additional solicited adverse reaction data for adolescents 12 through 15 years of age in Study C4591001 have been collected up to the September 2, 2021 data cutoff since EUA issuance. Please submit updated solicited adverse reaction frequencies as appropriate, annotating any changes to the results.

Please provide your response in an Amendment to STN 125742/45, as soon as possible. If you have any questions about this communication, please feel free to contact us.

Regards,

Mike

- Please confirm receipt of this email and let us know if you have any questions.

**Mike Smith, Ph.D.**
**Captain, USPHS**

**Senior Regulatory Review Officer**
**Food and Drug Administration**
**Center for Biologics Evaluation & Research**
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