



BLA 125514/S-123

**SUPPLEMENT APPROVAL/  
FULFILLMENT OF POSTMARKETING COMMITMENT**

Merck Sharp & Dohme Corp., a subsidiary of Merck & Co., Inc.  
Attention: Jennifer Kershner, MS  
Director, Global Regulatory Affairs  
351 North Sumneytown Pike, P.O. Box 1000  
North Wales, PA 19454

Dear Ms. Kershner:

Please refer to your supplemental biologics license application (sBLA), dated and received September 23, 2021, and your amendments, submitted under section 351(a) of the Public Health Service Act for Keytruda (pembrolizumab) injection.

This Prior Approval supplemental biologics license application provides for revisions to the USPI to include additional efficacy results based on the final analysis of the study KEYNOTE-355, entitled, "*A Randomized, Double-Blind Phase III Study of Pembrolizumab (MK-3475) plus Chemotherapy vs. Placebo plus Chemotherapy for Previously Untreated Locally Recurrent Inoperable or Metastatic Triple Negative Breast Cancer.*"

**APPROVAL & LABELING**

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling.

**WAIVER OF HIGHLIGHTS ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS**

Please note that we have previously granted a waiver of the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of Prescribing Information.

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 601.14(b)] in structured product labeling (SPL) format, as described at FDA.gov,<sup>1</sup> that is identical to the enclosed labeling (text for the Prescribing Information

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<sup>1</sup> <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

and Medication Guide) and include the labeling changes proposed in any pending “Changes Being Effectuated” (CBE) supplements.

Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*.<sup>2</sup>

The SPL will be accessible via publicly available labeling repositories.

Also, within 14 days, amend all pending supplemental applications that include labeling changes for this BLA, including pending “Changes Being Effectuated” (CBE) supplements, for which the FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] in Microsoft Word format that includes the changes approved in this supplemental application, as well as annual reportable changes. To facilitate review of your submission(s), provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

### **REQUIRED PEDIATRIC ASSESSMENTS**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because none of these criteria apply to your application, you are exempt from this requirement.

### **FULFILLMENT OF POSTMARKETING COMMITMENT**

We have received your submission dated December 17, 2021, containing the final report for the following postmarketing commitment listed in the July 26, 2021, approval letter for BLA 125514/S-089.

- 4118-2 Submit the final overall survival (OS) analysis and datasets with the final report from the ongoing clinical trial, KEYNOTE-355, titled “A Randomized, Double-Blind, Phase III Study of Pembrolizumab (MK-3475) Plus Chemotherapy vs Placebo Plus Chemotherapy for Previously Untreated Locally Recurrent Inoperable or Metastatic Triple Negative Breast Cancer.”

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<sup>2</sup> We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

We have reviewed your submission and conclude that the above commitment was fulfilled.

We remind you that there is postmarketing commitment listed in the July 26, 2021, approval letter that is still open.

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the final guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs*.<sup>3</sup>

As required under 21 CFR 601.12(f)(4), you must submit final promotional materials, and the Prescribing Information, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at [FDA.gov](http://FDA.gov).<sup>4</sup> Information and Instructions for completing the form can be found at [FDA.gov](http://FDA.gov).<sup>5</sup>

### **REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, contact Jessica Kim, Regulatory Project Manager, at 240-402-0883 or [Jessica.Kim1@fda.hhs.gov](mailto:Jessica.Kim1@fda.hhs.gov).

Sincerely,

*{See appended electronic signature page}*

Laleh Amiri-Kordestani, MD  
Director  
Division of Oncology 1  
Office of Oncologic Diseases  
Center for Drug Evaluation and Research

### **ENCLOSURE(S):**

- Content of Labeling
  - Prescribing Information
  - Medication Guide

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<sup>3</sup> For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

<sup>4</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>5</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

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**This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.**  
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/s/  
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