



February 3, 2011

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re: Docket No. FDA-2010-D-0616, "Guidance for Industry: Codevelopment of Two or More Unmarketed Investigational Drugs for Use in Combination"

Dear Sir or Madam:

The Melanoma Research Alliance (MRA) welcomes the opportunity to provide commentary in response to the FDA request for information about the development of combinatorial therapies. Founded in 2007, MRA is a public charity focused on accelerating the pace of scientific discovery and its translation to eliminate suffering and death due to melanoma and has awarded \$22 million to 50 research programs worldwide to support these goals.

Issues of the implementation and regulation of combinatorial therapies are generic to oncology but are particularly relevant in melanoma. The paucity of FDA-approved agents for treating melanoma, coupled with recent scientific advances and the emergence of promising new drugs targeting immunologic and signaling pathways, suggest that melanoma could be the ideal model system in which to base FDA guidelines for combinatorial therapies.

Melanoma is the most immunogenic of human cancers. Therefore, the development of treatment combinations incorporating immune-based therapies such as vaccines, gene therapies and adoptive cellular therapies is particularly relevant to melanoma patients. It is concerning that the current draft guidance specifically excludes these treatment modalities and is limited to drugs regulated by the Center for Drug Evaluation and Research (CDER). We hope to see similar guidance emerging from the Center for Biologics Evaluation and Research (CBER) or, ideally, to have such guidance incorporated into one unified FDA document. Rational clinical research efforts in melanoma, supported by evidence from preclinical models, involve combining different forms of immunotherapy with each other, as well as combining immunotherapies with molecularly targeted therapies. Thus, it will be important to harmonize guidance on the codevelopment of all types of cancer treatments.

We also would like to take this opportunity to reiterate two important issues included in MRA's earlier comments. Given that combinatorial strategies will be easier to develop when one of the components is already approved as a single agent, enhancements of the accelerated approval process for new drugs would have important benefits for combination approaches. Secondly, clearly articulated policies for toxicity attribution and drug labeling that would allow single agent development pathways to proceed unfettered by toxicities that may arise when the agent is used in a novel combination would be helpful.

The development of combinatorial treatment approaches that bring better therapeutic options to melanoma patients is an area of particular importance to MRA. We applaud the FDA's commitment to clarifying the regulatory process to encourage innovation in this area and welcome opportunities to work with FDA to advance new guidance to benefit patients.

Sincerely,

A handwritten signature in black ink that reads "Wendy Selig".

Wendy K.D. Selig  
MRA President and Chief Executive Officer

A handwritten signature in black ink that reads "Suzanne Topalian".

Suzanne L. Topalian, M.D.  
MRA Chief Science Officer