

107 College Road East Princeton, NJ 08540 Tel: 609.608.1246 jcalvarez@drreddys.com

VIA EMAIL – AGO.highcostprescriptiondrugs@vermont.gov

April 22, 2021

Vermont Attorney General's Office 109 State Street Montpelier, VT 05609

RE: <u>New Prescription Drug – 30 -Day Notice</u>

Dear Sir or Madam,

In accordance with 18 V.S.A. § 4637, Dr. Reddy's Laboratories, Inc. provides the following notification:

NDC:	43598-0477-30
Product Description:	Sapropterin Dihydrochloride Sachets, 100 mg, 30 Sachets
Date of Introduction to Market:	4/6/2021
WAC:	870.48
Description of the marketing and pricing plans used in the launch of the new drug in the United States and internationally	Dr. Reddy's did not develop direct-to-consumer marketing or paid advertising for the product. In addition, we do not directly promote the product to physicians. To the extent that our purchasing agents or buyers are licensed pharmacists or HCPs we may provide them with product sell sheets which include product name, product description, available pack information, and order entry details. The spend on such materials is less than \$5,000 per year. Sapropterin dihydrochloride sachets 100mg (ANDA #209452) is the generic equivalent of an existing innovator product and is being marketed in the generic multi-source space. Accordingly, establishing the WAC price at \$870.48 constitutes a significant reduction in the WAC pricing of the referenced listed drug, Kuvan, which, upon information and belief, was \$1,260.00 at the time Dr. Reddy's introduced Sapropterin dihydrochloride 100mg into the market, representing a 31% reduction in price. Dr. Reddy's WAC pricing will enable it to: i) recoup the costs it incurred in evaluating the economic and/or intellectual property landscape surrounding a prospective Sapropterin dihydrochloride 100mg product, sourcing the active pharmaceutical ingredient (API), sourcing excipients, conducting R&D to achieve the acceptable formulation of the product, conducting biostudies, conducting stability studies, developing analytical methods, paying GDUFA and facility fees, submitting the ANDA and responding to FDA deficiencies and inquiries; ii) cover its manufacturing costs; iii) cover the cost of any associated patent litigation, including legal and expert witness fees, if any; iv) cover distribution costs; v) provide rebates and discounts as required by partners in the

	supply chain; vi) compete with numerous other available generics; and vii) earn a
	reasonable return on investment.
The estimated volume of patients that may be prescribed the drug	Dr. Reddy's does not track the estimated number of patients to be prescribed a drug on a monthly basis, due, among other reasons, to the fact that this is a generic product with numerous other generics available. Notwithstanding, according to the National Organization for Rare Disorders, the reported incidence of Phenylketonuria (PKU) from newborn screening programs ranges from one in 13,500 to 19,000 newborns in the United States However, Dr. Reddy's lacks sufficient information to determine the total number of patients who may be prescribed its Sapropterin dihydrochloride sachets 100mg product given, among other things, (i) the unknown size of the prospective patient population meeting the relevant criteria; (ii) the current existence of numerous other prescription drugs with the same active pharmaceutical ingredient; and (iii) the existence of numerous other prescriptions drugs to treat these same conditions.
Was the drug granted breakthrough therapy designation by the federal Food and Drug Administration (FDA) prior to final approval?	N
Did the drug receive a priority review by the federal Food and Drug Administration prior to final approval?	N
The date and price of acquisition if the drug was not developed by the manufacturer	NA/NA

Please do not hesitate to contact us if you have any questions.

Regards,

Juan Alvarez Government Contracts & Pricing Dr. Reddy's Laboratories, Inc.