Merck Serono

MERCK

Mr Jeremy Powell
National Institute of Health and Care Excellence
1st Floor
10 Spring Gardens
London
SW1A 2BU

Date: 7th October 2013

Dear Mr Powell,

Re: **NICE Appraisal consultation document - Multiple sclerosis (relapsing) teriflunomide [ID548]**

Merck Serono is grateful for the opportunity to comment on the appraisal consultation document (ACD) for teriflunomide for treating relapsing forms of multiple sclerosis which we received on 11th September 2013.

We have reviewed the ACD along with the manufacturer's submission. We acknowledge the views of the appraisal committee and support the case for additional and subsidiary analysis to be conducted in order to reduce the uncertainty around the clinical and cost effectiveness of teriflunomide, especially when compared to other available treatments.

We also noted that adherence to oral medications was not considered in the economic analysis. This was presumably since this analysis draws its data from controlled trials where patients are followed up closely to ensure adherence to the treatment regimen. However, this does not reflect patient treatment in real life. This could possibly have significant impact on the clinical and cost effectiveness of any multiple sclerosis treatment. In light of this Merck Serono believe that an assumption for the level of patient adherence to teriflunomide treatment should be treated as an uncertainty and should be considered within the economic analysis.

Yours sincerely,

[redacted]

Registered Office and Principle Place of Business

Merck Serono Limited
Bedfont Cross, Stanwell Road
Feltham, Middlesex
TW14 8NX
United Kingdom

Phone +44(0) 20 8818 1925
Fax +44 (0) 20 8818 7267

Registered in England Number 990823

Merck Serono is a division of Merck KGaA