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Guillaume Couillard
Director, Board Secretariat, Communications and Strategic Planning
Patented Medicine Prices Review Board
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Ottawa, Ontario K1P 1C1

**Re: Notice & Comment**

Dear Mr. Couillard,

GlaxoSmithKline is pleased to respond to the PMPRB's Notice and Comment relating to the Reasonable Relationship Test Amendment and the List Price Relative to MAPP Verification Amendment.

**1. Reasonable Relationship Test (Schedule 4) Amendment**

GlaxoSmithKline would support this amendment with the following clarifications:

- What time period would be used for the N-ATP comparison?
- If a price increase is taken on the existing DIN during the applicable time period, will the N-ATP be adjusted for comparison purposes?
- What if N-ATP includes benefits and thus, is lower than the lowest of the public sources (for example, N-ATP includes free goods associated with a patient support program)? Would the PMPRB consider using the lowest of the public sources in these scenarios?

**2. List Price Relative to MAPP Verification Amendment**

GlaxoSmithKline is in favor of this amendment subject to the following questions/comments:

- The CD&H price source usually includes wholesaler mark-up fees. Will the PMPRB be making allowances for this?
- The list price decrease to re-align to MAPP at time of introductory price review should not impact the IBP.
- Will patentees be given a pre-determined amount of time to implement the list price decrease, as applicable?
- If list price is greater than MAPP, will this generate excess revenues even if N-ATP is in compliance?

GlaxoSmithKline wishes to thank the Board for the opportunity to comment on these proposals.

Sincerely,

Katherine Miles
Pricing Analyst
GlaxoSmithKline