

510k Summary

July 13, 2011

SEP 12 2011

K111178

**Trade Name:** JUELLCure Soft

**Common Name:** soft impression material

**Company Contact:**

John Roderick, Operations Manager  
Juell Dental  
2401 N. Commerce  
Ardmore, OK 73401  
(580) 798-4414

**Device Classification:** resin, denture, relining, rebasing

**Device CFR Section:** 21 CFR 872.3760

**FDA Device Class:** Class II

**FDA Product Code:** EBI

**Classification Panel:** Dental

**Device Description:** JuellCure Soft is a self-curing, silicone-based and permanently soft relining material for removable dentures.

**Indications for Use:**

JUELL Soft Cure is intended for use as a permanent soft relining for total and partial dentures

- To relieve pressure from pressure points
- To dam the palatal vibrating line
- In cases of flabby ridge and/or insufficient adhesion
- To cushion sharp-edged alveolar processes

**Testing**

The working time and setting time were determined for the Soft Cure base, catalyst, glazing base, and glazing catalyst. The surface hardness (Shor hardness A), and adhesion to dentures was determined.

**Predicate Device:** Ufi Gel SC, K974772, VOCO GmbH, Germany

K11178

**Substantial Equivalence**

The material composition of Ufi Gel SC and Juel Soft Cure are very similar. The indications for use are the same. The surface hardness, adhesion time and working time are the same.

Function	JUELL Soft Cure	Ufi Gel SC
Monomer Matrix	70 – 80 %	70 – 80 %
Rheologic Modifier	15 – 30 %	15 – 30 %
Catalyst	0,1 – 0,5 %	0,1 – 0,5 %
Monomer Matrix	70 – 80 %	70 – 80 %
Rheologic Modifier	15 – 30 %	15 – 30 %
Colorant	<0.1 %	<0.1 %
Co-Monomer	5 – 10 %	5 – 10 %

Function	JUELL Soft Cure	Ufi Gel SC
Monomer Matrix	80 – 90 %	80 – 90 %
Rheologic Modifier	10 – 20 %	10 – 20 %
Catalyst	0,1 – 0,5 %	0,1 – 0,5 %
Monomer Matrix	60 – 70 %	60 – 70 %
Rheologic Modifier	20 – 30 %	20 – 30 %
Stablizer	8 – 15 %	8 – 15 %

Function	JUELL Soft Cure	Ufi Gel SC
Monomer Matrix	70 – 85 %	70 – 85 %

K111178

<b>Rheologic Modifier</b>	15 – 20 %	15 – 20 %
<b>Stabilizer</b>	0,1 – 0,5 %	0,1 – 0,5 %
<b>Co-Monomer</b>	2 – 5 %	2 – 5 %

<b>Test Item</b>	<b>JUELL Soft Cure</b>	<b>Ufi Gel SC</b>
Surface hardness (Shore hardness A)	26.3	26.3
Adhesion to dentures	190 N	190 N
Working time	201 s	201 s

JuellCure Soft is substantially equivalent to Ufi Gel SC in regards to indications, composition, and testing results.



Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Room - WO66-G609  
Silver Spring, MD 20993-0002

Juell Dental  
C/O Ms. Angela Blackwell  
Senior Consultant  
Biologics Consulting Group  
2401 N Commerce  
Ardmore, Oklahoma 73401

SEP 12 2011

Re: K111178  
Trade/Device Name: JuellCure Soft Impression Material  
Regulation Number: 21 CFR 872.3760  
Regulation Name: Denture Relining, Repairing, or Rebasing Resin  
Regulatory Class: II  
Product Code: EBI  
Dated: August 30, 2011  
Received: September 1, 2011

Dear Ms. Blackwell:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

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Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to <http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,



Anthony D. Watson, B.S., M.S., M.B.A.  
Director

Division of Anesthesiology, General Hospital,  
Infection Control and Dental Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known): K111178

Device Name: JuellCure Soft Impression Material

Indications for Use:

**JUELLCure Soft** is indicated for use as a permanent soft relining for total and partial dentures:

- to relieve pressure from pressure points
- to dam the palatal vibrating line
- in cases of flabby ridge and/or insufficient adhesion
- to cushion sharp-edged alveolar processes

Prescription Use   x    
(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use \_\_\_\_\_  
(21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE OF  
NEEDED)

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Concurrence of CDRH, Office of Device Evaluation (ODE)

(Division Sign-Off)

Division of Anesthesiology, General Hospital  
Infection Control, Dental Devices

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