



NOV 28 2005

Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

Guidant Endovascular Solutions  
c/o Ms. Julia Anastas  
Advisor, Regulatory Affairs  
3200 Lakeside Drive  
Santa Clara, CA 95054

Re: K052165  
RX ACCUNET™ Embolic Protection System  
Regulation Number: 21 CFR 870.1250  
Regulation Name: Percutaneous Catheter  
Regulatory Class: Class II  
Product Code: NTE  
Dated: August 8, 2005  
Received: August 9, 2005

Dear Ms. Anastas:

This letter corrects our substantially equivalent letter of August 16, 2005.

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 (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.

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.

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); 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.

This letter will allow you to continue marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0120. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). 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) 443-6597 or at its Internet address <http://www.fda.gov/cdrh/dsma/dsmamain.html>

Sincerely yours,

*Bram D. Zuckerman*

*BZ* Bram D. Zuckerman, M.D.  
Director  
Division of Cardiovascular Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

K052165

Guidant Corporation

RX ACCUNET™ Embolic Protection System  
Strut "Wing" Refinement  
Special 510(k)

Indications for Use Statement

510(k) Number

(if known)

Device Name RX ACCUNET™ Embolic Protection System

Indications for Use

The RX ACCUNET™ Embolic Protection System is indicated for use as a guide wire and embolic protection system to contain and remove embolic material (thrombus/debris) while performing angioplasty and stenting procedures in carotid arteries. The diameter of the artery at the site of filter basket placement should be between 3.25 mm and 7.0 mm.

Prescription Use  X   
(Pare 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 IF NEEDED

Concurrence of CDRH, Office of Device Evaluation (ODE)

*[Signature]*  
(Division Sign-Off)

Division of Cardiovascular Devices

510(k) Number  K052165

Page 1 of 1

AUG 16 2005

K052165  
p. 1 of 2

**GUIDANT**

**510(k) SUMMARY**

The 510(k) Summary is submitted in accordance with 21 CFR Part 807, Section 807.92

**Submitter's Name:** Guidant Corporation

**Submitter's Address:** 3200 Lakeside Drive  
Santa Clara, CA 95054

**Telephone:** 408 845 2201

**Fax:** 408 845 2304

**Contact Person:** Julia Anastas

**Date Prepared:** August 8, 2005

**Device Trade Name:** RX ACCUNET Embolic Protection System

**Device Common Name:** Embolic Protection System

**Device Classification Name:** Embolic Protection System

**Device Classification:** Class II

**Summary of Substantial Equivalence:**

The RX ACCUNET™ Embolic Protection System is substantially equivalent to the RX ACCUNET™ Embolic Protection System (K042218).

**Device Description:**

The RX ACCUNET™ Embolic Protection System is a filtration type embolic protection device, filtering distal to the interventional site. The System consists of the RX ACCUNET™ Delivery System and the RX ACCUNET™ Recovery Catheter. The RX ACCUNET™ Embolic Protection System is delivered via a Delivery Sheath with a flexible tip coil that facilitates movement of the Sheath through tortuous anatomy. Once across the lesion, the Filter Basket is expanded in the arterial lumen by peeling the Delivery Sheath from the guide wire using the torque device and peel away adapter. At the conclusion of the interventional procedure, the Filter Basket is collapsed inside the Recovery Catheter. Once

collapsed, the entire system is removed as a single unit. The Recovery Catheter has a radiopaque tip to facilitate movement through tortuous anatomy

**Intended Use:**

The RX ACCUNET™ Embolic Protection System is indicated for use as a guide wire and embolic protection system to contain and remove embolic material (thrombus/debris) while performing angioplasty and stenting procedures in carotid arteries. The diameter of the artery at the site of filter basket placement should be between 3.25 mm and 7.0 mm.

**Technological Characteristics:**

The modifications incorporated into the RX ACCUNET™ Embolic Protection System consist of a minor design refinement made to the end of the strut of the RX ACCUNET™ Filter Basket and the addition of specific in-process testing on the manufacturing line. No changes were made to the RX ACCUNET™ Guide Wire, Delivery Sheath, or Recovery Catheter.

The RX ACCUNET™ Embolic Protection System is substantially equivalent to the RX ACCUNET™ Embolic Protection System (K024418) with regard to device design, principles of operation, materials, and indications for use. The following design attributes are the same or similar for both subject devices and the predicate device:

- Rapid exchange systems
- Filter based technology
- Polyurethane filter membrane
- Nitinol filter/basket component
- Compatibility with .014" guidewires
- Compatibility with 6F guide catheters
- Compatibility with the RX ACCUNET Recovery Catheter and the RX ACCUNET 2 Recovery Catheter (K042908)
- Available in 190 and/or 300 cm lengths
- Accommodates same vessel sizes
- Radiopaque guidewire tips and/or delivery sheath tips
- Radiopaque markers on filter