



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

SEP - 9 2010

Ms. Claudia Manikam
Regulatory Affairs Specialist
ELA Medical, Inc.
2905 Northwest Boulevard, Suite 40
Plymouth, MN 55441

Re: P980049 / S059
Paradym DR model 8550 and Paradym VR model 8250
P060027 / S026
Paradym CRT-D Model 8750
Filed: June 30, 2010
Procodes: LWS and NIK

Dear Ms. Manikam:

The Center for Devices and Radiological Health (CDRH) of the Food and Drug Administration (FDA) has completed its evaluation of your premarket approval application (PMA) supplement, which requested approval for revised embedded implant software (version W2.8.4) and revised Smartview programmer software (version 2.22 UG1). Based upon the information submitted, the PMA supplement is approved. You may begin commercial distribution of the device as modified by your PMA supplement in accordance with the conditions described below.

The sale and distribution of this device are restricted to prescription use in accordance with 21 CFR 801.109 and under section 515(d)(1)(B)(ii) of the Federal Food, Drug, and Cosmetic Act (the act). FDA has determined that this restriction on sale and distribution is necessary to provide reasonable assurance of the safety and effectiveness of the device. Your device is therefore a restricted device subject to the requirements in sections 502(q) and (r) of the act, in addition to the many other FDA requirements governing the manufacture, distribution, and marketing of devices.

Continued approval of this PMA is contingent upon the submission of periodic reports, required under 21 CFR 814.84, at intervals of one year (unless otherwise specified) from the date of approval of the original PMA. Two copies of this report, identified as "Annual Report" (please use this title even if the specified interval is more frequent than one year) and bearing the applicable PMA reference number, should be submitted to the address below. The Annual Report should indicate the beginning and ending date of the period covered by the report and should include the information required by 21 CFR 814.84.

In addition to the above, and in order to provide continued reasonable assurance of the safety and effectiveness of the device, the Annual Report must include, separately for each model number (if applicable), the number of devices sold and distributed during the reporting period, including those distributed to distributors. The distribution data will serve as a denominator and provide necessary context for FDA to ascertain the frequency and prevalence of adverse events, as FDA evaluates the continued safety and effectiveness of the device.

In addition, because your device is a pacemaker, implantable cardioverter-defibrillator (ICD), or system lead, FDA has determined that the following additional information is necessary to provide continued reasonable assurance of the safety and effectiveness of the device. In the Annual Report, provide the following information known by or reported to the applicant:

1. The number of pulse generators domestically implanted and the number of reported explants and deaths.
2. A breakdown of the reported deaths into pulse generators related and non-pulse generator related.
3. A breakdown of the reported explants into the number reported that were:
 - a. For pacemakers and pulse generators: at end of battery life, the number that had complications not resolvable by programming, and, as applicable, the numbers that experienced other safety and effectiveness complications as ascertained by the user, applicant, or otherwise, or
 - b. For leads: associated with mechanical failure, associated with clinical complications, and as applicable, the numbers that experienced other safety and effectiveness complications as ascertained by the user, applicant, or otherwise.
4. The number of pulse generators returned to the applicant for cause from domestic sources, with a breakdown into:
 - a. For pacemakers and pulse generators: the number currently in analysis, the number operating properly, and the number at normal battery depletion and failed (with the failure mechanisms described).
 - b. For leads: the number currently in analysis, the number operating properly, the number failed (with failure mechanisms described); broken down into groupings for full leads and partial leads.
5. A cumulative survival table for the pulse generators.

Before making any change affecting the safety or effectiveness of the device, you must submit a PMA supplement or an alternate submission (30-day notice) in accordance with 21 CFR 814.39. All PMA supplements and alternate submissions (30-day notice) must comply with the applicable requirements in 21 CFR 814.39. For more information, please refer to the FDA guidance document entitled, "Modifications to Devices Subject to Premarket Approval (PMA) - The PMA Supplement Decision-Making Process"

(www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/ucm089274.htm).

You are reminded that many FDA requirements govern the manufacture, distribution, and marketing of devices. For example, in accordance with the Medical Device Reporting (MDR) regulation, 21 CFR 803.50 and 21 CFR 803.52, you are required to report adverse events for this device. Manufacturers of medical devices, including in vitro diagnostic devices, are required to report to FDA no later than 30 calendar days after the day they receive or otherwise becomes aware of information, from any source, that reasonably suggests that one of their marketed devices:

1. May have caused or contributed to a death or serious injury; or
2. Has malfunctioned and such device or similar device marketed by the manufacturer would be likely to cause or contribute to a death or serious injury if the malfunction were to recur.

Additional information on MDR, including how, when, and where to report, is available at www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm.

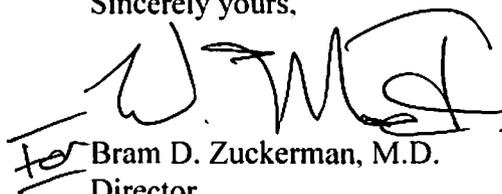
In accordance with the recall requirements specified in 21 CFR 806.10, you are required to submit a written report to FDA of any correction or removal of this device initiated by you to: (1) reduce a risk to health posed by the device; or (2) remedy a violation of the act caused by the device which may present a risk to health, with certain exceptions specified in 21 CFR 806.10(a)(2). Additional information on recalls is available at www.fda.gov/Safety/Recalls/IndustryGuidance/default.htm.

CDRH does not evaluate information related to contract liability warranties. We remind you; however, that device labeling must be truthful and not misleading.

Failure to comply with any post-approval requirement constitutes a ground for withdrawal of approval of a PMA. The introduction or delivery for introduction into interstate commerce of a device that is not in compliance with its conditions of approval is a violation of law.

If you have questions concerning this approval order, please contact [REDACTED] at [REDACTED].

Sincerely yours,



Bram D. Zuckerman, M.D.

Director

Division of Cardiovascular Devices

Office of Device Evaluation

Center for Devices and Radiological Health