

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

APR 1 - 2011

Ms. Mary Plante Principal Regulatory Affairs Specialist Cardiac Rhythm Disease Management Medtronic, Inc. 8200 Coral Sea St. NE Mounds View, MN 55112

Re: P080006/S002
Attain Ability™ Plus Model 4296 Lead
Filed: June 10, 2009
Amended: October 22, 2009, November 2, 2009, June 3, 2010, August 12, 2010, September 13, 2010 and January 13, 2011
Procode: OJX

Dear Ms. Plante:

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 the Attain Ability[™] Plus Model 4296 Lead. 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 and in the "Conditions of Approval for Cardiac Pacemakers and Programmers" (enclosed).

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). The device is further restricted under section 515(d)(1)(B)(ii) of the act insofar as the labeling must specify the specific training or experience practitioners need in order to use the device. FDA has determined that these restrictions on sale and distribution are 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.

Page 2 - Ms. Mary Plante

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 "<u>Annual Report</u>" (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 leads domestically implanted and the number of reported explants and deaths.
- 2. A breakdown of the reported deaths into leads related and non-leads 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 leads 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).

Page 3 - Ms. Mary Plante

- 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 leads.

In addition to the Annual Report requirements, you must provide the following data in postapproval study reports (PAS). Two copies, identified as "<u>PMA Post-Approval Study Report</u>" and bearing the applicable PMA reference number, should be submitted to the address below.

A nonrandomized, multi-site, world-wide study of implanted commercially available Model 4296 leads. The primary objective of the study is to evaluate the chronic performance of the Model 4296 lead. The hypothesis is to demonstrate that the Model 4296 lead-related complication-free rate is greater than 92.5% at five years post-implant. The complication free rate will be estimated based on clinical adverse events including: failure to capture, failure to sense/under-sensing, threshold rise, over-sensing, abnormal pacing impedance, lead insulation breach, lead conductor fracture, extra-cardiac stimulation, cardiac perforation, lead dislodgement, and structural lead failure. The secondary objectives are descriptive in nature and are intended to gain additional information about the Model 4296 lead. They consist of summarizing all lead related adverse events, characterizing any changes in electrode programming, characterizing fractures with and without loss of function, e.g. another conductor used, and summarizing bipolar electrical performance at 1 year. The subjects of the study are patients who are enrolled into the SLS and meet the inclusion criteria but do not meet any of the exclusion criteria. In both the 4196 and 4296 PAS protocols, the enrollment window is \leq 30 days post implant. The sample size of 4296 lead is 1,016, assuming 10% attrition per year, which is to satisfy primary objective analysis requirement and to provide reliable estimates on individual failure mode rates for the general population. An interim analysis will be conducted to test the hypothesis that the Model 4296 LV lead related complication-free survival probabilities at 2 years post implant are similar to the Model 4196 leads. If there is evidence that the chronic performance of the Model 4296 lead is not equal to or better than the Model 4196 lead, study enrollment requirements will increase to 1,778 for the Model 4296 lead. Subjects will be followed from their enrollment date, and at six month intervals through five years post-implant.

FDA would like to remind you that you are required to submit PAS Progress Reports every six months. The PAS Progress Reports should be submitted separately from the Annual Reports. Please refer to the guidance document on how to handle post-approval studies imposed by approval orders, located at the following website:

http://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/u cm070974.htm Page 4 – Ms. Mary Plante

Be advised that the failure to conduct any such study in compliance with the good clinical laboratory practices in 21 CFR part 58 (if a non-clinical study subject to part 58) or the institutional review board regulations in 21 CFR part 56 and the informed consent regulations in 21 CFR part 50 (if a clinical study involving human subjects) may be grounds for FDA withdrawal of approval of the PMA.

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.

Page 5 - Ms. Mary Plante

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.

You are reminded that, as soon as possible and before commercial distribution of your device, you must submit an amendment to this PMA submission with copies of all approved labeling in final printed form. Final printed labeling that is identical to the labeling approved in draft form will not routinely be reviewed by FDA staff when accompanied by a cover letter stating that the final printed labeling is identical to the labeling approved in draft form. If the final printed labeling is not identical, any changes from the final draft labeling should be highlighted and explained in the amendment.

All required documents should be submitted in triplicate, unless otherwise specified, to the address below and should reference the above PMA number to facilitate processing. One of those three copies may be an electronic copy (eCopy), in an electronic format that FDA can process, review and archive (general information:

http://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/HowtoMarketYourDevice/P remarketSubmissions/ucm134508.htm; clinical and statistical data:

http://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/HowtoMarketYourDevice/P remarketSubmissions/ucm136377.htm).

U.S. Food and Drug Administration Center for Devices and Radiological Health PMA Document Mail Center – WO66-G609 10903 New Hampshire Avenue Silver Spring, MD 20993-0002

If you have questions concerning this approval order, please contact (b)(5) at (301) 796-6359.

Sincerely yours,

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