

**SECTION IV****510(k) SUMMARY OF SAFETY AND EFFECTIVENESS INFORMATION**

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as required by the Safe Medical Devices Act of 1990 and codified in 21 CFR 807.92 upon which the substantial equivalence is based.

**Smith & Nephew FOOTPRINT RCX PK Suture Anchor**

Date Prepared: December 18, 2007

**A. Submitter's Name:**

Smith & Nephew, Inc., Endoscopy Division  
150 Minuteman Road  
Andover MA, 01810

**B. Company Contact**

Christina Flores  
Regulatory Affairs Specialist II  
Phone: (508) 261-3705  
FAX: (508) 261-3620

**C. Device Name**

Trade Name: FOOTPRINT RCX PK Suture Anchor  
Common Name: Suture Anchor  
Classification Name: Fastener, fixation, non-degradable, soft tissue

**D. Predicate Devices**

The Smith & Nephew FOOTPRINT RCX PK Anchor is substantially equivalent in Intended Use and Fundamental Scientific Technology to the following legally marketed device in commercial distribution: Smith & Nephew Twinfix PK FP Suture Anchor.

**E. Description of Device**

The FOOTPRINT RCX PK Suture Anchor is a suture anchor manufactured from PEEK polymer. The screw-in anchor can be loaded with up to four strands of suture and facilitates arthroscopic repair of soft tissue to bone. The design allows

the surgeon to adjust the tension on the tissue intraoperatively and secure the repair.

#### **F. Intended Use**

The Smith & Nephew FOOTPRINT RCX PK Suture Anchor is intended for use for the reattachment of soft tissue to bone for the following indications:

**Shoulder:** Rotator cuff repair, Bankart repair, Slap lesion repair, Biceps tenodesis, Acromioclavicular separation, Deltoid repair, and Capsular shift or Capsulolabral reconstruction.

**Foot/Ankle:** Lateral stabilization, Medial stabilization, Achilles tendon repair, Hallux valgus reconstruction, Mid-foot reconstruction, Metatarsal ligament repair.

**Knee:** Medial collateral ligament repair, Lateral collateral ligament repair, Patellar tendon repair, Posterior oblique ligament repair, Iliotibial band tenodesis.

**Hand/Wrist:** Scapholunate ligament reconstruction, Ulnar collateral ligament reconstruction, Radial collateral ligament reconstruction.

**Elbow:** Biceps Tendon reattachment, Ulnar or radial collateral ligament reconstruction

#### **G. Comparison of Technological Characteristics**

The Smith & Nephew FOOTPRINT RCX PK Suture Anchor is substantially equivalent in materials, fundamental scientific technology, and intended use and is as safe and effective as its currently marketed predicate device, the Smith & Nephew Twinfix PK FP (K073509).

#### **H. Summary Performance Data**

The performance testing conducted demonstrates that the insertion and fixation properties of the Smith & Nephew FOOTPRINT RCX PK suture anchor is substantially equivalent to the predicate Smith & Nephew Twinfix PK FP suture anchor, cleared via K073509. The testing also demonstrates the new device does not raise any new issues of safety and efficacy.



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

Smith & Nephew, Inc.  
% Ms. Christina Flores  
Regulatory Affairs Specialist II  
150 Minuteman Road  
Andover, Massachusetts 01810

APR - 5 2010

Re: K093935  
Trade/Device Name: Smith & Nephew FOOTPRINT RCX PK Suture Anchor  
Regulation Number: 21 CFR 888.3040  
Regulation Name: Smooth or threaded metallic bone fixation fastener  
Regulatory Class: Class II  
Product Code: MBI  
Dated: March 26, 2010  
Received: March 29, 2010

Dear Ms. Flores:

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.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such 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.

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 (240) 276-3150 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,



Mark N. Melkerson  
Director Division of Surgical, Orthopedic  
and Restorative Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

**Indications for Use**

510(k) Number (if known): K093935

Device Name: Smith & Nephew FOOTPRINT RCX PK Suture Anchor

**Indications For Use:**

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**Elbow:** Biceps Tendon reattachment, Ulnar or radial collateral ligament reconstruction.

Prescription Use   x   AND/OR Over-The-Counter Use         
(Per 21 CFR 801 Subpart D) (21 CFR 807 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE – CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

  
\_\_\_\_\_  
(Division Sign-Off)  
Division of Surgical, Orthopedic,  
and Restorative Devices

510(k) Number K093935