FERGUSON MEDICAL

NOV 20 1997

916-342-4133
FAX: 916-343-4541

27 August 1997

K972217

510(k) SUMMARY

The 510(k) summary information required by 21 CFR 807.92 is as follows:

A. Classification name: Screw, fixation, bone

Common/usual name: Screw, bone screw, etc.

Proprietary name: Orthopedic Screw System

B. Substantial equivalence: Zimmer, Herbert Bone Screw (K792022), Synthes, Synthes Reconstructive Plates "Y" Plates (K792291), Alphatec Manufacturing, Inc., Alphatec Compression Hip Screw System (K921622), Osteomed, M3 Lag Screw Fixation System (K924018), Howmedica, Fully Threaded Alta Cancellous Bone Screw (K931524), Aesculap, Titanium Alloy Bone Screws (K940207), Kinetikos Medical, Inc., K2 Bone Screw System (K960537), DePuy, Inc, DePuy Advantage Fixation Screw System (K961234), Synthes, Synthes Sterile 7.0/7.3 mm Cannulated Screws (K962011).

C. Device Description: The device is an assortment of various sizes and configurations of stainless steel bone screws.

D. Intended use: The device is intended to be

implanted for use in the fixation of long bone fractures and for long bone reconstructions.

E. Technological characteristics: The Orthopedic Screw System is a standardly used device consisting of various sizes and configurations of stainless steel bone screws.

Sincerely,
FERGUSON MEDICAL

Frank Ferguson
Official Correspondent (FDA)

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

NOV 20 1997

Mr. Frank Ferguson
Ferguson Medical
3407 Bay Avenue
Chico, California 95973

Re: K972217
Orthopedic Screw System
Regulatory Class: II
Product Code: HWC
Dated: October 10, 1997
Received: October 15, 1997

Dear Mr. Ferguson:

We have reviewed your Section 510(k) notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to 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). 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. Note that labeling or otherwise promoting a device for pedicular screw fixation/attachment would cause the device to be adulterated under 501(f)(1) of the Act. This device, if intended for use in pedicular screw fixation/attachment, would be found not substantially equivalent and would be a class III device under Section 513(f) of the Act. Class III devices are required to have an approved premarket approval (PMA) application prior to marketing. Accordingly:

1. The package insert must prominently state that the device is intended for the specific use(s) described in the enclosure only; and

2. You may not label or in any way promote this device for pedicular screw attachment to, or fixation of the cervical, thoracic or lumbar vertebral column. If this device is a screw with outer diameters of 3 mm - 10 mm and overall lengths of 10 mm - 75 mm inclusively, the package insert must include the following statement, **"WARNING:** This device is not approved for screw attachment or fixation to the posterior elements (pedicles) of the cervical, thoracic, or lumbar spine." Any pedicular screw fixation/attachment to the cervical, thoracic or lumbar vertebral column of this device is considered investigational and may only be investigated as a significant risk device in accordance with the investigational device exemption (IDE) regulations under 21 CFR, Part 812. All users of the device for pedicular screw fixation/attachment must receive approval from their respective institutional review boards (IRBs) and the Food and Drug Administration (FDA) prior to conduct of the investigation.

If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval), 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 895. A substantially equivalent determination assumes compliance with the current Good Manufacturing Practice requirement, as set forth in the Quality System Regulation (QS) for Medical Devices: General regulation (21 CFR Part 820) and that, through periodic (QS) inspections, the Food and Drug Administration (FDA) will verify such assumptions. Failure to comply with the GMP regulation may result in regulatory action. In addition, FDA may publish further announcements concerning your device in the Federal Register. Please note: this response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal Laws or Regulations.

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

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4659. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address "http://www.fda.gov/cdrh/dsmamain.html".

Sincerely yours,

Celia M. Witten, Ph.D., M.D.
Director
Division of General and
Restorative Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

510(k) Number (If known): K972217

Device Name: Orthopedic Screw System

Indications For Use:

The device is intended to be implanted for use in the fixation of long bone fractures and for long bone reconstructions.

(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 General Restorative Devices
510(k) Number K972217

Prescription Use X OR Over-The-Counter Use _____
(Per 21 CFR 801.109)