

K972445

OCT - 2 1997

## EXHIBIT 7

## RESPONSE TO SMDA OF 1990

## SUMMARY OF SAFETY AND EFFECTIVENESS DATA

Kenneth J. Berk  
80 Oakland Street  
PO Box 780  
Watertown, MA 02272-0780  
USA.

TELEPHONE: (617) 926-6666  
FAX: (617) 926-6262

DEVICE NAME: **PULPDENT OX-OUT**  
PREDICATE DEVICES: Ultradent *DeOx*  
Panavia *Oxyguard II*

DESCRIPTION AND INTENDED USE: **Pulpdent OX-OUT** is a tinted, glycerine and polyethylene glycol based gel used to block oxygen from the surface of anaerobic setting, resin-type dental restorative materials. **Pulpdent OX-OUT** prevents the formation of an oxygen inhibited layer at the margins of a restoration. It also contains a polymerization accelerant to improve setting.

**Pulpdent OX-OUT** is indicated during cementation of metal bridges, crowns and inlays/onlays, cementation of silanated porcelain and cured composite crowns or inlays/onlays, cementation of preformed or cast posts and cores, and for bonded amalgam restorations.

COMPARISON WITH PREDICATE PRODUCTS: **Pulpdent OX-OUT** is substantially equivalent in composition and intended use as the predicate products. Please see Exhibit 5 for the entire comparison.

SAFETY AND EFFECTIVENESS: Please see Exhibit 6 for the *Reality* article concerning the effectiveness of these types of products. Exhibit 6 also contains the technical sheets which detail the typical safe applications and FDA status of the two major components.



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20856

OCT - 2 1997

Mr. Kenneth J. Berk  
Pulpdent Corporation  
80 Oakland Street  
Watertown, Massachusetts 02272

Re: K972445  
Trade Name: Pulpdent Ox-Out  
Regulatory Class: II  
Product Code: EMA  
Dated: August 12, 1997  
Received: August 15, 1997

Dear Mr. Berk:

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.

If your device is classified (see above) into either class II (Special Controls) or class III (Pre-market 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

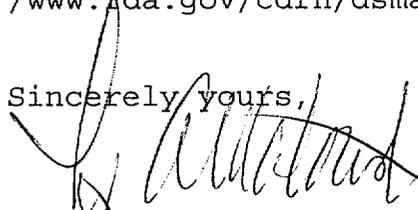
Page 2 - Mr. Berk

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. 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 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4618. 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,



Timothy A. Ulatowski  
Director  
Division of Dental, Infection Control  
and General Hospital Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

· Enclosure

510(k) Number (if known): K972445

Device Name: PULPDENT OX-OUT

Indications For Use:

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

Susan Rumer

(Division Sign-Off)  
Division of Dental, Infection Control,  
and General Hospital Devices

510(k) Number K972445

Prescription Use Yes  
(Per 21 CFR 801.109)

OR

Over-The-Counter Use No

(Optional Format 1-2-96)