



Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

FEB 26 1999

Ms. Carolyn Schmiedeknecht
Bio-Detek Incorporated
525 Narragansett Park Drive
Pawtucket, RI 02861

Re: K990106
ZOLL First Responder Padz Adult Defibrillation Electrodes
Regulatory Class: III (three)
Product Code: 74 MLN
Dated: February 12, 1999
Received: February 16, 1999

Dear Ms. Schmiedeknecht:

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 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). 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 requirements, 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.

Page 2 - Ms. Carolyn Schmiedeknecht

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) 594-4648. 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/dsma/dsmamain.html>".

Sincerely yours,



Thomas J. Callahan, Ph.D.
Director
Division of Cardiovascular,
Respiratory, and Neurological Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

2/26/99

510(k) Number (if known): K990106

Device Name: First Responder Padz Adult Defibrillation Electrodes

Indications For Use:

ZOLL **First Responder Padz** Adult Defibrillation Electrodes will be used for the following clinical applications:

- Defibrillation
- Electrocardiograph Monitoring

In conjunction with these devices:

- ZOLL PD™ 1200 Pacemaker/Defibrillator
- ZOLL PD™ 1400 Pacemaker/Defibrillator
- ZOLL PD™ 2000 Pacemaker/Defibrillator
- ZOLL D 900 Defibrillator
- ZOLL D 1400 Defibrillator
- ZOLL D 2000 Defibrillator
- ZOLL 1600 Pacemaker/Defibrillator
- ZOLL 1700 Pacemaker/Defibrillator
- ZOLL NTP 1000 Noninvasive Temporary Pacemaker
- ZOLL M Series

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Concurrence of CDRH Office of Device Evaluation (ODE)

Mark Kramer

(Division Sign-Off)
Division of Cardiovascular, Respiratory,
and Neurological Devices
510(k) Number K990106

Perscription Use
(Per 21 CFR 801.109)

OR

Over-The-Counter Use _____

(Optional Format 1-2-96)

page 1

By trained personnel, including:

- Physicians
- Nurses
- Paramedics
- Emergency Medical Technicians (EMT)
- Policemen/women
- Firemen/women

In typical settings.

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page 2