



July 9, 2018

Encore Medical, L.P.  
Teffany Hutto  
Manager, Regulatory Affairs  
9800 Metric Blvd.  
Austin, Texas 78758

Re: K180930

Trade/Device Name: EMPOWR VVC Tibial Insert

Regulation Number: 21 CFR 888.3560

Regulation Name: Knee Joint Patellofemorotibial Polymer/Metal/Polymer Semi-Constrained Cemented Prosthesis

Regulatory Class: Class II

Product Code: JWH, OIY

Dated: April 9, 2018

Received: April 10, 2018

Dear Teffany Hutto:

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. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to 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); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); 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.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 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 comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/>) and CDRH Learn (<http://www.fda.gov/Training/CDRHLearn>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<http://www.fda.gov/DICE>) for more information or contact DICE by email ([DICE@fda.hhs.gov](mailto:DICE@fda.hhs.gov)) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

**Mark N. Melkerson -S**

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

Enclosure

## Indications for Use

510(k) Number (if known)

K180930

Device Name

EMPOWR VVC Tibial Insert

Indications for Use (Describe)

Joint replacement is indicated for patients suffering from disability due to:

- degenerative, post-traumatic or rheumatoid arthritis;
- avascular necrosis of the femoral condyle;
- post-traumatic loss of joint configuration, particularly when there is patellofemoral erosion, dysfunction or prior patellectomy;
- moderate valgus, varus or flexion deformities;
- treatment of fractures that are unmanageable using other techniques.

This device may also be indicated in the salvage of previously failed surgical attempts. All devices are intended for cemented applications except for the 3DKNEE™ Porous Coated Femur, EMPOWR Porous™ Knee Femur and EMPOWR Porous™ Knee Tibia which are intended for cementless applications.

While knee replacements are not intended to withstand activity levels and loads of normal healthy bone, they are a means of restoring mobility and reducing pain for many patients.

Type of Use (Select one or both, as applicable)

Prescription Use (Part 21 CFR 801 Subpart D)

Over-The-Counter Use (21 CFR 801 Subpart C)

### CONTINUE ON A SEPARATE PAGE IF NEEDED.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

**\*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.\***

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services  
Food and Drug Administration  
Office of Chief Information Officer  
Paperwork Reduction Act (PRA) Staff  
PRAStaff@fda.hhs.gov

*“An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number.”*

## 510(k) Summary

Date: July 9, 2018

Contact Person:

Manufacturer:

DJO Surgical (Legal Name: Encore Medical, L.P.)  
9800 Metric Blvd  
Austin, TX 78758

Teffany Hutto

Manager, Regulatory Affairs

Phone: (512) 834-6255

Fax: (760) 597-3466

Email: teffany.hutto@djoglobal.com

Product	Common Name	Classification	Product Code
EMPOWR VVC Tibial Insert	Total Knee Implant	Class II	JWH, OIY

Product Code	Regulation and Classification Name
JWH	Knee joint patellofemorotibial polymer/metal/polymer semi-constrained cemented prosthesis per 21 CFR 888.3560
OIY	Knee joint patellofemorotibial polymer/metal/polymer semi-constrained cemented prosthesis per 21 CFR 888.3560

### Description:

The EMPOWR Varus / Valgus Constrained (VVC) Tibial Insert and accessory is a line extension to the EMPOWR Knee platform (cleared via K143242), to include a more constrained tibial insert component that provides additional internal / external and varus / valgus rotational stability, which provide surgeons with comprehensive surgical solutions to address a variety of patient demographics and surgeon preferences.

### Indications for Use:

Joint replacement is indicated for patients suffering from disability due to:

- degenerative, post-traumatic or rheumatoid arthritis;
- avascular necrosis of the femoral condyle;
- post-traumatic loss of joint configuration, particularly when there is patellofemoral erosion, dysfunction or prior patellectomy;
- moderate valgus, varus or flexion deformities;
- treatment of fractures that are unmanageable using other techniques.

This device may also be indicated in the salvage of previously failed surgical attempts. All devices are intended for cemented applications except for the 3DKNEE™ Porous Coated Femur, EMPOWR Porous™ Knee Femur and EMPOWR Porous™ Knee Tibia which are intended for cementless applications.

While knee replacements are not intended to withstand activity levels and loads of normal healthy bone, they are a means of restoring mobility and reducing pain for many patients.

**Predicate Devices:**

- EMPOWR PS Knee System (K160342)
- Exprt Knee System (K140830)
- Foundation Constrained Posterior Stabilized Tibial Insert (K933539)

**Reference Devices:**

- Encore Medical Acetabular System (K072154)
- Highly Cross-Linked Vitamin E UHMWPE Tibial Insert (K091956)

**Comparable Features to Predicate Device(s):**

The EMPOWR VVC Tibial Insert Implant is a line extension also includes a modified version of the EMPOWR PS Tibial Insert Implants (cleared via K160342). The sizing architecture, material (highly crosslinked UHMWPe with vitamin E per ASTM F648), minimum thickness offering (10mm), and distal locking mechanism geometry with the mating tibial baseplate remains identical to EMPOWR PS Tibial Insert Implants.

**Key Differences in Subject Device to Predicate:**

A primary difference between the EMPOWR VVC Tibial Insert compared to the EMPOWR PS Tibial Insert Implants is the proximal side of the tibial insert and post geometry was modified to configure an additional amount of internal / external and varus / valgus constraint when compared to the EMPOWR PS Tibial Insert Implants.

**Non-Clinical Testing:** Mechanical testing has demonstrated the device's ability to perform under expected conditions. This testing includes:

- Femoral – Tibial Contact Area
- Femoral – Tibial Intrinsic Stability
- VVC Post Fatigue
- Locking mechanism Static Stability and Fatigue
- Reinforcement Pin Taper Characterization
- Varus / Valgus Constraint Characterization

All testing has determined that the device is substantially equivalent to the predicate devices.

**Endotoxin Assessment:** DJO Surgical conducts device testing to assure that pyrogen limit specifications are met via the Kinetic Chromogenic method for bacterial endotoxin testing.

**Clinical Testing:** Clinical testing was not required

**Conclusions:** All testing and evaluations demonstrate that the device is substantially equivalent to the predicates identified.