



Siemens Medical Solutions USA, Inc
% Ms. Maria Ebio
Sr. Director, Regulatory Affairs
40 Liberty Blvd.
MALVERN PA 19355

June 27, 2019.

Re: K190578

Trade/Device Name: SOMATOM Force, SOMATOM Definition Flash, SOMATOM Drive,
SOMATOM Definition Edge, SOMATOM Definition AS Open, SOMATOM
Edge Plus, SOMATOM Definition AS/AS+, SOMATOM Confidence

Regulation Number: 21 CFR 892.1750

Regulation Name: Computed tomography x-ray system

Regulatory Class: Class II

Product Code: JAK

Dated: May 15, 2019

Received: May 16, 2019

Dear Ms. Ebio:

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. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm> identifies combination product submissions. 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) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; 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 <https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance>) and CDRH Learn (<https://www.fda.gov/training-and-continuing-education/cdrh-learn>). 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 (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

For

Thalia T. Mills, Ph.D.
Director
Division of Radiological Health
OHT7: Office of In Vitro Diagnostics
and Radiological Health
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)

K190578

Device Name

SOMATOM Definition AS/AS+

Indications for Use (Describe)

This computed tomography system is intended to generate and process cross-sectional images of patients by computer reconstruction of x-ray transmission data.

The images delivered by the system can be used by a trained physician as an aid in diagnosis.

The images delivered by the system can be used by trained staff as an aid in diagnosis, treatment preparation and radiation therapy planning.

This CT system can be used for low dose lung cancer screening in high risk populations.*

*As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

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)

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Paperwork Reduction Act (PRA) Staff
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Indications for Use

510(k) Number (if known)

K190578

Device Name

SOMATOM Confidence

Indications for Use (Describe)

This computed tomography system is intended to generate and process cross-sectional images of patients by computer reconstruction of x-ray transmission data.

The images delivered by the system can be used by a trained physician as an aid in diagnosis.

The images delivered by the system can be used by trained staff as an aid in diagnosis, treatment preparation and radiation therapy planning.

This CT system can be used for low dose lung cancer screening in high risk populations.*

*As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

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

Prescription Use (Part 21 CFR 801 Subpart D)

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Indications for Use

510(k) Number (if known)

K190578

Device Name

SOMATOM Definition AS Open

Indications for Use (Describe)

This computed tomography system is intended to generate and process cross-sectional images of patients by computer reconstruction of x-ray transmission data.

The images delivered by the system can be used by a trained physician as an aid in diagnosis.

The images delivered by the system can be used by trained staff as an aid in diagnosis, treatment preparation and radiation therapy planning.

This CT system can be used for low dose lung cancer screening in high risk populations.*

*As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

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)

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Indications for Use

510(k) Number (if known)

K190578

Device Name

SOMATOM Definition Edge

Indications for Use (Describe)

This computed tomography system is intended to generate and process cross-sectional images of patients by computer reconstruction of x-ray transmission data.

The images delivered by the system can be used by a trained physician as an aid in diagnosis.

The images delivered by the system can be used by trained staff as an aid in diagnosis, treatment preparation and radiation therapy planning.

This CT system can be used for low dose lung cancer screening in high risk populations.*

*As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

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)

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Indications for Use

510(k) Number (if known)

K190578

Device Name

SOMATOM Definition Flash

Indications for Use (Describe)

This computed tomography system is intended to generate and process cross-sectional images of patients by computer reconstruction of x-ray transmission data.

The images delivered by the system can be used by a trained physician as an aid in diagnosis.

The images delivered by the system can be used by trained staff as an aid in diagnosis, treatment preparation and radiation therapy planning.

This CT system can be used for low dose lung cancer screening in high risk populations.*

*As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

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

Prescription Use (Part 21 CFR 801 Subpart D)

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Indications for Use

510(k) Number (if known)

K190578

Device Name

SOMATOM Drive

Indications for Use (Describe)

This computed tomography system is intended to generate and process cross-sectional images of patients by computer reconstruction of x-ray transmission data.

The images delivered by the system can be used by a trained physician as an aid in diagnosis.

The images delivered by the system can be used by trained staff as an aid in diagnosis, treatment preparation and radiation therapy planning.

This CT system can be used for low dose lung cancer screening in high risk populations.*

*As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

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)

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Indications for Use

510(k) Number (if known)

K190578

Device Name

SOMATOM Edge Plus

Indications for Use (Describe)

This computed tomography system is intended to generate and process cross-sectional images of patients by computer reconstruction of x-ray transmission data.

The images delivered by the system can be used by a trained physician as an aid in diagnosis.

The images delivered by the system can be used by trained staff as an aid in diagnosis, treatment preparation and radiation therapy planning.

This CT system can be used for low dose lung cancer screening in high risk populations.*

*As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

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)

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Indications for Use

510(k) Number (if known)

K190578

Device Name

SOMATOM Force

Indications for Use (Describe)

This computed tomography system is intended to generate and process cross-sectional images of patients by computer reconstruction of x-ray transmission data.

The images delivered by the system can be used by a trained physician as an aid in diagnosis.

The images delivered by the system can be used by trained staff as an aid in diagnosis, treatment preparation and radiation therapy planning.

This CT system can be used for low dose lung cancer screening in high risk populations.*

*As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

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)

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510(k) SUMMARY

K190578

FOR

SOMATOM CT SCANNER SYSTEMS – SOFTWARE VERSION SOMARIS/7 syngo CT VB20

Submitted by:

Siemens Medical Solutions USA, Inc.
40 Liberty Boulevard
Malvern, PA 19355

Date Prepared: February 28, 2019

This summary of 510(k) safety and effectiveness information is being submitted in accordance with the requirements of SMDA 1990 and 21 CFR §807.92.

I. Submitter

Importer/Distributor

Siemens Medical Solutions USA, Inc.
40 Liberty Boulevard
Malvern, PA 19355

Establishment Registration Number

2240869

Location of Manufacturing Site (1)

Siemens Healthcare GmbH
Siemensstr. 1
D-91301 Forchheim, Germany

Establishment Registration Number

3004977335

Location of Manufacturing Site (2)

SIEMENS SHANGHAI, MEDICAL EQUIPMENT LTD
278 Zhou Zhu Rd
Shanghai, CHINA, 201318

Establishment Registration Number:

3003202425

Contact Person:

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Regulatory Affairs Specialist
Siemens Medical Solutions USA, Inc.
40 Liberty Boulevard
Malvern, PA 19355

Phone: (610) 448-6477
Fax: (610) 640-4481

Email: kimberly.mangum@siemens.com

II. Device Name and Classification

Product Name:	SOMATOM Force
Trade Name:	SOMATOM Force
Classification Name:	Computed Tomography X-ray System
Classification Panel:	Radiology
Regulation Number:	21 CFR §892.1750
Device Class:	Class II
Product Code:	JAK

Product Name: SOMATOM Definition Flash
Trade Name: SOMATOM Definition Flash
Classification Name: Computed Tomography X-ray System
Classification Panel: Radiology
Regulation Number: 21 CFR §892.1750
Device Class: Class II
Product Code: JAK

Product Name: SOMATOM Drive
Trade Name: SOMATOM Drive
Classification Name: Computed Tomography X-ray System
Classification Panel: Radiology
Regulation Number: 21 CFR §892.1750
Device Class: Class II
Product Code: JAK

Product Name: SOMATOM Definition Edge
Trade Name: SOMATOM Definition Edge
Classification Name: Computed Tomography X-ray System
Classification Panel: Radiology
Regulation Number: 21 CFR §892.1750
Device Class: Class II
Product Code: JAK

Product Name: SOMATOM Definition AS/AS+
Trade Name: SOMATOM Definition AS/AS+
Classification Name: Computed Tomography X-ray System
Classification Panel: Radiology
Regulation Number: 21 CFR §892.1750
Device Class: Class II
Product Code: JAK

Product Name: SOMATOM Definition AS Open
Trade Name: SOMATOM Definition AS Open
Classification Name: Computed Tomography X-ray System
Classification Panel: Radiology
Regulation Number: 21 CFR §892.1750
Device Class: Class II
Product Code: JAK

Product Name: SOMATOM Confidence
Trade Name: SOMATOM Confidence
Classification Name: Computed Tomography X-ray System
Classification Panel: Radiology
Regulation Number: 21 CFR §892.1750
Device Class: Class II
Product Code: JAK

Product Name: SOMATOM Edge Plus
Trade Name: SOMATOM Edge Plus
Classification Name: Computed Tomography X-ray System
Classification Panel: Radiology
Regulation Number: 21 CFR §892.1750
Device Class: Class II
Product Code: JAK

III. Predicate Device

Primary Predicate Device:

Trade Name: SOMATOM CT Scanner Systems
510(k) Number: K173630
Clearance Date: March 30, 2018
Classification Name: Computed Tomography X-ray System
Classification Panel: Radiology
Regulation Number: 21 CFR §892.1750
Device Class: Class II
Product Code: JAK
Recall Information: All predicate device recalls have been considered in the subject device design.

Predicate Device:

Trade Name: SOMATOM Edge Plus
510(k) Number: K173607
Clearance Date: March 21, 2018
Classification Name: Computed Tomography X-ray System
Classification Panel: Radiology
Regulation Number: 21 CFR §892.1750
Device Class: Class II
Product Code: JAK
Recall Information: There are currently no recalls for this device

IV. Device Description

Siemens intends to market a new software version, SOMARIS/7 syngo CT VB20 for the following SOMATOM Computed Tomography (CT) Scanner Systems:

Dual Source CT Systems:

- SOMATOM Force
- SOMATOM Drive
- SOMATOM Definition Flash

Single Source CT Systems:

- SOMATOM Definition AS/AS+
- SOMATOM Definition AS Open
- SOMATOM Definition Edge
- SOMATOM Confidence
- SOMATOM Edge Plus

The subject device SOMATOM CT Scanner Systems with SOMARIS/7 syngo CT VB20 are Computed Tomography X-ray Systems which feature one (single source) or two (dual source) continuously rotating tube-detector system and function according to the fan beam principle. The SOMATOM CT Scanner Systems with Software SOMARIS/7 syngo CT VB20 produces CT images in DICOM format, which can be used by trained staff for post-processing applications commercially distributed by Siemens Healthcare and other vendors as an aid in diagnosis, treatment preparation and therapy planning support (including, but not limited to, Brachytherapy, Particle including Proton Therapy, External Beam Radiation Therapy, Surgery). The computer system delivered with the CT scanner is able to run optional post processing applications.

The platform software for the SOMATOM CT Scanner Systems, SOMARIS/7 syngo CT VB20, is a command-based program used for patient management, data management, X-ray scan control, image reconstruction, and image archive/evaluation. The subject devices with software version SOMARIS/7 syngo CT VB20 will support the following modifications in comparison with the predicate devices:

1) New/Modified Hardware

- Table 1: Overview of Hardware modifications supported by software SOMARIS/7 syngo CT VB20

2) Software version SOMARIS/7 syngo CT VB20

- Table 2: Overview Software modifications of **Single Source CT System Scanner** with syngo CT VB20
- Table 3: Overview Software modifications of **Dual Source CT System Scanner** with syngo CT VB20

3) Update 510(k) Information

- Provided as Appendix H

Table 1: Hardware Modifications Supported by software SOMARIS/7 syngo VB20

#	SOMATOM CT System Scanner with SOMARIS/7 syngo CT VB20 hardware properties	Subject Devices (Single Source Systems)		Subject Devices (Dual Source Systems)	
		<ul style="list-style-type: none"> • SOMATOM Definition AS/AS+; • SOMATOM Definition AS Open; 	<ul style="list-style-type: none"> • SOMATOM Definition Edge • SOMATOM Confidence • SOMATOM Edge Plus 	<ul style="list-style-type: none"> • SOMATOM Force • SOMATOM Definition Flash 	SOMATOM Drive
1	Stellar Detector (HW)	Unmodified	Modified	Unmodified	Modified

Table 2: Overview Software Modifications of Single Source CT System Scanner with syngo CT VB20

#	SOMATOM CT System Scanner with SOMARIS/7 syngo CT VB20 property	Single Source Subject Devices		
		<ul style="list-style-type: none"> • SOMATOM Definition AS/AS+; • SOMATOM Definition AS Open 	SOMATOM Definition Edge	<ul style="list-style-type: none"> • SOMATOM Confidence; • SOMATOM Edge Plus
1	Enhanced FAST DE Results	Modified	Modified	Modified
2	Precision Matrix	N/A	N/A	N/A
3	DirectBreathhold™	New	New	New
4	IT Hardening	Modified	Modified	Modified
5	HD FoV (modification 4.0)	Modified	Modified	Modified
6	Extended i-Control Function	Enabled	Enabled	Enabled
7	Respiratory Scan Post-processing	Modified	Modified	Modified
8	Data Role Settings	Enabled	Enabled	Enabled
9	Stellar Detector (Firmware)	N/A	Modified	Modified
10	DirectDensity™ (showing relative mass density)	Modified	Modified	Modified
11	FAST 3D Camera	N/A	N/A	Modified
12	Support of Additional Dual Spiral Dual Energy Protocols	New	New	New
13	Modified User Interface Display	Modified	Modified	Modified

Table 3: Overview Software modifications of Dual Source CT System Scanner with syngo CT VB20

#	SOMATOM CT System Scanner with SOMARIS/7 syngo CT VB20 property	Subject Devices (Dual Source)		
		SOMATOM Force	SOMATOM Drive	SOMATOM Definition Flash
1	Enhanced FAST DE Results	Modified	Modified	Modified
2	Precision Matrix	Modified	N/A	N/A
3	DirectBreathhold™	N/A	New	New
4	IT Hardening	Modified	Modified	Modified
5	HD FoV (modification 4.0)	Unmodified	Modified	Modified
6	Extended i-Control Function	Enabled	Enabled	Enabled
7	Respiratory Scan Post-processing	N/A	Modified	Modified
8	Data Role Settings	Enabled	Enabled	Enabled
9	Stellar Detector (Firmware)	N/A	Modified	N/A
10	DirectDensity™ (showing relative mass density)	Modified	Modified	Modified
11	FAST 3D Camera	Modified	Modified	N/A
12	Support of Additional Dual Spiral Dual Energy Protocols	N/A	N/A	N/A
13	Modified User Interface Display	Modified	Modified	Modified

A comparison of these modifications with respect to the predicate devices is provided the “**Comparison of Technological Characteristics with the Predicate Device**” section below. Software version SOMARIS/7 syngo CT VB20 will be offered as an optional upgrade for the applicable existing SOMATOM CT Systems.

V. Indications for Use

This computed tomography system is intended to generate and process cross-sectional images of patients by computer reconstruction of x-ray transmission data.

The images delivered by the system can be used by a trained physician as an aid in diagnosis.

The images delivered by the system can be used by trained staff as an aid in diagnosis, treatment preparation and radiation therapy planning.

This CT system can be used for low dose lung cancer screening in high risk populations.*

*As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

VI. Comparison of Technological Characteristics with the Predicate Device

The SOMATOM CT Scanner Systems with VB20 Software provide the same technological characteristics in terms of materials, energy source, and control mechanisms when compared to the predicate devices. The software features of these scanners have been modified or improved in comparison to the predicate devices to support enhanced device functionality compared to the predicate devices. The hardware components of the subject devices have been modified to support a modified Stellar Technology detector.

Software version SOMARIS/7 syngo CT VB20 supports software features that are designed as Software Platform update including all new and modified features. The applicable features are depending on the SOMATOM CT Scanner Systems technological characteristics and are provided as optional features for updating the installed base and are designed features for the subject devices: SOMATOM Force, SOMATOM Definition Flash, SOMATOM Drive, SOMATOM Definition Edge, SOMATOM Definition AS/AS+, SOMATOM AS Open, SOMATOM Confidence, SOMATOM Edge Plus which supporting the technological characteristics as Hardware precondition for its intended software usage.

The intended use and fundamental scientific technology for the SOMATOM Force, SOMATOM Definition Flash, SOMATOM Drive, SOMATOM Definition Edge, SOMATOM Definition AS/AS+, SOMATOM AS Open, SOMATOM Confidence, SOMATOM Edge Plus remains unchanged from the predicate devices.

At a high level, the subject and predicate devices are based on the following same technological elements:

- Scanner Principle- Whole body X-Ray Computed Tomography Scanner
- System Acquisition – Continuously rotating tube detector system
- Iterative Reconstruction – Support of various iterative reconstruction methods
- Workplaces – Support of workplaces that include reconstruction and image evaluation software
- Patient table
- Patient table foot switch for movement
- Tin filtration technology
- Stellar detector technology

The following technological differences exist between the subject device and predicate devices:

- Software version SOMARIS/7 syngo CT VB20
- Support of additional cybersecurity features
- Precision Matrix function
- Respiratory Scan – Functions
- i-Control Functions
- DirectDensity™ (showing relative mass density)

A tabular summary of the **unmodified** subject and predicate device comparable hardware properties is provided in **Table 4** and **Table 5** below:

Table 4: Unmodified hardware properties valid for the subject device and predicate device

Hardware Property	Subject and Predicate Device (Single Source Systems)				
	SOMATOM Edge Plus	SOMATOM Definition Edge	SOMATOM Definition AS/AS+	SOMATOM Confidence	SOMATOM Definition AS Open
Scan mode	single source, dual energy				
High voltage generator	100kW				80kW
Detector	38.4mm (128 slice conf.)		19.2mm (20/40/64 slice conf.) 38.4mm (128 slice conf.)	19.2mm	
Detector Performance Technologie	Stellar				
Tube	STRATON MX Sigma	STRATON MX P			
kV Steps	70kV,80kV,100kV, 120kV, 140kV				

Table 5: Unmodified hardware properties valid for the subject device and predicate device

Hardware Property	Subject and Predicate Device (Dual Source Systems)		
	SOMATOM Force	SOMATOM Definition Flash	SOMATOM Drive
Scan mode	single source, dual source, dual energy		
High voltage generator	120kW/120kW	100kW/100kW	
Detector	2 x 57.6mm	2 x 38.4mm	
Detector Performance Technologie	Stellar		
Tube	Vectron	STRATON MX P	STRATON MX Sigma
kV Steps	70kV, 80kV, 90kV, 100kV, 110 kV, 120 kV, 130 kV, 140 kV, 150 kV	70kV, 80kV, 100kV, 120kV, 140kV	70kV, 80kV, 90kV, 100kV, 110kV, 120kV, 130kV, 140kV

The tabular summary of the **software and hardware differences** between the subject devices with software version SOMARIS/7 syngo CT VB20 and the predicate devices are listed in **Table 6 - Table 7** below (in gray shaded sections).

Table 6: Device Hardware Comparison for Subject (Single Source and Dual Source CT System Scanner) and Predicate Devices

#	hardware properties	Subject Devices (syngo CT VB20)		Predicate Device (K173630 / K173607)
		Dual Source: • SOMATOM Force, • SOMATOM Definition Flash Single Source • SOMATOM Definition AS/AS+ • SOMATOM Definition AS Open	Dual Source: • SOMATOM Drive Single Source: • SOMATOM Definition Edge, • SOMATOM Confidence • SOMATOM Edge Plus	• Siemens SOMATOM CT Scanner System • SOMATOM Edge Plus
1	Stellar Detector (HW)	Stellar Detector based on Sillian classic technologie supported	Stellar Detector based on Sillian M technologie supported	Stellar Detector based on Sillian classic technologie supported

Table 7: Software Comparison for Subject Devices (Single Source and Dual Source CT Scanner System) and Predicate Devices

	Subject Device	Predicate Device
Properties software	Dual Source: <ul style="list-style-type: none"> SOMATOM Force, SOMATOM Drive, SOMATOM Definition Flash Single Source: <ul style="list-style-type: none"> SOMATOM Definition Edge, SOMATOM Definition AS/AS+, SOMATOM Definition AS Open, SOMATOM Confidence SOMATOM Edge Plus 	<ul style="list-style-type: none"> Siemens SOMATOM CT Scanner System (K173630) SOMATOM Edge Plus (K173607)
	(syngo CT VB20)	(K173630 / K173607)
Operating System	Windows based SOMARIS/7 syngo CT VB20	Windows based SOMARIS/7 syngo CT VB10A
Acquisition Workplace	syngo Acquisition Workplace (AWP)	syngo Acquisition Workplace (AWP)
	optional 2 nd console syngo RRWP	optional 2 nd console syngo RRWP
	syngo Viewing, syngo Filming and syngo Archiving & Networking	syngo Viewing, syngo Filming and syngo Archiving & Networking
	Image Reconstruction	Image Reconstruction
Stellar Detector	Stellar detector firmware supported for subject device stellar detector re-design (no redesign for SOMATOM Force, Definition Flash and Definition AS Systems)	Stellar detector firmware supported for predicate device stellar detector design
Teampay	Support teampay Protocols	Support teampay Protocols
Protocols (Single Source CT Scanner Systems)	Support of : <ul style="list-style-type: none"> Dual Spiral Dual Energy Protocols Protocols for Radiation Therapy Planning Dual Spiral Dual Energy Protocols for radiation therapy planning Protocols that allow triggering of breath hold scanning from external device. 	Support of : <ul style="list-style-type: none"> Dual Spiral Dual Energy Protocols Protocols for Radiation Therapy Planning
Protocols (Dual Source CT Scanner Systems)	Support of : <ul style="list-style-type: none"> Protocols for Radiation Therapy Planning Protocols that allow triggering of breath hold scanning from external device. 	Support of : <ul style="list-style-type: none"> Protocols for Radiation Therapy Planning
Cybersecurity	IT Hardening (improved)	IT Hardening
HD FoV	HD FoV (modification 4.0)	HD FoV 3.0
Option for Patient Instructions.	Support Automatic Patient Instruction (API) Interface.	Support Automatic Patient Instruction (API) Interface.
FAST CARE	FAST, CARE Features supported	FAST, CARE Features supported
FAST DE Results	FAST DE Results with enhanced dialog box for individual image post-processing parameter settings and labeling	FAST DE Results
FAST Integrated Workflow*	FAST Integrated Workflow steps supported: <ul style="list-style-type: none"> FAST Isocentering FAST Range FAST Direction *(full workflow only in combination with FAST 3D Camera)	FAST Integrated Workflow steps supported: <ul style="list-style-type: none"> FAST Isocentering FAST Range FAST Direction *(full workflow only in combination with FAST 3D Camera)
FAST 3D Camera	FAST 3D Camera supported which provides more accurate proposals for	FAST 3D Camera supported which provides proposals for patient positioning and patient outline.

	<i>Subject Device</i>	<i>Predicate Device</i>
<i>Properties software</i>	Dual Source: <ul style="list-style-type: none"> SOMATOM Force, SOMATOM Drive, SOMATOM Definition Flash Single Source: <ul style="list-style-type: none"> SOMATOM Definition Edge, SOMATOM Definition AS/AS+, SOMATOM Definition AS Open, SOMATOM Confidence SOMATOM Edge Plus 	<ul style="list-style-type: none"> Siemens SOMATOM CT Scanner System (K173630) SOMATOM Edge Plus (K173607)
	(syngo CT VB20)	(K173630 / K173607)
	patient positioning and patient outline.	
DirectDensity™	DirectDensity™ (including electron density and mass density)	DirectDensity™ (including electron density)
Respiratory Scan Post-Processing	Respiratory Scan Post-Processing Including automated transfer of t-MaxIP & t-MinIP series to DICOM node.	Respiratory Scan Post-Processing Manual function for transferring t-MaxIP & t-MinIP series to DICOM node.
Precision Matrix (SOMATOM Force only)	Precision Matrix resolution support image matrix sizes of 768x768 pixels and 1024x1024 pixel (auto mode supported)	Matrix resolution 512x512 (auto mode not supported)
breath-hold technique	DirectBreathhold™ (automated trigger supported) (not for SOMATOM Force)	Respiratory Motion Management support breath hold triggered spiral scans with manual breath hold triggered examinations.
Extended i-Control Function	i-Control Function (IVM support all key function's)	i-Control Function of 1 st (limited IVM key functions set)
Software	Support Auto Tasking card UI - with interactive settings of syngo.via Data Role	Support Auto Tasking card UI - showing selected syngo.via Data Role
User Interface	<ul style="list-style-type: none"> Software Update: Smart Remote Service (SRS) or Anytime Software energy saving techniques in UI supported improved user doc 	<ul style="list-style-type: none"> Software Update: Smart Remote Service (SRS) limited energy saving techniques
Iterative Reconstruction Methods	<ul style="list-style-type: none"> ADMIRE SAFIRE iMAR 	<ul style="list-style-type: none"> ADMIRE SAFIRE iMAR

Any differences in technological characteristics do not raise different questions of safety and effectiveness. Siemens believes that the subject device is substantially equivalent to the predicate devices. Testing and validation is completed. Test results show that the subject devices, the SOMATOM CT Scanner Systems, are comparable to the predicate devices in terms of technological characteristics and safety and effectiveness and therefore are substantially equivalent to the predicate devices.

VII. Performance Data

Non Clinical Testing

Non-clinical test (integration and functional) including phantom tests were conducted for the SOMATOM CT Scanner Systems during product development. The modifications described in this Premarket Notification were supported with verification and validation testing.

Electrical Safety and Electromagnetic Compatibility (EMC) testing were conducted on the SOMATOM CT Scanner Systems in accordance with the following standards: 60601-2-44, and 60601-1-2. A list of recognized and general consensus standards considered for the subject devices is provided as **Table 8** and **Table 9** below.

Table 8: Recognized Consensus Standards				
Date of Recognition	Recognition Number	Standard Developing Organization	Standard Designation Number and Date	Title of Standard
06/27/2016	12-300	NEMA	PS 3.1 - 3.20 (2016)	Digital Imaging And Communications In Medicine (DICOM) Set
03/14/2011	12-225	NEMA	XR-25	Computed Tomography Dose Check
01/27/2015	12-287	NEMA	XR-28 2013	Supplemental Requirements For User Information And System Function Related To Dose In CT
6/27/2016	5-40	ANSI AAMI ISO	14971:2007/(R)2010 (Corrected 4 October 2007)	Medical Devices - Applications Of Risk Management To Medical Devices
		ISO	14971 Second Edition 2007-03-01	Medical Devices - Applications Of Risk Management To Medical Devices
01/14/2019	13-79	IEC	62304 Edition 1.1 2015-06 CONSOLIDATED VERSION	Medical Device Software - Software Life Cycle Processes
07/09/2014	19-4	ANSI AAMI	ES60601-1:2005/(R)2012 And A1:2012,	C1:2009/(R)2012 And A2:2010/(R)2012 (Consolidated Text) Medical Electrical Equipment - Part 1: General Requirements For Basic Safety And Essential Performance (IEC 60601-1:2005, MOD)
09/17/2018	19-8	ANSI AAMI IEC	60601-1-2:2014	Medical Electrical Equipment -- Part 1-2: General Requirements For Basic Safety And Essential Performance -- Collateral Standard: Electromagnetic Disturbances -- Requirements And Tests* *Existing SOMATOM Definition Flash systems conform to ANSI AAMI IEC 60601-1-2:2007. SOMATOM Definition Flash is no longer being manufactured or being delivered ex-factory. Software version SOMARIS/7 syngo CT VB20 supports updates of legacy SOMATOM Definition Flash scanner systems.
7212/23/2016	5-114	ANSI AAMI IEC	62366-1:2015	Medical Devices - Part 1: Application Of Usability Engineering To Medical Devices
07/09/2014	12-273	IEC	60825-1 Edition 2.0 2007-03	Safety Of Laser Products - Part 1: Equipment Classification, And Requirements [Including: Technical Corrigendum 1 (2008), Interpretation Sheet 1 (2007), Interpretation Sheet 2 (2007)]
06/27/2016	12-302	IEC	60601-2-44 Edition 3.2: 2016	Medical Electrical Equipment - Part 2-44: Particular Requirements For The Basic Safety And Essential Performance Of X-Ray Equipment For Computed Tomography
01/14/2014	12-269	IEC	60601-1-3 Edition 2.1 2013-04	Medical Electrical Equipment - Part 1-3: General Requirements For Basic Safety And Essential Performance - Collateral Standard: Radiation Protection In Diagnostic X-Ray Equipment
06/27/2016	5-89	IEC	60601-1-6 Edition 3.1 2013-10	Medical Electrical Equipment - Part 1-6: General Requirements For Basic Safety And Essential Performance - Collateral Standard: Usability
03/14/2011	12-226	IEC	61223-2-6 Second Edition 2006-11	Evaluation And Routine Testing In Medical Imaging Departments - Part 2-6: Constancy Tests - Imaging Performance Of Computed Tomography X-Ray Equipment
01/30/2014	12-270	IEC	61223-3-5 First Edition 2004-08	Evaluation And Routine Testing In Medical Imaging Departments - Part 3-5: Acceptance Tests

Date of Recognition	Recognition Number	Standard Developing Organization	Standard Designation Number and Date	Title of Standard
				- Imaging Performance Of Computed Tomography X-Ray Equipment [Including: Technical Corrigendum 1 (2006)]
06/07/2018	12-309	IEC	60601-2-28 Edition 3.0 2017-06	Medical Electrical Equipment - Part 2-28: Particular Requirements For The Basic Safety And Essential Performance Of X-Ray Tube Assemblies For Medical Diagnosis
06/27/2016	12-299	IEC	62563-1 Edition 1.1	Medical Electrical Equipment - Medical Image Display Systems - Part 1: Evaluation Methods

Standard Developing Organization	Standard Designation Number and Date	Title of Standard	How was Standard Used
IEC	60601-1-2:2007*	Medical Electrical Equipment -- Part 1-2: General Requirements For Basic Safety And Essential Performance -- Collateral Standard: Electromagnetic Disturbances – Requirements And Tests	This standard in not applicable for new Siemens CT scanners delivered ex-factory. * Existing SOMATOM Definition Flash systems are conform to ANSI AAMI IEC 60601-1-2:2007. SOMATOM Definition Flash is no longer being manufactured or being delivered ex-factory. Software version SOMARIS/7 syngo CT VB20 supports updates of legacy SOMATOM Definition Flash scanner systems.
IEC	60601-1:2005+A1:2012	Medical electrical equipment - part 1: general requirements for basic safety and essential performance	Covered by ANSI AAMI ES60601-1:2005/(R)2012 and A1:2012 as part of EMC testing.
IEC/ISO	17050-1	Conformity Assessment – Supplier’s declaration of conformity – Part 1: General requirements	Declaration of conformance to FDA recognized consensus standards.
IEC/ISO	17050-2	Conformity assessment – Supplier’s declaration of conformity – Part 2: Supporting documentation.	General consensus standards not currently recognized by FDA.

A list of applicable guidance documents considered for this submission is provided as **Table 10** below.

Table 10: FDA Guidance Documents

FDA Guidance Document and Effective Date	
1.	Guidance for Industry and FDA Staff – User Fees and Refunds for Premarket Notification Submissions 510(k) Document issued on October 2, 2017
2.	Guidance for Industry and Food and Drug Administration Staff: Refuse to Accept Policy for 510(k)s Document issued on February 21, 2019
3.	Guidance for Industry and FDA Staff: Format for Traditional and Abbreviated 510(k)s - Guidance for Industry and FDA Staff Document issued on August 12, 2005
4.	Guidance for Industry and FDA Staff: Deciding when to submit a 510(k) for a change to an existing device. Document issued on October 25, 2017
5.	Guidance for Industry and Food and Drug Administration Staff: The 510(k) Program: Evaluating Substantial Equivalence in Premarket Notifications [510(k)] Document Issued on July 28, 2014

FDA Guidance Document and Effective Date	
6.	Guidance for Industry and FDA Staff: Guidance for the Content of Premarket Submission for Software in Medical Devices Document issued on May 11, 2005
7.	Guidance for Industry and FDA Staff: Guidance for Off-The-Shelf Software Use in Medical Devices Document issued on September 9, 1999
8.	Guidance for Industry and FDA Staff: Applying Human Factors and Usability Engineering to Medical Devices. Document issued February 3, 2016
9.	Guidance for Industry and FDA Staff: Pediatric Information for X-ray Imaging Device Premarket Notifications. Document issued on November 28, 2017
10.	Guidance for Industry and FDA Staff: Content of Premarket Submissions for Management of Cybersecurity in Medical devices. Document issued on October 2, 2014
11.	Guidance for Industry and FDA Staff: Information to Support a Claim of Electromagnetic Compatibility (EMC) of Electrically-Powered Medical Devices Document issued on July 11, 2016
12.	Guidance for Industry and Food Drug Administration Staff: Design considerations and Pre-Market Submission recommendations for Interoperable Medical devices Document Issued on September 6, 2017
13.	Guidance for Industry and Food Drug Administration Staff: Appropriate Use of Voluntary Consensus Standards in Premarket Submissions for Medical Devices Document issued on September 14, 2018

Verification and Validation

Software Documentation for a Moderate Level of Concern software per FDA’s Guidance Document “Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices” issued on May 11, 2005 is also included as part of this submission. The performance data demonstrates continued conformance with special controls for medical devices containing software. The Risk Analysis was completed and risk control implemented to mitigate identified hazards. The testing supports that all software specifications have met the acceptance criteria. Testing for verification and validation support the claims of substantial equivalence.

Siemens conforms to the Cybersecurity requirements by implementing a process of preventing unauthorized access, modifications, misuse or denial of use, or the unauthorized use of information that is stored, accessed, or transferred from a medical device to an external recipient. Cybersecurity information in accordance with guidance document “Content of Premarket Submissions for Management of Cybersecurity Medical Devices issues on October 2, 2014” is included within this submission.

Summary

The features described in this premarket notification are supported with verification and validation testing, dosimetry and imaging performance, and analysis of phantom images to assess device and feature performance during product development. The risk analysis was completed and risk control implemented to mitigate identified hazards. The test results show that all of the software specifications have met the acceptance criteria. Verification and validation testing of the device was found acceptable to support the claim of substantial equivalence.

General Safety and Effectiveness Concerns

The device labeling contains instructions for use as well as necessary cautions and warnings to provide for safe and effective use of the device. Risk management is ensured via a system related Risk analysis, which is used to identify potential hazards. These potential hazards are controlled during development, verification and validation testing according to the Risk Management process. In order to minimize electrical, mechanical, and radiation hazards, Siemens adheres to recognized and established industry practice and standards.

VIII. Conclusions

The predicate devices were cleared based on the results of non-clinical testing including verification and validation, phantom tests, and supportive literature. The subject device is also tested using the same methods as used for the predicate devices. The non-clinical data supports the safety of the device and the hardware and software verification and validation demonstrates that the subject device SOMATOM CT Scanner Systems

should perform as intended in the specified use conditions. The data included in this submission demonstrates that the SOMATOM CT Scanner Systems perform comparably to the predicate devices currently marketed for the same intended use. Since all predicate devices were tested using the same methods, Siemens believes that the data generated from the SOMATOM CT Scanner Systems testing supports a finding of substantial equivalence.