

## Premarket Notification for Herniamesh T-Sling

Summary of Safety and Effectiveness

The Herniamesh T-Sling is substantially equivalent to the TVT (Tension-free Vaginal Tape) currently marketed by Ethicon Inc. and the BioSling™ - Bioabsorbable Polymer Sling & Surgical Mesh currently marketed by Prosurge Inc. / Injectx Inc. The 510 (k) "Substantial Equivalence" Decision-Making Process (detailed) decision tree was utilized to make a determination of substantial equivalence (see Exhibit 1). The answers to the following questions lead to a determination of substantial equivalence.

1. Does the new device have the same indication statement?

Yes, the Herniamesh T-Sling has the same intended use as the legally marketed predicate devices listed above. All are pubourethral slings for the treatment of stress urinary incontinence (SUI) resulting from urethral hypermobility and/or intrinsic sphincter deficiency. Therefore, the Herniamesh T-Sling has the same intended use as the predicate devices and is considered to be "substantially equivalent."

2. Does the new device have same technological characteristics, e.g. design, materials, indication etc?

No, the Herniamesh T-Sling has different technological characteristics. However, the technological differences meet or exceed the functional requirements of surgical meshes compared to the predicate devices. Please refer to Table of Similarities and Differences / Substantial Equivalence to Predicate Devices.

3. Could the new technological characteristics affect safety and effectiveness?

Yes, the new technological characteristics could affect safety and effectiveness. The differences in safety and effectiveness meet or exceed the requirements of surgical meshes compared to predicate devices.

4. Do the new characteristics raise new types of safety or effectiveness questions?

No, the safety and effectiveness questions are not new and include issues such as materials, pore size, tensile strength, suture retention, and biocompatibility. Sufficient data has been provided in this premarket notification to address any new safety and efficacy questions. Additionally, there are a variety of other meshes currently on the market with different characteristics compared to the Herniamesh T-Sling or the predicate devices.

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Summary of Safety and Effectiveness (continued)

5. Do accepted scientific methods exist for assessing the effects of the new characteristics?

Yes. The effects of the new characteristics of the Herniamesh T-Sling can be assessed by common methods utilized for surgical meshes. These include mechanical testing, scanning electron microscopy, biocompatibility and in vivo safety and effectiveness testing.

6. Are performance data available to assess the effects of the new characteristics?

Yes. These tests include mechanical testing, scanning electron microscopy, biocompatibility testing and in vivo testing.

7. Do performance data demonstrate equivalence?

Yes. The physical and mechanical characteristics of the Herniamesh T-Sling meet or exceed those of the predicate devices. Please refer to Table of Similarities and Differences / Substantial Equivalence to Predicate Devices.

Based on this information the Herniamesh T-Sling is determined to be substantially equivalent to the predicate devices.

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**Table of Similarities and Differences / Substantial Equivalence to Predicate Devices**  
(Continued)

<b>Feature</b>	<b>Herniamesh T-Sling</b>	<b>Ethicon TVT</b>	<b>Injectx Inc BioSling™</b>
<b>Burst Strength</b>	28.4 (10 <sup>2</sup> Kpa)	55 ± 3 (10 <sup>2</sup> Kpa)	Substantially Equivalent
<b>Suture Retention (N)</b>	warp 43 weft 55 45° 52	warp 52 ± 9 weft 51 ± 7 45° 57 ± 3	Substantially Equivalent
<b>Pore Size</b>	797.4μ & 228.3μ Porosity 62.4%	Substantially Equivalent Porosity 87%	Substantially Equivalent
<b>Tensile Strength</b>	warp 31.1 weft 33.1 45° 29.7	warp 23 ± 6 weft 15 ± 5 45° 14 ± 5	Substantially Equivalent
<b>Tissue Ingrowth</b>	Complete tissue incorporation of implant	Complete tissue incorporation of implant	Not Tested

Note: Values for Prolene TVT were taken from the textbook: Prostheses and Abdominal Wall Hernias by Dr. Robert Bendavid (pages 197,200)

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**Table of Similarities and Differences / Substantial Equivalence to Predicate Devices**

<b>Feature</b>	<b>Herniamesh T-Sling</b>	<b>Ethicon TVT</b>	<b>Injectx Inc BioSling™</b>
<b>510(k) No.</b>	To be determined	K974098	K010533
<b>Classification</b>	Class II: Polymeric Surgical Mesh	Class II: Polymeric Surgical Mesh	Class II: Polymeric Surgical Mesh
<b>Indication</b>	Pubourethral sling for treatment of stress urinary incontinence (SUI) resulting from urethral hypermobility and/or intrinsic sphincter deficiency	Pubourethral sling for treatment of stress urinary incontinence (SUI) resulting from urethral hypermobility and/or intrinsic sphincter deficiency	Pubourethral sling for treatment of stress urinary incontinence (SUI) resulting from urethral hypermobility and/or intrinsic sphincter deficiency
<b>Product Design</b>	Pre-shaped Dual-component mesh Polypropylene and bioabsorbable polymer	Pre-shaped Polypropylene mesh	Pre-shaped bioabsorbable polymer and Surgical mesh
<b>Materials</b>	Polypropylene & Polydioxanone (Bioabsorbable Polymer)	Polypropylene	Bioabsorbable polyester Polymer
<b>Sterilization</b>	EtO	EtO	EtO
<b>Packaging</b>	Tyvek pouch with outer heat sealed foil pouch	PVC tray with Tyvek back	Substantially Equivalent
<b>Size</b>	2cm x 15cm	1.1cm x 45cm	Substantially Equivalent



Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Room –WO66-G609  
Silver Spring, MD 20993-0002

Herniamesh USA, Inc.  
% Ms. Lorena Trabucco  
8 Orange Drive  
JERICHO NY 11753

SEP 28 2012

Re: K020652  
Trade/Device Name: T-Sling  
Regulation Number: 21 CFR 878.3300  
Regulation Name: Surgical mesh  
Regulatory Class: II  
Product Code: PAH  
Dated: February 21, 2002  
Received: February 28, 2002

Dear Ms. Trabucco:

This letter corrects our substantially equivalent letter of May 15, 2002.

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 (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.

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.

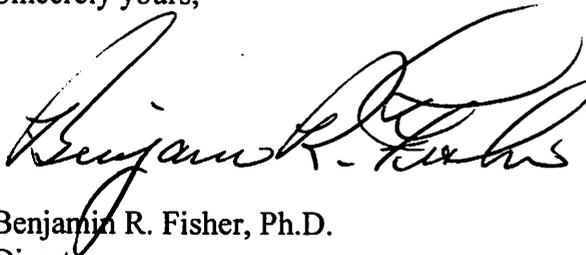
Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must

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.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to <http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. 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 the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Benjamin R. Fisher". The signature is fluid and cursive, written over a white background.

Benjamin R. Fisher, Ph.D.  
Director  
Division of Reproductive, Gastro-Renal,  
and Urological Devices  
Office of Device Evaluation  
Center for Devices and Radiological Health

Enclosure

Premarket Notification for Herniamesh T-Sling

Attachment # 1

Indications for Use Form

510(k) Number: K020652

Device Name: T-Sling

Indications For Use:

The Herniamesh T-sling is a dual-component pubourethral sling for the treatment of stress urinary incontinence (SUI) resulting from urethral hypermobility and/or intrinsic sphincter deficiency.

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use   
(per 21 CFR 801.109)

OR

Over-The-Counter Use  
(Optional Format 1-2-96)

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Miriam C. Provost  
(Division Sign-Off)  
Division of General, Restorative  
and Neurological Devices  
510(k) Number K020652