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Spinal Concepts, Inc. PathFinder

MAR 2 8 2003

510(k) Summary of Safety and Effectiveness

SUBMITTED BY	Spinal Concepts, Inc. 5301 Riata Park Court, Bldg Austin, TX 78727	3. F
ESTABLISHMENT REGISTRATION NUMBER	1649384	
CONTACT PERSON	<u>Primary</u> Lisa Peterson Regulatory Affairs Specialis Phone: 512-918-2700 Fax: 512-249-6734	<u>Alternate</u> David Hooper, Ph.D. t Director, Clinical and Regulatory Affairs Phone: 512-918-2700 Fax: 512-249-6734
DATE PREPARED	March 17, 2003	
CLASSIFICATION NAME	MNI 888.3070- Pedicle Screw Spinal System MNH 888.3070 – Spondylolisthesis Spinal Fixation System NKB 888.3070 – Pedicle Screw Fixation System, Degenerative Disc Disease	
COMMON NAME	Spinal Fixation System	
PROPRIETARY NAME	Spinal Concepts Inc. PathFinder	
PREDICATE DEVICE	Spinal Concepts Inc. InCompass Spinal Fixation System (K021564 and K023644). This is a design modification per established design control procedures.	

DEVICE DESCRIPTION

PathFinder is a modification to the existing Spinal Concepts Inc. InCompass polyaxial screw design. The design modification allows the components to be implanted through an open or mini open surgical technique. The mini-open surgical technique is conducted using k-wires and cannulated PathFinder screws.

INDICATIONS:

PathFinder - Mini-Open Posterior Approach

When intended for pedicle screw fixation from L1-S1, the indications include immobilization and stabilization of spinal segments in skeletally mature patients as an adjunct to fusion in the treatment of the following acute and chronic instabilities or deformities of the thoracic, lumbar and sacral spine: degenerative disc disease (defined as discogenic back pain with degeneration of the disc confirmed by history and radiographic studies), degenerative spondylolisthesis with objective evidence of neurologic impairment, fracture, dislocation, deformities or curvatures (i.e. scoliosis, kyphosis, and/or lordosis), tumor, and failed previous fusion.

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As a pedicle screw system placed between L3 and S1, the indications include Grade 3 or Grade 4 spondylolisthesis, when utilizing autologous bone graft, when affixed to the posterior lumbosacral spine, and intended to be removed after solid fusion is established.

After solid fusion occurs, these devices serve no functional purpose and should be removed. In most cases, removal is indicated because the implants are not intended to transfer or support forces developed during normal activities. Any decision to remove the device must be made by the physician and the patient, taking into consideration the patient's general medical condition and the potential risk to the patient of a second surgical procedure.

MECHANICAL TEST DATA

Mechanical testing data, including data collected in accordance with ASTM 1717 and ASTM 1798, was collected to verify that the design changes met established design requirements.



Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

MAR 2 8 2003

Ms. Lisa Peterson Regulatory Affairs Specialists Spinal Concepts, Inc. 12012 Technology Blvd, Suite 100 Austin, Texas 78727

Re: K030625 Trade/Device Name: Pathfinder Regulatory Number: 21 CFR 888.3070 Regulation Name: Pedicle Screw Fixation System Regulatory Class: III Product Code: NKB, MNI, MNH Dated: February 24, 2003 Received: February 27, 2003

Dear Ms. Peterson:

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.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), 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 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

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); 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.

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This letter will allow you to begin marketing your device as described in your Section 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), please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). 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) 443-6597 or at its Internet address http://www.fda.gov/cdrh/dsma/dsmamain.html

Sincerely yours, Mark A Milkerson

Celia M. Witten, Ph.D., M.D. Director Division of General and Restorative Devices Office of Device Evaluation Center for Devices and Radiological Health

Enclosure

510(k) Number (if known): $k \dot{0} 3 \alpha_{e25}$

Device Name:

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Spinal Concepts, Inc. PathFinder (Adjunct to InCompass Spinal Fixation System)

Indications for Use:

PathFinder - Mini-Open Posterior Approach

When intended for pedicle screw fixation from L1-S1, the indications include immobilization and stabilization of spinal segments in skeletally mature patients as an adjunct to fusion in the treatment of the following acute and chronic instabilities or deformities of the thoracic, lumbar and sacral spine: degenerative disc disease (defined as discogenic back pain with degeneration of the disc confirmed by history and radiographic studies), degenerative spondylolisthesis with objective evidence of neurologic impairment, fracture, dislocation, deformities or curvatures (i.e. scoliosis, kyphosis, and/or lordosis), tumor, and failed previous fusion.

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(Division Sign-Off)

Di ision of General. Restorative and Neurological Devices 510(k) Number <u>K0306</u>25

(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: (Optional Format 1-2-96)

(Division Sign-Off) Division of Coneral, Restorative and Neurological Devices

K030625 510(k) Number