510(k) Summary
V.A.C.® GranuFoam® Silver Protection Dressing

1. Submitter: KCI USA, Inc (Kinetic Concepts, Inc.)
   8023 Vantage Drive
   San Antonio, TX  78230

2. Contact Person: Christy Oviatt
   Sr. Regulatory Affairs Specialist

3. Date Summary Prepared: February 2, 2005

4. Name of Device: V.A.C.® GranuFoam® Silver Protection Dressing

5. Classification Name: Accessory to Powered Suction Pump
   21 CFR 878.4780
   Class II

6. Predicate Devices:
   V.A.C.® GranuFoam® Silver Dressing (K041642)
   V.A.C.® GranuFoam® Dressing (K032310)
   Johnson & Johnson Silvercel™ Wound Dressing (K024298)

7. Description of Device
   The V.A.C.® GranuFoam® Silver Protection dressing is an addition to the
   V.A.C.® product line of dressings designed specifically for use with the V.A.C.®
   Family of negative pressure devices.

8. Indication for Use
   The V.A.C.® GranuFoam® Silver Protection dressing is intended for use with the
   V.A.C.® family of negative pressure wound therapy systems to help promote
   wound healing. The dressing is an effective barrier to bacterial penetration and
   may help reduce infection in chronic, acute, traumatic, subacute, and dehisced
   wounds, diabetic ulcers, pressure ulcers, flaps, grafts and partial thickness burns.
9. Technological Characteristics and Substantial Equivalence

The V.A.C.® GranuFoam® Silver Protection dressing is comprised of black, reticulated, polyurethane foam covered with a silver coating. The substantial equivalence for the V.A.C.® GranuFoam® Silver Protection dressing is based on the indications, intended use and technological features.

The V.A.C.® GranuFoam® Silver Protection dressing is considered substantially equivalent to the V.A.C.® GranuFoam™ Silver dressing (K041642) and the Johnson & Johnson Silvercel™ Wound Dressing (K024298) in terms of an antimicrobial barrier. Comparative in vitro testing to demonstrate antibacterial effectiveness was conducted on the V.A.C.® GranuFoam® Silver Protection dressing, the V.A.C.® GranuFoam® Silver dressing and the Johnson & Johnson Silvercel™ Wound dressing.

The V.A.C.® GranuFoam® Silver Protection dressing is considered substantially equivalent to the V.A.C.® GranuFoam® Silver dressing (K041642) and the V.A.C.® GranuFoam® dressing (K032310) in terms of use with the V.A.C.® family of negative pressure devices used to help promote wound healing through means including drainage and removal of infectious material or other fluids. Comparative bench testing was conducted to provide evidence of equivalence in physical properties of the three dressings.

Verification of the biocompatibility of the V.A.C.® GranuFoam® Silver Protection dressing is based on GLP testing of the gamma-irradiated dressing in accordance with ISO-10993.

10. Conclusion

Based on the information presented above it is concluded that the V.A.C.® GranuFoam® Silver Protection dressing can be marketed for its intended use and is substantially equivalent to the identified predicate devices.
KCI USA, Inc.
% Ms. Christy Oviatt
6203 Farinon Drive
San Antonio, Texas 78230

Re: K050261
  Trade/Device Name: V.A.C.® GranuFoam® Silver Protection Dressing
  Regulation Number: 21 CFR 878.4780
  Regulation Name: Powered Suction Pump
  Regulatory Class: II
  Product Code: OMP
  Dated: April 25, 2005
  Received: April 26, 2005

Dear Ms. Oviatt:

This letter corrects our substantially equivalent letter of May 26, 2005.

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); 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.

This letter will allow you to continue 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 (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at (240) 276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at (240) 276-3464. 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 (240) 276-3150 or at its Internet address http://www.fda.gov/cdrh/dsma/dsmamain.html.

Sincerely yours,

Mark N. Melkerson
Director
Division of General, Restorative and Neurological Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure
Indications for Use

510 (k) Number (if known): K050261

Device Name: V.A.C.® GranuFoam® Silver Protection Dressing

Indications for Use:

The V.A.C.® GranuFoam® Silver Protection dressing is intended for use with the V.A.C.® family of negative pressure wound therapy systems to help promote wound healing. The dressing is an effective barrier to bacterial penetration and may help reduce infection in chronic, acute, traumatic, subacute, and dehisced wounds, diabetic ulcers, pressure ulcers, flaps, grafts and partial thickness burns.