JUN 17 2005

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ZODIAC™ Spinal Fixation System
510(k) SUMMARY
May 2005

Company: Alphatec Manufacturing, Inc.
6110 Corte Del Cedro
Carlsbad, CA 92009 USA
Telephone: (760) 431-9286
Fax: (760) 431-9132

Contact Person: Ellen Yarnall, Director of RA/QA

Trade/Proprietary Name: ZODIAC™ Spinal Fixation System

Common Name: Pedicle Screw Spinal System

Classification Name: Spinal Interlaminal Fixation Orthosis (888.3050)(KWP)
Spinal Pedicle Fixation (888.3070)(MNI)
Orthosis, Spondylolythisis Spinal Fixation (888.3070)(MNH)

Product Description:

The ZODIAC™ Spinal Fixation System is comprised of various types and sizes of implantable components that are assembled to create a rigid spinal construct. System components are offered in titanium alloy, Ti-6Al-4V ELI (ASTM F 136). System rods are also available in commercially pure titanium, CP Grade 4 (ASTM G67).

This submission seeks clearance for stainless steel (ASTM F 138) system components.

Indications for Use:

It is intended that this device, in any system configuration be removed after development of solid fusion mass. Hook component indications are limited to T7-L5. Sacral screw indications are limited to the sacrum only.

1) The ZODIAC™ Spinal Fixation System, when used as a hook and sacral screw fixation system (nonpedicle screw) is intended for:

   a. Patients having fractures of the thoracic and lumbar spine.
   b. Patients having deformity (i.e., idioscoliosis, neuromuscular scoliosis, or kyphoscoliosis with associated paralysis or spasticity).
   c. Patients having spondylolisthesis (i.e., isthmic spondylolisthesis, degenerative spondylolisthesis, and acute pars fracture allowing spondylolisthesis).

2) The ZODIAC™ Spinal Fixation System, when used as a pedicle screw system in the thoraco-lumbo-sacral region of the spine is intended for degenerative spondylolisthesis with objective evidence of neurologic impairment, fracture, dislocation, scoliosis, kyphosis, spinal tumor and failed previous fusion (pseudoarthrosis).

3) In addition, the ZODIAC™ Spinal Fixation System, when used as a pedicle screw fixation system is intended for:

a. Patients receiving only autogenous bone graft.
b. Patients having the device fixed or attached to the lumbar and sacral spine and having severe spondylolisthesis grade 3 or 4 at the fifth lumbar-first sacral (L5-S1) vertebral joint.

4) The ZODIAC™ Spinal Fixation System, when used as a laminar hook and bone screw system is intended for:

a. Patients having fractures of thoracic and lumbar spine.
b. Patients having thoracolumbar deformity (i.e., idioscoliosis, neuromuscular scoliosis, or kyphoscoliosis with associated paralysis or spasticity).
c. Patients having spondylolisthesis (i.e., isthmic spondylolisthesis, degenerative spondylolistheses and acute pars fracture allowing spondylolisthesis).

Substantial Equivalence:

Substantial equivalence for the ZODIAC™ Spinal Fixation System manufactured from stainless steel material is the same as the ZODIAC Spinal Fixation System previously cleared under K033090 and K042673.

Performance Data

Performance data were submitted to characterize the ZODIAC™ Spinal Fixation System manufactured from stainless steel.

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

JUN 17 2005

Ms. Ellen A. Yarnall
Director of Regulatory Affairs
Alphatec Manufacturing Incorporated
6110 Corte Del Cedro
Carlsbad, California 92009

Re: K051286
Trade/Device Name: ZODIAC™ Spinal Fixation System
Regulation Number: 21 CFR 888.3050, 888.3070
Regulation Name: Spinal interlaminal fixation orthosis, Pedicle screw spinal system
Regulatory Class: II
Product Code: MNH, MNI, KWP
Dated: May 17, 2005
Received: May 18, 2005

Dear Ms. Yarnall:

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 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 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 (240) 276-0120 . 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/industry/support/index.html.

Sincerely yours,

Miriam C. Provost, Ph.D.
Acting 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): K051286

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Prescription Use __X___ AND/OR - Over-The Counter Use _____
(Part 21 CFR 801 Subpart D) (21 CFR 801 Subpart C)

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

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

510(k) Number K051286