DEC 19 2005

Summary of Safety and Effectiveness

Submitter: Zimmer, Inc.
P.O. Box 708
Warsaw, IN 46581-0708

Contact Person: Dalene T. Binkley
Senior Associate, Regulatory Affairs
Telephone: (574) 372-4907
Fax: (574) 372-4605

Date: December 16, 2005

Trade Name: Zimmer Trabecular Metal™ Reverse Shoulder System

Common Name: Total-Shoulder System and Hemi-Shoulder System

Classification Name and Reference:
1. Prosthesis, Shoulder, Semi-constrained, metal/polymer cemented (KWS)
2. Shoulder joint humeral (hemi-shoulder) metallic uncemented prosthesis (HSD)
3. Shoulder joint metal/polymer non-constrained cemented prosthesis (KWT)

21 CFR § 888.3660, 888.3690 and 888.3650


Delta Shoulder, manufactured by DePuy, K021478, cleared November 18, 2003.

Encore Reverse Shoulder Prosthesis, manufactured by Encore Medical, L.P., K041066, cleared March 24, 2005.

Device Description: The Zimmer Trabecular Metal™ Reverse Shoulder System is a modular total shoulder prosthesis that was designed specifically to include patients with non-functional rotator cuffs. It was developed to either encompass a traditional shoulder prosthesis, a reverse design or be transformed into a hemi-prosthesis depending on clinical cases encountered during the surgical procedure.

Intended Use: The Zimmer Trabecular Metal Reverse Shoulder System is indicated for the following:

*Reverse application:*
- the treatment of severe pain or significant disability in degenerative, rheumatoid, or traumatic disease of the glenohumeral joint,
- ununited humeral head fractures of long duration,
- irreducible 3-and 4-part proximal humeral fractures,
- avascular necrosis of the humeral head,
- rotator cuff arthropathy, or
- other difficult clinical management problems (such as a failed total shoulder arthroplasty or grossly rotator cuff deficient joint) where arthrodesis or resectional arthroplasty is not acceptable.

*Hemiarthroplasty/Total application:*
- the treatment of severe pain or significant disability in degenerative, rheumatoid, or traumatic disease of the glenohumeral joint,
- ununited humeral head fractures of long duration,
- irreducible 3-and 4-part proximal humeral fractures,
- avascular necrosis of the humeral head,
- rotator cuff arthropathy, or
- other difficult clinical management problems where arthrodesis or resectional arthroplasty is not acceptable.
The assembled humeral component may be used alone for hemiarthroplasty or combined with the glenoid component or reverse components for total shoulder arthroplasty (conventional or reverse applications).

The Trabecular Metal humeral and reverse base plate components are intended for either cemented or uncemented use. The reverse base plate requires two screws for initial fixation.

**Comparison to Predicate Device:**

The Zimmer Trabecular Metal Reverse Shoulder System is packaged, manufactured, and sterilized using the same or similar materials and processes as the predicate devices. The subject device also has similar intended use and fixation methods as the predicate devices.

**Performance Data (Nonclinical and/or Clinical):**

Non-clinical testing demonstrated that the Zimmer Trabecular Metal Reverse Shoulder System is as safe and effective as the predicate devices.
Dear Ms. Binkley:

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" (21 CFR 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 N. Melkerson
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):

Device Name:

Zimmer Trabecular Metal™ Reverse Shoulder System

Indications for Use:

The Zimmer Trabecular Metal Reverse Shoulder System is indicated for the following:

Reverse application:

- the treatment of severe pain or significant disability in degenerative, rheumatoid, or traumatic
disease of the glenohumeral joint;
- ununited humeral head fractures of long duration;
- irreducible 3-and 4-part proximal humeral fractures;
- avascular necrosis of the humeral head, or other difficult clinical management problems (such as a
failed total shoulder arthroplasty or grossly rotator cuff deficient joint) where arthrodesis or
resectional arthroplasty is not acceptable.

Hemiarthroplasty/Total application:

- the treatment of severe pain or significant disability in degenerative, rheumatoid, or traumatic
disease of the glenohumeral joint;
- ununited humeral head fractures of long duration;
- irreducible 3-and 4-part proximal humeral fractures;
- avascular necrosis of the humeral head, or other difficult clinical management problems where
arthrodesis or resectional arthroplasty is not acceptable.

The assembled humeral component may be used alone for hemiarthroplasty or combined with the
glenoid component or reverse components for total shoulder arthroplasty (conventional or reverse
applications).

The Trabecular Metal humeral and reverse base plate components are intended for either cemented or
uncemented use. The reverse base plate requires two screws for initial fixation.

Prescription Use _X_  
(21 CFR 801 Subpart D)

AND/OR  
Over-The-Counter Use  
(21 CFR 807 Subpart C)

(Please do not write below this line – Continue on another page if needed)

Division of General, Restorative, and Neurological Devices

510(k) Number _KO52906_