# Premarket Notification [510(k)] Summary

AUG 2 4 2006

This summary of 510(k) safety and effectiveness information is being submitted in accordance with the requirements of SMDA 1990 and 21 CFR 807.92

The assigned 510(k) number is : \_\_\_\_\_K060854\_\_\_\_\_

Company:

Horiba ABX

Parc Euromédecine

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**FRANCE** 

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Contact Person: Tim Lawton (tlawton@fr.abx.fr)

Date Prepared: 10 July 2006

#### **Device Names:**

The following reagents, controls & calibrators are for use in conjunction with the ABX PENTRA 400, cleared to market under K052007.

**REAGENTS:** 

Trade/Proprietary Name:

**ABX PENTRA Cholesterol CP** 

Common or Usual Name:

Cholesterol

**Device Class** 

Class I

Classification Name:

§862.1175: Cholesterol (Total) Test System

Product Code:

CHH; Enzymatic Esterase-Oxidase, Cholesterol

Trade/Proprietary Name:

ABX PENTRA HDL Direct CP

Common or Usual Name:

Device Class

Class I

Classification Name:

§862.1475: Lipoprotein Test System

Product Code:

LBS; LDL/VLDL Precipitation, Cholesterol via Esterase-Oxidase,

Trade/Proprietary Name:

ABX PENTRA LDL Direct CP

Common or Usual Name:

LDL Cholesterol

HDL Cholesterol

Device Class

Class I

Classification Name:

§862.1475 : Lipoprotein Test System

Product Code:

LBS; LDL/VLDL Precipitation, Cholesterol via Esterase-Oxidase,

Trade/Proprietary Name:

**ABX PENTRA Triglycerides CP** 

Common or Usual Name:

Triglycerides

Device Class

Class I

Classification Name:

§862.1705: Triglycerides Test System

Product Code:

CDT; Lipase Hydrolysis/Glycerol Kinase Enzyme, Triglycerides

CALIBRATORS:

Trade/Proprietary Name: ABX PENTRA HDL Cal

Common or Usual Name:

HDL Calibrator

Device Class

Class II

Classification Name:

§862.1150 : Calibrator

Product Code:

JIT; Calibrator, Secondary

Trade/Proprietary Name:

**ABX PENTRA LDL Cal** 

Common or Usual Name:

LDL Calibrator

**Device Class** 

Class II

Classification Name:

§862.1150 : Calibrator

Product Code:

JIT; Calibrator, Secondary

Trade/Proprietary Name:

**ABX PENTRA Multical** (K052007)

Common or Usual Name:

Multical

Device Class

Class II

Classification Name:

§862.1150 : Calibrator

Product Code:

JIX; Calibrator, Multi-Analyte Mixture

**CONTROLS:** 

Trade/Proprietary Name:

**ABX PENTRA N Control** (K052007)

Common or Usual Name:

N Control

Device Class

Class I

Classification Name:

§862.1660 : Quality control material (assayed)

Product Code:

JJY : Multi-Analyte Controls, All Kinds (Assayed)

Trade/Proprietary Name:

**ABX PENTRA P Control** (K052007)

Common or Usual Name:

P Control

Device Class

Product Code:

Class I

Classification Name:

§862.1660 : Quality control material (assayed)

JJY ; Multi-Analyte Controls, All Kinds (assayed)

<u>CLEANING SOLUTIONS:</u> Trade/Proprietary Name:

ABX PENTRA Clean-Chem CP (K052007)

Common or Usual Name:

Cleaning solution : Clean-Chem

Device Class

Class I: Exempt from Premarket

Classification Name:

Not available Not available

Product Code:

Trade/Proprietary Name:

ABX PENTRA Clean-Chem 99 CP (K052007)

Common or Usual Name:

Device Class

Classification Name:

Product Code:

Cleaning solution: Clean-Chem 99 Class I: Exempt from Premarket

Not available Not available

#### Substantial Equivalence:

The data and information supplied in this submission demonstrates substantial equivalence to their respective predicate devices:

| Submission device           | Substantially equivalent Predicate device |
|-----------------------------|---|
| ABX PENTRA Cholesterol CP   | K941573                                   |
| ABX PENTRA HDL Direct CP    | K021316                                   |
| ABX PENTRA LDL Direct CP    | K971573                                   |
| ABX PENTRA Triglycerides CP | K893973                                   |
|                             |   |
| ABX PENTRA HDL Cal          | K021316                                   |
| ABX PENTRA LDL Cal          | K971573                                   |
| ABX PENTRA Multical         | K052007                                   |
|                             |   |
| ABX PENTRA N Control        | K052007                                   |
| ABX PENTRA P Control        | K052007                                   |

#### **Description:**

All the reagents, controls and calibrators included in this submission are for use on the ABX PENTRA 400 (K052007), which is a discrete photometric benchtop clinical chemistry analyzer.

The ABX PENTRA Cholesterol CP is an in vitro diagnostic assay for the quantitative determination of cholesterol in human serum and plasma based on an enzymatic photometric test (Trinder's reaction). The assay is composed of a 99 ml mono-reagent cassette. Reagent is a chemical solution with additives.

The ABX PENTRA HDL Direct CP is an in vitro diagnostic assay for the quantitative determination of High Density Lipoprotein Cholesterol (HDL-C) in human serum and plasma based on an enzymatic test, with accelerator selective detergent methodology. The assay is composed of a bi-reagent cassette, with 62 ml and 21 ml compartments. Reagents are chemical solutions with additives.

The ABX PENTRA HDL Direct CP is an in vitro diagnostic assay for the quantitative determination of Low Density Lipoprotein Cholesterol (LDL-C) in human serum and

plasma based on an enzymatic colorimetric test. It is composed of a bi-reagent cassette, with 28 ml and 10 ml compartments. Reagents are chemical solutions with additives.

The **ABX PENTRA Triglycerides CP** is an in vitro diagnostic assay for the quantitative determination of triglycerides in human serum and plasma based on an enzymatic colorimetric test. It is composed of a 99 ml mono-reagent cassette. Reagent is a chemical solution with additives.

The **ABX PENTRA HDL Cal** is a lyophilized calibrator prepared from human serum. It is used for the calibration of the HDL-C assay. The assigned value is given in the enclosed annex. This calibrator is provided in two vials of 1 ml.

The **ABX PENTRA LDL Cal** is a lyophilized calibrator prepared from human serum. It is used for the calibration of the LDL-C assay. The assigned value is given in the enclosed annex. This calibrator is provided in two vials of 1 ml.

The **ABX PENTRA Multical** is a lyophilized human serum calibrator with chemical additives and materials of biological origin. The assigned values of the calibrator components are given in the enclosed annex, ensuring optimal calibration of the appropriate HORIBA ABX methods on the ABX PENTRA 400 analyzer. This calibrator is provided in ten vials of 3 ml.

The **ABX PENTRA N Control** and **ABX PENTRA P Control** are quality control products consisting of lyophilized human serum with chemical additives and materials of biological origin added as required to obtain given component levels. The assigned values of the control components are given in the enclosed annexes, ensuring control of the appropriate HORIBA ABX methods on the ABX PENTRA 400 analyzer. Each control is provided in ten vials of 5 ml.

The ABX PENTRA Clean-Chem CP and ABX PENTRA Clean-Chem 99 CP are ready-to-use chemical cleaning solutions for use on the ABX Pentra 400 system. They are respectively provided in mono-reagent 30 ml and 4 x 99 ml cassettes.

#### Intended Use:

All reagents in this submission are intended for use on the **ABX PENTRA 400** for the quantitative in-vitro determination of their respective analytes: Cholesterol, HDL-C, LDL-C and Triglycerides using human serum and plasma.

The controls, calibrators and additional reagents are intended for use in association with the above reagents.

## **Discussion of Performance Data:**

| ABX PENTRA Cholesterol CP: |  |
|----------------------------|--|
| Sample type                | Serum & plasma   |
| Detection limit            | 4 mg/dl  |
| Accuracy and Precision     | CV Total < 3.01%   |
| Measuring range            | 2.55 mg/dl – 583.26 mg/dl  |
| Upper linearity limit      | 580 mg/dl  |
| Correlation (n=135)        | $Y = 0.95 \text{ x} + 1.90 \text{ with a correlation coefficient } r^2 = 0.9943.$    |
| Calibration stability      | 8 days   |
| Reagent stability          | closed stability: 24 months at 2-8°C on-board stability (refrigerated area): 48 days |

| ABX PENTRA HDL Direct CP: |  |
|---------------------------|--|
| Sample type               | Serum & plasma   |
| Detection limit           | I.16 mg/dl   |
| Accuracy and Precision    | CV Total < 3.52%   |
| Measuring range           | 5.4 mg/dl – 151.9 mg/dl  |
| Upper linearity limit     | 154.8 mg/dl  |
| Correlation (n=121)       | $Y = 0.91 x + 1.98$ with a correlation coefficient $r^2 = 0.9768$ .                  |
| Calibration stability     | 14 days  |
| Reagent stability         | closed stability: 22 months at 2-8°C on-board stability (refrigerated area): 31 days |

| ABX PENTRA LDL Direct CP: |  |
|---------------------------|--|
| Sample type               | Serum & plasma   |
| Detection limit           | 1.55 mg/dl   |
| Accuracy and Precision    | CV Total < 6.39%   |
| Measuring range           | 1.35 mg/dl – 369.39 mg/dl  |
| Upper linearity limit     | 387 mg/dl  |
| Correlation (n=122)       | $Y = 0.96 \text{ x} - 0.21 \text{ with a correlation coefficient } r^2 = 0.9963.$    |
| Calibration stability     | 12 days  |
| Reagent stability         | closed stability: 18 months at 2-8°C on-board stability (refrigerated area): 97 days |

| ABX PENTRA Triglycerides CP: |  |
|------------------------------|--|
| Sample type                  | Serum & plasma   |
| Detection limit              | 7 mg/dl  |
| Accuracy and Precision       | CV Total < 2.83%   |
| Measuring range              | 3.1 mg/dl – 1434 mg/dl   |
| Upper linearity limit        | 1470 mg/dl, with an automatique post-dilution : 5580 mg/dl                           |
| Correlation (n=135)          | $Y = 0.99 \text{ x} + 0.20 \text{ with a correlation coefficient } r^2 = 0.9994.$    |
| Calibration stability        | 14 days  |
| Reagent stability            | closed stability: 16 months at 2-8°C on-board stability (refrigerated area): 48 days |

## **CALIBRATORS**

| ABX PENTRA HDL Cal: |   |
|---------------------|---|
| Analytes            | High Density Lipoprotein Cholesterol (HDL-C)  |
| Format              | Lyophilized preparation of human serum  |
| Stability           | Closed stability: 24 months at 2°C to 8°C Open stability:  14 days at 2°C to 8°C 4 weeks at -70°C |

| ABX PENTRA LDL Cal: |   |
|---------------------|---|
| Analytes            | Low Density Lipoprotein Cholesterol (LDL-C)                                     |
| Format              | Lyophilized preparation of human serum  |
| Stability           | Closed stability: 24 months at 2°C to 8°C Open stability: 2 weeks at 2°C to 8°C |

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| Analytes                    | Already cleared (K052007)  | Included in this submission     |
|-----------------------------|--|---------------------------------|
| Alkaline phosphatase*       |  |                                 |
| Alanine aminotransferase*   |  |                                 |
| Amylase*                    |  |                                 |
| Aspartate aminotransferase* |  |                                 |
| Creatine kinase*            |  |                                 |
| GGT*                        |  |                                 |
| Lactate Dehydrogenase*      |  |                                 |
| Lipase*                     |  |                                 |
| Albumin*                    |  |                                 |
| Direct Bilirubin*           |  |                                 |
| Total Bilirubin*            |  |                                 |
| Calcium*                    |  |                                 |
| Cholesterol                 |  | √                               |
| Creatinine*                 |  |                                 |
| Glucose HK                  | √  | N.                              |
| Glucose PAP                 | $\checkmark$   | √.                              |
| Iron*                       |  |                                 |
| Lactic acid*                |  |                                 |
| Magnesium*                  |  |                                 |
| Phosphorus*                 |  |                                 |
| Total Protein*              |  |                                 |
| Triglycerides               |  | 1                               |
| Urea / Blood Urea Nitrogen* |  |                                 |
| Uric acid*                  |  |                                 |
|                             | Lyophilized human serum with cl<br>of biological origin  | hemical additives and materials |
|                             | Closed stability: 24 months at 2-8°C Open stability: Once opened, the calibrator components** are stable for: 8 hours at 15°C to 25°C 2 days at 2°C to 8°C 2 weeks at -25°C to -15°C |                                 |
|                             | **Exceptions Direct Bilirubin 3 hours at 15°C to 25°C 8 hours at 2°C to 8°C 2 weeks at -25°C to -15°C  | ·                               |
|                             | Fotal Bilirubin 6 hours at 15°C to 25°C 1 day at 2°C to 8°C 2 weeks at -25°C to -15°C  |                                 |

<sup>\*</sup> Not cleared as of date of submission

## **CONTROLS**

| ABX PENTRA N Control:       |   |                                 |
|-----------------------------|---|---------------------------------|
| Analytes                    | Already cleared (K052007)   | Included in this submission     |
| Alkaline phosphatase*       |   |                                 |
| Alanine aminotransferase*   |   |                                 |
| Amylase*                    |   |                                 |
| Aspartate aminotransferase* |   |                                 |
| Creatine kinase*            |   |                                 |
| GGT*                        |   |                                 |
| Lactate Dehydrogenase*      |   |                                 |
| Lipase*                     |   |                                 |
| Albumin*                    |   | ·                               |
| Direct Bilirubin*           |   |                                 |
| Total Bilirubin*            |   |                                 |
| Calcium*                    |   |                                 |
| Chloride                    | <b>V</b>  | ų <sup>†</sup>                  |
| Cholesterol                 |   | 7                               |
| HDL                         |   | V                               |
| LDL                         |   | V                               |
| Creatinine*                 |   |                                 |
| Glucose HK                  | V   | 4                               |
| Glucose PAP                 | <del>\( \lambda \)</del>  | ý                               |
| Iron*                       | · ·   | ·                               |
| Lactic acid*                |   |                                 |
| Magnesium*                  |   |                                 |
| Phosphorus*                 |   |                                 |
| Potassium                   | 1   | J                               |
| Sodium                      | N N   | Ý                               |
| Total Protein*              |   | Y                               |
| Triglycerides               |   |                                 |
| Urea / Blood Urea Nitrogen* | · · · · · · · · · · · · · · · · · · ·                                 | V                               |
| Uric acid*                  |   |                                 |
| one dela                    |   |                                 |
|                             |   | ,                               |
| Format                      | Lyophilized human serum with ch                                       | nemical additives and materials |
|                             | of biological origin  | ionnear additives and materials |
|                             |   |                                 |
| Stability                   |   |                                 |
|                             | Closed stability: 30 months at 2-8                                    | °C                              |
|                             | Open stability: Once opened, the control components** are stable for: |                                 |
|                             |   |                                 |
| İ                           | 12 hours at 15°C to 25°C  |                                 |
|                             | 5 days at 2°C to 8°C  |                                 |
|                             | 1 month at -25°C to -15°C   |                                 |
| ļ                           | **[   |                                 |
|                             | **Exceptions  |                                 |

## **ABX PENTRA N Control:**

Direct Bilirubin

4 hours at 15°C to 25°C

8 hours at 2°C to 8°C

2 weeks at -25°C to -15°C

Total Bilirubin

8 hours at 15°C to 25°C

1 day at 2°C to 8°C

2 weeks at -25°C to -15°C

THIS PART IS LEFT INTENTIONALLY BLANK

<sup>\*</sup> Not cleared as of date of submission

| Analytes                    | Already cleared (K052007)  | Included in this submission |
|-----------------------------|--|-----------------------------|
| Alkaline phosphatase*       |  |                             |
| Alanine aminotransferase*   |  |                             |
| Amylase*                    |  |                             |
| Aspartate aminotransferase* |  |                             |
| Creatine kinase*            |  |                             |
| GGT*                        |  |                             |
| Lactate Dehydrogenase*      |  |                             |
| Lipase*                     |  |                             |
| Albumin*                    |  |                             |
| Direct Bilirubin*           |  |                             |
| Total Bilirubin*            |  |                             |
| Calcium*                    |  |                             |
| Chloride                    | <b>V</b>   | √ V                         |
| Cholesterol                 | •  | 1                           |
| HDL                         |  | -1                          |
| LDL                         |  | <u>\</u>                    |
|                             |  | <u>V</u>                    |
| Creatinine* Glucose HK      |  |                             |
|                             | <b>√</b>   | , v                         |
| Glucose PAP                 | √  | V                           |
| Iron*                       |  |                             |
| Lactic acid*                |  |                             |
| Magnesium*                  |  |                             |
| Phosphorus*                 |  |                             |
| Potassium                   | ٧  | <u></u> _                   |
| Sodium                      | √  | V                           |
| Total Protein*              |  |                             |
| Triglycerides               |  | <b>V</b>                    |
| Urea / Blood Urea Nitrogen* |  |                             |
| Uric acid*                  |  |                             |
| Stability                   | Lyophilized human serum with chemical additives and mate of biological origin  Closed stability: 30 months at 2-8°C  Open stability: |                             |
|                             | Once opened, the control components 12 hours at 15°C to 25°C 5 days at 2°C to 8°C 1 month at -25°C to -15°C                          |                             |
|                             | **Exceptions Direct Bilirubin 4 hours at 15°C to 25°C 8 hours at 2°C to 8°C 2 weeks at -25°C to -15°C                                |                             |
| İ                           | Гotal Bilirubin  | /                           |

| 8 hours at 15°C to 25°C   |  |
|---------------------------|--|
| 1 day at 2°C to 8°C       |  |
| 2 weeks at -25°C to -15°C |  |

<sup>\*</sup> Not cleared as of date of submission

#### **CLEANING SOLUTIONS**

| ABX PENTRA Clean-Chem CP: |   |
|---------------------------|---|
| Format                    | Chemical liquid solution  |
| Stability                 | Closed stability: 8 months at 2-8°C On-board stability (refrigerated area): 15 days |

| ABX PENTRA Clean-Chem 99 CP: |   |  |
|------------------------------|---|--|
| Format                       | Chemical liquid solution  |  |
| Stability                    | Closed stability: 8 months at 2-8°C On-board stability (refrigerated area): 45 days |  |

## **Conclusions for Performance Testing:**

The performance testing data conclude that the safety and effectiveness of the devices are not compromised, and that they met all acceptance criteria, demonstrating that the devices are substantially equivalent to their respective predicate devices.





Food and Drug Administration 2098 Gaither Road Rockville MD 20850

Mr. Tim Lawton Regulatory Affairs Manager Horiba ABX Parc Euromèdecine Rue du Caducèe – BP 7290 34184 Montpellier cedex 4 - France

AUG 2 4 2006

Re:

k060854

Trade/Device Name: Lipoproteins and associated calibrators and controls on ABX

PENTRA 400 Clinical Chemistry Analyzer

Regulation Number: 21CFR§-862.1150

Regulation Name: Calibrator Regulatory Class: Class II

Product Code: JIT, CHH, JJY, CDT, LBR, MRR

Dated: July 10, 2006 Received: July 14, 2006

#### Dear Mr. Lawton:

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 Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. 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 Parts 801 and 809); and good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820).

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 information about the application of labeling requirements to your device, or questions on the promotion and advertising of your device, please contact the Office of In Vitro Diagnostic Device Evaluation and Safety at (240) 276-0484. 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 <a href="http://www.fda.gov/cdrh/industry/support/index.html">http://www.fda.gov/cdrh/industry/support/index.html</a>.

Sincerely yours,

Alberto Gutierrez, Ph.D.

Director

Division of Chemistry and Toxicology Office of In Vitro Diagnostic Device

Evaluation and Safety

Center for Devices and Radiological Health

Enclosure

# **Indications for Use**

| 510(k) Number (if known): <u>k060854</u>   |  |  |  |  |
|--|--|--|--|--|
| Device Name: <u>Lipoproteins and associated calibrators and controls on ABX PENTRA</u> 400 Clinical Chemistry Analyzer   |  |  |  |  |
| Indications For Use:   |  |  |  |  |
| ABX PENTRA Cholesterol CP reagent with associated calibrators and controls are for quantitative in vitro diagnostic determination of cholesterol in human serum and plasma based on an enzymatic photometric test (Trinder's reaction).  |  |  |  |  |
| ABX PENTRA HDL Direct CP reagent with associated calibrators and controls are for quantitative in vitro diagnostic determination of High Density Lipoprotein Cholesterol (HDL-C) in human serum and plasma based on an enzymatic assay with accelerator selective detergent methodology. |  |  |  |  |
| ABX PENTRA LDL Direct CP reagent with associated calibrators and controls are for quantitative in vitro diagnostic determination of Low Density Lipoprotein Cholesterol (LDL-C) in human serum and plasma based on an enzymatic colorimetric assay.                                      |  |  |  |  |
| Cholesterol measurements are used in the diagnosis and treatment of disorders involving excess cholesterol in the blood and lipid and lipoprotein metabolism disorders.  |  |  |  |  |
| Prescription Use X AND/OR Over-The-Counter Use (21 CFR 801 Subpart C)  |  |  |  |  |
| (PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)   |  |  |  |  |
| Concurrence of CDRH, Office of In Vitro Diagnostic Devices (OIVD)  |  |  |  |  |
| Page 1 of2   |  |  |  |  |
| Division Sign-Off  |  |  |  |  |
| Office of In Vitro Diagnostic Device  Evaluation and Safety  |  |  |  |  |
|  |  |  |  |  |

K060854

### **Indications for Use**

510(k) Number (if known): k060854

Device Name: <u>Lipoproteins and associated calibrators and controls on ABX PENTRA</u>
400 Clinical <u>Chemistry Analyzer</u>

Indications For Use:

ABX PENTRA Triglycerides CP reagent with associated calibrators and controls are for quantitative in vitro diagnostic determination of triglycerides in human serum and plasma based on an enzymatic colorimetric assay.

Measurements obtained by this device are used in the diagnosis and treatment of patients with diabetes mellitus, nephrosis, liver obstruction, other diseases involving lipid metabolism, or various endocrine disorders.

The ABX PENTRA HDL Cal is a calibrator for use in the calibration of quantitative Horiba ABX PENTRA HDL Direct CP method on Horiba ABX clinical chemistry analyzers.

The ABX PENTRA LDL Cal is a calibrator for use in the calibration of quantitative Horiba ABX PENTRA LDL Direct CP method on Horiba ABX clinical chemistry analyzers.

| Prescription Use X          | AND/OR | Over-The-Counter Us    |
|-----------------------------|--------|------------------------|
| (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 In Vitro Diagnostic Devices (OIVD)

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Jivision Sign-Off

Office of In Vitro Diagnostic Device Evaluation and Safety

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