K070094

510(k) Summary

The information below is provided for the Modifications to the Trilogy ™ Delivery System and Trilogy Tx Delivery System, following the format of 21 CFR 807.92.

FEB 9 2007

1. Submitter:

Varian Medical Systems
3100 Hansen Way, M/S e110
Palo Alto, CA 94304
Contact Name: Vy Tran
Phone: 650/424.5731
Fax: 650/842.5040
E-mail: vy.tran@varian.com

2. Name of the Device: Trilogy ™ Delivery System and Trilogy Tx Delivery System
   Trade / Proprietary Name: Trilogy ™ Delivery System and Trilogy Tx Delivery System
   Common or Usual Name: Trilogy ™ Delivery System and Trilogy Tx Delivery System
   Classification Name: Medical Charged Particle Radiation Therapy System
   21 CFR §892.5050
   Class II
   Product Code: 90 IYE

3. Predicate Devices to claim substantial equivalence:
   Varian Medical Systems Trilogy Tx Radiotherapy Delivery System – K061140 and Varian Medical Systems Trilogy Radiotherapy Delivery System – K033343

4. Description of the Device:

   The changes to the Trilogy Radiotherapy Delivery System and Trilogy Tx Delivery System provide a modified software algorithm that implements gradual acceleration and deceleration of gantry rotation with direct drive.

   All other features of the Trilogy Radiotherapy Delivery System and Trilogy Tx Delivery System remain as cleared by K061140 and K033343, respectively.

5. Intended Use Statement

   The Trilogy ™ Delivery System and Trilogy Tx Delivery System are intended to provide stereotactic radiosurgery and precision radiotherapy for lesions, tumors and conditions anywhere in the body when radiation treatment is indicated.

6. Indications for Use Statement

   The Trilogy ™ Delivery System and Trilogy Tx Delivery System are indicated for stereotactic radiosurgery and precision radiotherapy for lesions, tumors and conditions anywhere in the body when radiation treatment is indicated.

7. Substantial Equivalence

   The Modifications to the Trilogy ™ Delivery System and Trilogy Tx Delivery System submission illustrates substantial equivalence to the predicate devices.

DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
9200 Corporate Blvd.
Rockville MD 20850

Ms. Vy Tran
Corporate Director Regulatory Affairs
Varian Medical Systems, Inc.
3100 Hansen Way, MS E-110
PALTO CA 94304-1038

FEB 9 2007

Re: K070094
Trade/Device Name: Trilogy™ Delivery System and Trilogy Tx Delivery System
Regulation Number: 21 CFR 892.5050
Regulation Name: Medical charged-particle radiation therapy system
Regulatory Class: II
Product Code: IYE
Dated: January 8, 2007
Received: January 10, 2007

Dear Ms. Tran:

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 (Premarket Approval), 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 one of the following numbers, based on the regulation number at the top of this letter:

21 CFR 876.xxx	(Gastroenterology/Renal/Urology	240-276-0115
21 CFR 884.xxx	(Obstetrics/Gynecology)	240-276-0115
21 CFR 894.xxx	(Radiology)	240-276-0120
Other		240-276-0100

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 (240) 276-3150
or at its Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely yours,

Nancy C Brogdon

Nancy C. Brogdon
Director, Division of Reproductive,
Abdominal, and Radiological Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure

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Indications for Use Statement

510(k) Number (if known): K070094

Device Name: Trilogy ™ Delivery System and Trilogy Tx Delivery System

Indications for Use:

The Trilogy ™ Delivery System and Trilogy Tx Delivery System are indicated for stereotactic radiosurgery and precision radiotherapy for lesions, tumors and conditions anywhere in the body when radiation treatment is indicated.

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use ✓ OR Over-the-counter _____
(Per 21 CFR § 801.109)

David A. Segerson

(Division Sign-Off)
Division of Reproductive, Abdominal,
and Radiological Devices
510(k) Number K070094