5. 510(K) SUMMARY AS REQUIRED BY 21 CFR 807.92

Submitter:
Ash Access Technology, Inc.
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JUN 26 2007

Contact:
Roland Winger
Ash Access Technology, Inc.
3601 Sagamore Pkwy N, Suite B
Lafayette, IN 47904
Tel. 765.742.4813

Date Summary was Prepared: February 23, 2007

Device Proprietary Name: Ash Advance™ Hemodialysis Catheter and Procedure Kit
Classification Name: Catheter, Hemodialysis, Implanted
Device Product Code: MSD

Predicate Device(s): The Ash Advance™ Hemodialysis Catheter and Procedure Kit is substantially equivalent to the following devices:

Device Name	Manufacturer	510(k) No.
Kendall/Tyco Healthcare Mahurkar MAXID™ Cuffed Dual Lumen Catheter System	Tyco/Kendall	K002901, cleared 3/28/2001
*med*Comp® Split-Cath® II/III Hemodialysis Catheter	*med*Comp®	K040318, cleared 2/3/2005
AngioDynamics® Dynamic Flow™ Chronic Hemodialysis Catheter and Procedure Kit, *med*Comp® Excell™/Dynamic Flow Split-Tip Catheter	AngioDynamics® *med*Comp®	K040402, cleared 3/19/2004 K040992, cleared 7/29/2004

Device Description:
The Ash Advance™ Hemodialysis Catheter and Procedure Kit is a dual lumen, 15FR catheter available in multiple lengths. The catheter lumens are D-shaped and made from radiopaque Carbothane. The distal end design is a fixed length split-tip, without side-holes. The distal venous lumen extends past the arterial lumen, and includes a guidewire slit for insertion by the optional guidewire placement technique. The proximal device contains a fixed polyester cuff, an integrated hub, suture wing, and extension set with color coded occlusion clamps and luer connectors (red and blue for the arterial and venous lumens respectively). The lumen priming volumes are printed on the clamps. The procedure kit includes the necessary accessories to correctly insert the catheter.

Statement of Intended Use:
The Ash Advance™ Hemodialysis Catheter and Procedure Kit is indicated for use in attaining long-term vascular access for hemodialysis and apheresis. It may be inserted percutaneously and is primarily placed in the internal jugular vein of an adult patient. This catheter is indicated for > 30 days long-term placement.

Discussion of Nonclinical Tests:
The safety and performance of the Ash Advance™ Hemodialysis Catheter and Procedure Kit have been substantiated through extensive non-clinical testing, including tensile strength, joint strength, leakage, flow rate, kit component compatibility.

Results of testing show that the Ash Advance™ Hemodialysis Catheter and Procedure Kit can reliably perform as a conventional hemodialysis catheter for obtaining blood access for hemodialysis and apheresis. No new questions of safety or effectiveness have been raised.

Substantial Equivalence:
The Ash Advance™ Hemodialysis Catheter and Procedure Kit product information, technological comparison to predicate products, and test results demonstrate that the Ash Advance™ Hemodialysis Catheter and Procedure Kit is safe and performs as intended. The Ash Advance™ Hemodialysis Catheter and Procedure Kit is substantially equivalent to the currently marketed predicate devices with respect to intended use, materials, technological characteristics, performance, insertion method, anatomical location, kit components, and labeling.

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

JUN 26 2007

Mr. Roland Winger
President, Clinical and Product Development
Ash Access Technology, Inc.
3601 Sagamore Parkway North, Suite B
LAFAYETTE IN 47904

Re: K070572
Trade/Device Name: Ash™ Advance Hemodialysis Catheter and Procedure Kit
Regulation Number: 21 CFR §876.5540
Regulation Name: Blood access device and accessories
Regulatory Class: III
Product Code: MSD
Dated: June 12, 2007
Received: June 13, 2007

Dear Mr. Winger:

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). You may, therefore, market the device, subject to the general controls provisions of the Act. However, you are responsible to determine that the medical devices you use as components in the kit have either been determined as substantially equivalent under the premarket notification process (Section 510(k) of the act), or were legally on the market prior to May 28, 1976, the enactment date of the Medical Device Amendments. *Please note:* If you purchase your device components in bulk (i.e., unfinished) and further process (e.g., sterilize) you must submit a new 510(k) before including these components in your kit. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, and 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 (21 CFR Part 807); 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 the labeling regulation, 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). 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,

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

Enclosure

K070572

4. INDICATIONS FOR USE STATEMENT

Indications for Use

510(k) Number (if known): ~~not yet assigned~~ K070572

Device Name: Ash Advance™ Hemodialysis Catheter and Procedure Kit

Indications for Use: The Ash Advance™ Hemodialysis Catheter and Procedure Kit is indicated for use in attaining long-term vascular access for hemodialysis and apheresis.
It may be inserted percutaneously and is primarily placed in the internal jugular vein of an adult patient. This catheter is indicated for > 30 days long-term placement.

Prescription Use ✓ (Part 21 CFR 801 Subpart D) AND/OR Over-The-Counter Use _____ (21 CFR 801 Subpart C)
Concurrence of CDRH, Office of Device Evaluation (ODE)

(Division Sign-Off)
Division of Reproductive, Abdominal, and Radiological Devices
510(k) Number K070572