510(K) SUMMARY

Date Prepared: June 14, 2007
Submitter: Medtronic, Inc.
Cardiac Rhythm Disease Management
710 Medtronic Parkway
Minneapolis, MN 55432-5604
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Proprietary Name: Reveal XT Insertable Cardiac Monitor
Reveal XT Patient Assistant
Common Name: Insertable Cardiac Monitor
Device Classification: Class II, 21 CFR 870.1025, Arrhythmia
detector and alarm
Product Code: DSI

Summary of Substantial Equivalence

The intended use, design, materials and performance of the Reveal XT Insertable
Cardiac Monitor (Model 9529) are substantially equivalent to the following
predicate devices:

- Medtronic Reveal Plus (Model 9526) ILR - K994331, Cleared 21 January
  2000/K003667, Cleared 14 February 2001
- Instrumedix King of Hearts Express AF Recorder - K020825, Cleared 05 April
  2002
- Novacor Vista Plus Holter Recorder - K042108, Cleared 19 January 2005
- IM Systems Actitrac Activity Monitor - K992410, Cleared 15 October 1999
- Invivo Corporation Model 3160 MRI Patient Monitor (MRI compatible
  multiparameter patient monitor) - K053462, Cleared 18 January 2005
The intended use, design, materials and performance of the Reveal XT Patient Assistant (Model 9539) are substantially equivalent to the following predicate devices.

- Medtronic Model 6191 Patient Activator - K994331, Cleared 21 January 2000
- Instrumediix King of Hearts Express AF Recorder - K020825, Cleared 05 April 2002/ K003667, Cleared 14 February 2001

Device Description

The Reveal XT Model 9529 Insertable Cardiac Monitor (ICM) is designed to automatically record the occurrence of arrhythmias in a patient. Arrhythmia may be classified as atrial tachyarrhythmia/atrial fibrillation (AT/AF), bradyarrhythmia, asystole, or (last) ventricular tachyarrhythmia. The Reveal XT ICM provides storage of ECG and marker channels during patient-activated and automatically-detected (auto-activated) events. Auto activation may help to detect abnormal heart rhythms in patients who may not activate/trigger the ICM.

The Reveal XT ICM Model 9529 is a small, leadless device that is typically implanted under the skin, in the chest. Two electrodes on the body of the device continuously monitor the patient’s subcutaneous ECG.

The Reveal XT Patient Assistant Model 9539 is a hand-held, battery-operated telemetry device that enables the patient to start recording cardiac information in the Reveal XT ICM after experiencing symptoms of a possible cardiac event. A query function enables the patient to check his or her device and receive notification when an arrhythmia has occurred or when the device status has changed. The Reveal XT Patient Assistant query function enables the patient to check the status of physician-programmed parameters.

Indications for Use

The Reveal XT Insertable Cardiac Monitor is an implantable patient-activated and automatically-activated monitoring system that records subcutaneous ECG and is indicated in the following cases:

- patients with clinical syndromes or situations at increased risk of cardiac arrhythmias
- patients who experience transient symptoms that may suggest a cardiac arrhythmia

The Patient Assistant is intended for unsupervised patient use away from a hospital or clinic. The Patient Assistant activates one or more of the data management features in the Reveal Insertable Cardiac Monitor:
• To verify whether the implanted device has detected a suspected arrhythmia or
device related event.

• To initiate recording of cardiac event data in the implanted device memory.

**Technological Characteristics**

Intended use, design, materials, performance and technological characteristics are
substantially equivalent to the predicate devices referenced.

**Summary of Testing**

Device verification testing was performed to demonstrate the Reveal XT Model
9529 Insertable Cardiac Monitor and Reveal XT Patient Assistant Model 9539
meet established performance criteria and to support equivalency to the reference
predicate devices. Electromagnetic compatibility (EMC), electrical safety,
component, environmental handling, sterilization, firmware, MRI compatibility,
and sensing and detection performance validation testing were completed for the
Reveal XT Model 9529 Insertable Cardiac Monitor. Functional and mechanical
performance testing, firmware testing and usability testing was completed for the
Reveal XT Patient Assistant Model 9539. System verification and validation and
packaging testing were also completed. The results of the testing indicate that the
Reveal XT Insertable Cardiac Monitor Model 9529 and Reveal XT Patient
Assistant Model 9539 perform as intended and are safe for their intended use.

Biocompatibility testing was not required because blood-contacting materials of the
Reveal XT Model 9529 Insertable Cardiac Monitor implanted device are similar to
the predicate device, the Medtronic Reveal Plus ILR.

The Reveal XT Model 9529 Insertable Cardiac Monitor will be sterilized using a
validated EtO sterilization process.

**Conclusion**

Medtronic considers the Reveal XT Insertable Cardiac Monitor system to be
substantially equivalent to legally marketed predicate devices through the data and
information presented. No safety or effectiveness issues were identified.
Medtronic, Inc.
c/o Ms. Michelle Nivala
Regulatory Affairs Specialist
Cardiac Rhythm Disease Management
8200 Coral Sea Street NW
Mounds View, MN 55112

Re: K071641
Trade/Device Name: Reveal XT (Model 9529) and Reveal Patient Assistant (Model 9539)
Regulation Number: 21 CFR 870.1025
Regulation Name: Arrhythmia detector and alarm
Regulatory Class: Class II (two)
Product Code: DSI
Dated: November 1, 2007
Received: November 2, 2007

Dear Ms. Nivala:

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 Center for Devices and Radiological Health’s (CDRH’s) Office of Compliance at (240) 276-0120. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH’s Office of Surveillance and Biometric’s (OSB’s) Division of Postmarket Surveillance at 240-276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at 240-276-3464. 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,

[Signature]

Brain D. Zuckerman, M.D.
Director
Division of Cardiovascular Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure
INDICATIONS FOR USE

510(k) Number (if known): K071641

Device Name: Reveal XT Insertable Cardiac Monitor and Reveal XT Patient Assistant

Indications for Use: The Reveal XT Insertable Cardiac Monitor is an implantable patient-activated and automatically-activated monitoring system that records subcutaneous ECG and is indicated in the following cases:

- patients with clinical syndromes or situations at increased risk of cardiac arrhythmias
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The Reveal XT Patient Assistant is intended for unsupervised patient use away from a hospital or clinic. The Patient Assistant activates one or more of the data management features in the Reveal Insertable Cardiac Monitor:

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- To initiate recording of cardiac event data in the implanted device memory.

Prescription Use X AND/OR Over-The-Counter Use

(Part 21 CFR 801 Subpart D) (21 CFR 807 Subpart C)

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

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