BÂRRX Medical’s Instructions for Use changes for HALO\(^{360^\circ}\) Coagulation Catheter and HALO\(^{360^\circ}\) Coagulation Catheter

Submitter’s Name, Address, Telephone Number, Contact Person and Date Prepared:

BÂRRX Medical Inc.
540 Oakmead Parkway
Sunnyvale, CA 94085

Phone: (408) 328-7302
Facsimile: (408) 328-7395

Contact Person: Viorica Filimon
Date Prepared: February 27, 2008

Name of device and Name/Address of Sponsor:

HALO\(^{360^\circ}\) Coagulation Catheter
HALO\(^{360^\circ}\) Coagulation Catheter

BÂRRX Medical Inc.
540 Oakmead Parkway
Sunnyvale, CA 94085

Common or Usual Name(s):
Electrosurgical Coagulation Catheter

Classification Name:

Product code: GEI
CFR Section: 878.4400 Electrosurgical, cutting & coagulation & accessories
Device Class: II
Classification panel: General & Plastic Surgery
Predicate Device(s)

K071543 HALO$^{360}$ Coagulation Catheter-BÁRRX Medical Inc.
K062225 HALO$^{360}$ Coagulation Catheter-BÁRRX Medical Inc.

Intended Use / Indications for Use

The HALO$^{360}$ Coagulation Catheter is intended for use in the coagulation of bleeding and non-bleeding sites in the gastrointestinal tract.

The HALO$^{360}$ Coagulation Catheter is indicated for use in the coagulation of bleeding and non-bleeding sites in the gastrointestinal tract including but not limited to, the esophagus. Indications include Esophageal Ulcers, Mallory-Weiss tears, Arteriovenous Malformations, Angioma, Barrett’s Esophagus, Dieulafoy Lesions, and Angiodysplasia.

Technological Characteristics

The HALO$^{360}$ Coagulation System consists of the HALO$^{360}$ Energy Generator with a disposable single-use ablation catheter HALO$^{360+}$ Coagulation Catheter and HALO$^{360}$ Coagulation Catheter, a HALO$^{360}$ Sizing Balloon, an output cable, and an optional footswitch. The HALO$^{360}$ Coagulation Catheter comprises models 31041-XX and 32041-XX equivalent in performance and mode of operation. There are no changes to the design, principle of operations for any of the products included in the HALO$^{360}$ System.

Substantial Equivalence

The HALO$^{360+}$ Coagulation Catheter model 32041-XX and HALO$^{360}$ Coagulation Catheter model 31041-XX did not undergo any product or process changes, and have the same intended use, indications for use, technological characteristics, and principles of operation. This submission addresses instructions for use changes which consist of the following:

1) Adding a contraindication “Eosinophilic esophagitis”
2) Provide clarifications to the instructions for use to improve the use of the device

All these changes are not affecting the use of the device or its performance and did not raise questions regarding safety and efficacy. Thus the devices are equivalent.
Dear Viorica Filimon:

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) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR 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,

Mark N. Melkerson
Director
Division of General, Restorative and Neurological Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure
Indications for Use Statement

510(k) Number (if known): K080557

Device Name: HALO® Coagulation Catheter and HALO®+ Coagulation Catheter

Indications for Use:

The HALO® Coagulation Catheter is intended for use in the coagulation of bleeding and non-bleeding sites in the gastrointestinal tract.

The HALO® Coagulation Catheter is indicated for use in the coagulation of bleeding and non-bleeding sites in the gastrointestinal tract including but not limited to, the esophagus. Indications include Esophageal Ulcers, Mallory-Weiss tears, Arteriovenous Malformations, Angiomata, Barrett's Esophagus, Dieulafoy Lesions, and Angiodysplasia.

Prescription Use _X_ AND/OR Over-The-Counter Use
(Part 21 C.F.R. 801 Subpart D) (21 C.F.R. 807 Subpart C)

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

Concurrence of CDRH, Office of Device System Evaluation (ODE)

Page 1 of 1

Division Sign-Off
Division of General, Restorative, and Neurological Devices

510(k) Number K08557