



SURGICAL INNOVATION &gt;&gt; VALUE DRIVEN

SEP 30 2009

**510(k) Summary**

**Submitter:** Parcus Medical, LLC  
839 South Neenah Ave.  
Sturgeon Bay, WI 54234

**Company Contact:** Barton Bracy  
Phone: (920) 746-2972  
Fax: (920) 746-8665

**Date Prepared:** April 13, 2009

**Trade Name:** Parcus PEEK CF Interference Screw

**Common Name:** Interference Screw

**Classification Name:** Fastener, Fixation, Non-Degradable, Soft Tissue  
21 CFR 888.3040 – Product Code HWC and MBI

**Predicate Devices:**

- Parcus Titanium Interference Screws (K083619)
- Smith & Nephew PEEK Interference Screws (K083226)

**Device Description:**

The Parcus PEEK CF Interference Screw is a cannulated, threaded, tapered fastener for use in interference fixation of ligaments and tendons in patients requiring ligament or tendon repair. The device is made from Carbon Fiber Reinforced Polyetheretherketone (PEEK CF) and is available in sizes ranging from 7-12mm in diameter and 20-35mm in length.

**Intended Use:**

The Parcus PEEK CF Interference Screw is indicated for use in the fixation of ligaments and tendons in patients requiring ligament or tendon repair.

**Substantial Equivalence Summary:**

The Parcus PEEK CF Interference Screws are essentially the same as the Parcus Titanium Interference Screws aside from the difference in material.

The only difference between the materials for the Parcus PEEK CF Interference Screw and the Smith & Nephew PEEK Interference Screw is that the Parcus Interference Screw is carbon reinforced. Carbon fibers have been used clinically for more than 20 years as a reinforcement component for implant materials without obvious leachable-related biocompatibility reactions.



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Furthermore, there are currently several medical device implants on the market made from PEEK CF (e.g. Zimmer Spine BAK® Vista® Radiolucent Interbody Fusion System and the Depuy Spine OCELOT™ Stackable Cage System).

Therefore the Parcus PEEK CF Interference Screw is substantially equivalent to the predicate devices listed above in which the basic features and intended uses are the same. Any differences between the PEEK CF Interference Screw and the predicate devices are considered minor and do not raise questions concerning safety and effectiveness.

**Summary Performance Data:**

The pull out strength and insertion torque was measured for the smallest (7mm) and largest (12mm) Parcus PEEK CF Interference Screws as well as an intermediate size. Test results were compared to the results of the corresponding size of Parcus Titanium Interference Screws and demonstrated substantial equivalence.



DEPARTMENT OF HEALTH & HUMAN SERVICES

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Food and Drug Administration  
10903 New Hampshire Avenue  
Document Mail Center – WO66-0609  
Silver Spring, MD 20993-0002

SEP 30 2009

Parcus Medical, LLC  
c/o Mr. Barton Bracy  
VP Marketing and Product Development  
839 South Neenah Avenue  
Sturgeon Bay, Wisconsin 54235

Re: K091093  
Trade/Device Name: Parcus PEEK CF Interference Screw  
Regulation Number: 21 CFR 888.3040  
Regulation Name: Smooth or threaded metallic bone fixation fastener  
Regulatory Class: Class II  
Product Code: HWC, MBI  
Dated: September 23, 2009  
Received: September 30, 2000

Dear Mr. Bracy:

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

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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.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to <http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

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/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,



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

Enclosure

### Indications for Use

510(k) Number (if known): K091093

Device Name: Parcus PEEK CF Interference Screw

#### Indications for Use:

The Parcus PEEK CF Interference Screw is indicated for use in the fixation of ligaments and tendons in patients requiring ligament or tendon repair.

Prescription Use X  
(Part 21 CFR 801 Subpart D)

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 Device Evaluation (ODE)

Jonathan J. for MXM  
(Division Sign-Off)  
Division of Surgical, Orthopedic,  
and Restorative Devices

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