

SPECIAL 510(k): Device Modification OIR Decision Memorandum

To: THE FILE

RE: DOCUMENT NUMBER K170492

This 510(k) submission contains information/data on modifications made to the SUBMITTER'S own Class II, Class III or Class I devices requiring 510(k). The following items are present and acceptable (delete/add items as necessary):

1. The name and 510(k) number of the SUBMITTER'S previously cleared device. (For a preamendments device, a statement to this effect has been provided.) xTAG CYP2D6 Kit v3, k130189
2. Submitter's statement that the **INDICATION/INTENDED USE** of the modified device as described in its labeling **HAS NOT CHANGED** along with the proposed labeling which includes instructions for use, package labeling, and, if available, advertisements or promotional materials (labeling changes are permitted as long as they do not affect the intended use).
3. A description of the device **MODIFICATION(S)**, including clearly labeled diagrams, engineering drawings, photographs, user's and/or service manuals in sufficient detail to demonstrate that the **FUNDAMENTAL SCIENTIFIC TECHNOLOGY** of the modified device **has not changed**.

This change was for

- i. Replacing the Platinum *Tfi* Enzyme System with the TaKaRa Titanium Taq SP DNA Polymerase (TiTaq)
 - ii. Modifying the negative control threshold for the 2549A>del (*3) variation
 - iii. Modifying the duplication (DUP) and not detected (ND) call thresholds
 - iv. Modification to software allelic ratio (AR) threshold values
 - v. Addition of 124G>A SNP to the *5/*5 (homozygous deletion) exemption list
 - vi. Changes to device labeling to include updated information related to allele frequency and background information related to genotype-phenotype correlations
4. **Comparison Information** (similarities and differences) to applicant's legally marketed predicate device including, labeling, intended use, physical and technological characteristics.
5. **A Design Control Activities Summary** which includes:
 - a) Identification of Risk Analysis method(s) used to assess the impact of the modification on the device and its components, and the results of the analysis
 - b) Based on the Risk Analysis, an identification of the verification and/or validation activities required, including methods or tests used and acceptance criteria to be applied

The labeling for this modified subject device has been reviewed to verify that the indication/intended use for the device is unaffected by the modification. In addition, the submitter's description of the particular modification(s) and the comparative information between the modified and unmodified devices demonstrate that the fundamental scientific technology has not changed. The submitter has provided the design control information as specified in The New 510(k) Paradigm and on this basis, I recommend the device be determined substantially equivalent to the previously cleared (or their preamendment) device.