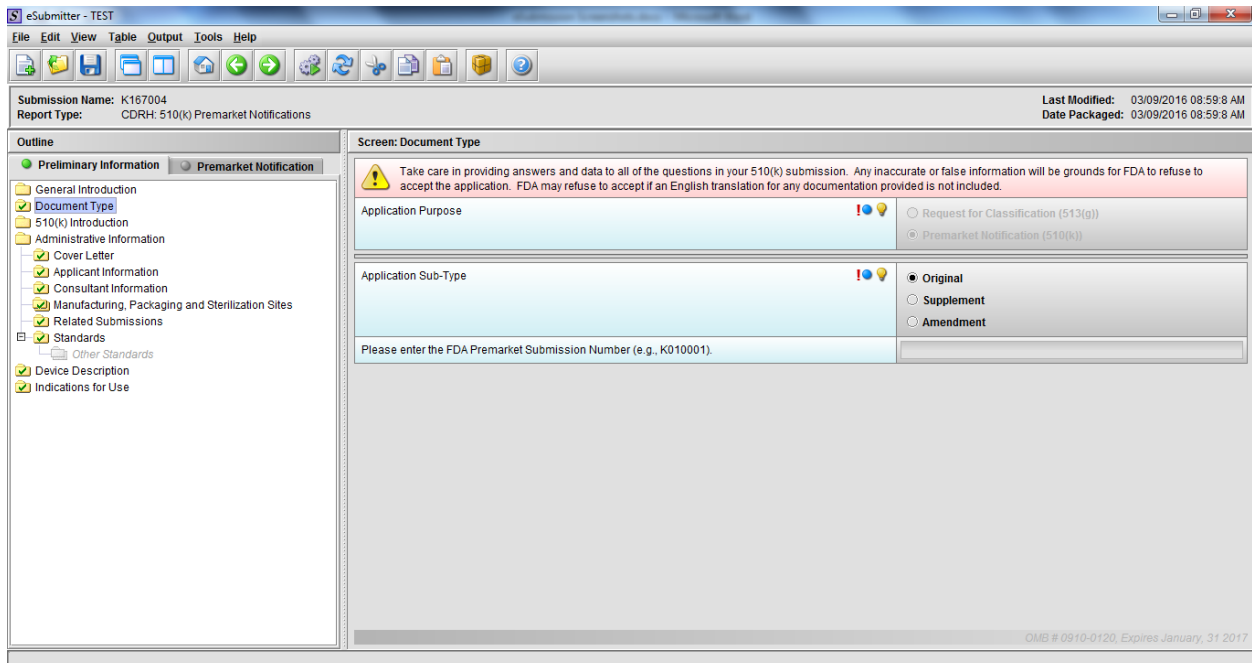
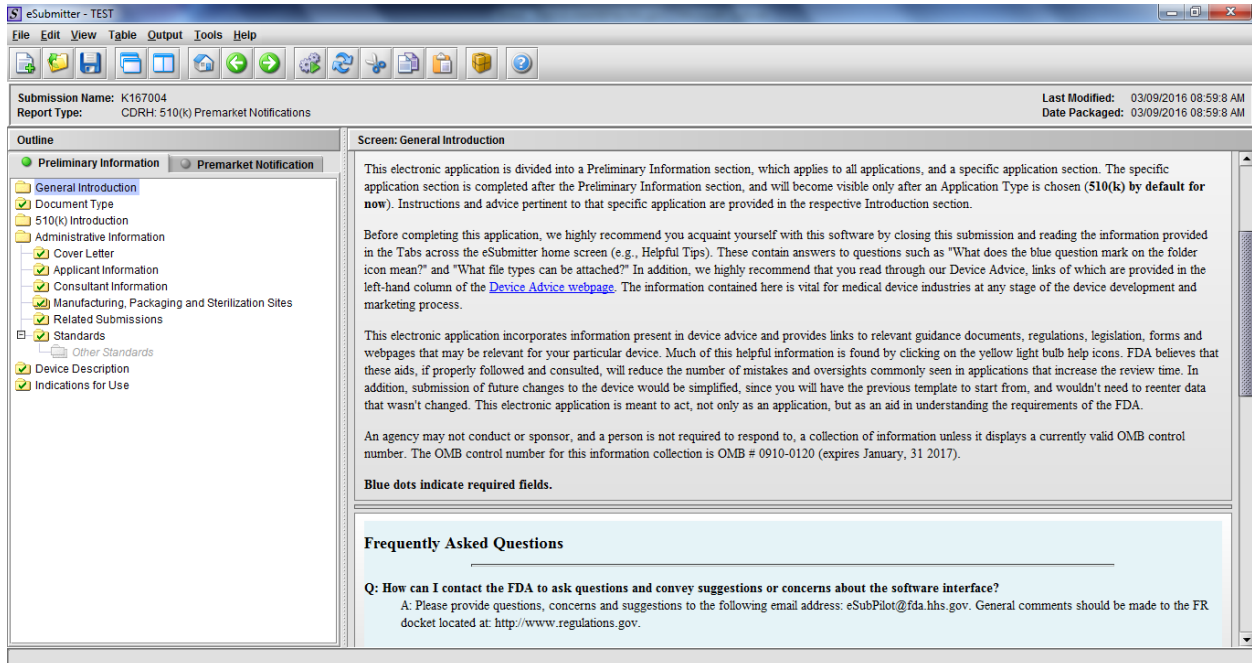


Note: Certain sections aren't needed depending on how certain questions are answered. For example, the sterilization section, biocompatibility section, software section, etc aren't necessary if the applicants indicate the device isn't sterilized, doesn't contact the patient, or doesn't use software, respectively. The Verification and Validation section on page 25 – 26 below is only needed for Special 510(k)s. Other sections will also not be required depending on how certain questions are answered (e.g., labeling, performance testing, clinical testing, etc).



eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
- Premarket Notification
  - General Introduction
  - Document Type
  - 510(k) Introduction
  - Administrative Information
    - Cover Letter
    - Applicant Information
    - Consultant Information
    - Manufacturing, Packaging and Sterilization Sites
    - Related Submissions
  - Standards
    - Other Standards
  - Device Description
  - Indications for Use

Screen: 510(k) Introduction

A **Premarket Notification (510(k))** is required for each person who wants to market in the U.S., a Class I, II, and III device intended for human use, except when: a) a Premarket Approval (PMA) is required, or b) the device is exempt from 510(k) requirements of the Federal Food, Drug, and Cosmetic Act (the Act) and does not exceed the limitations of exemptions in 21 CFR XXX.9, where XXX refers to Parts 862-892, of the device classification regulation chapters (e.g., [21 CFR 862.9](#), [21 CFR 864.9](#)). There is no 510(k) form, however, [21 CFR 807.87](#) describes requirements for a 510(k) submission. Before marketing a device, each submitter must receive an order, in the form of a letter, from FDA which finds the device to be substantially equivalent (SE) and states that the device can be marketed in the U.S. This order "clears" the device for commercial distribution.

Submitters must compare their device to one or more similar legally marketed devices and make and support their substantial equivalency claims. A legally marketed device, as described in [21 CFR 807.92\(a\)\(3\)](#), is a device that was legally marketed prior to May 28, 1976 (preamendments device), for which a PMA is not required, or a device which has been reclassified from Class III to Class II or I, or a device which has been found SE through the 510(k) process. The legally marketed device(s) to which equivalence is drawn is commonly known as the "predicate." Although devices recently cleared under 510(k) are often selected as the predicate to which equivalence is claimed, any legally marketed device may be used as a predicate. Legally marketed also means that the predicate cannot be one that is in violation of the Act.

Until the submitter receives an order declaring a device SE, the submitter may not proceed to market the device. Once the device is determined to be SE, it can then be marketed in the U.S. The SE determination is usually made within 90 days and is made based on the information submitted by the submitter.

Please note that FDA does not perform 510(k) pre-clearance facility inspections. The submitter may market the device immediately after 510(k) clearance is granted. The manufacturer should be prepared for an FDA Quality system ([21 CFR 820](#)) inspection at any time after 510(k) clearance.

**If you made a change to a device you own**, and you are unsure whether the change necessitates a new premarket notification, please consult the following document entitled "[Deciding When to Submit a 510\(k\) for a Change to an Existing Device](#)". If the change does require a new premarket notification, but you will not be changing the cleared indications for use or making a significant technology change, submitting a Special 510(k) may be appropriate. An example of a significant technology change is a change that would require new performance testing; most changes that require bench, animal, or clinical data to ensure safety and effectiveness are not appropriate for a Special 510(k). Only in very rare circumstances will animal and/or clinical data be permitted in a Special 510(k). Please consult the above guidance document entitled "[Deciding When to Submit a 510\(k\) for a Change to an Existing Device](#)" for the definition and examples of a "significant technology change". A Special 510(k) brings many benefits, such as a shorter review time and fewer data requirements. For guidance on determining whether a Special 510(k) is appropriate, please consult the guidance document entitled "[The New 510\(k\) Paradigm: Alternate Approaches to Demonstrating Substantial Equivalence in Premarket Notifications](#)". Please take note that submitting a Special 510(k) when a Traditional 510(k) is required will delay the review of

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File Edit View Table Output Tools Help





Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
- Premarket Notification
  - General Introduction
  - Document Type
  - 510(k) Introduction
  - Administrative Information
    - Cover Letter
    - Applicant Information
    - Consultant Information
    - Manufacturing, Packaging and Sterilization Sites
    - Related Submissions
  - Standards
    - Other Standards
  - Device Description
  - Indications for Use

Screen: Cover Letter

Upload Cover Letter

File Attachment     Cover Letter (C:\Users\PLA\Documents\Projects\Submission\Pilot 1\Test Attachments\Cover Letter.pdf)

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

**Outline**

- Preliminary Information
- Premarket Notification
  - General Introduction
  - Document Type
  - 510(k) Introduction
  - Administrative Information
    - Cover Letter
    - Applicant Information
    - Consultant Information
    - Manufacturing, Packaging and Sterilization Sites
    - Related Submissions
  - Standards
    - Other Standards
  - Device Description
  - Indications for Use

**Screen: Applicant Information**

Using the Contact and Address books found under the Tools menu, and the "Copy to..." and "Copy from..." options to the right of the question will simplify the data entry of often used contact and address information.

Submitter, Applicant or Sponsor Information

**Contact**

Title (e.g., Mr., Ms.): Mr.

First/Given Name: Patrick

Middle Name: Langdon

Last Name: Axtell

Occupation Title: Tester

Email Address: patrick.axtell@fda.hhs.gov

**Address**

Establishment Name: FDA

Division Name: Division Name

Country:  United States of America  Other (select below)

Address - Line 1: My office line 1

Address - Line 2: My office line 2

City: Silver Spring

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

**Outline**

- Preliminary Information
- Premarket Notification
  - General Introduction
  - Document Type
  - 510(k) Introduction
  - Administrative Information
    - Cover Letter
    - Applicant Information
    - Consultant Information
    - Manufacturing, Packaging and Sterilization Sites
    - Related Submissions
  - Standards
    - Other Standards
  - Device Description
  - Indications for Use

**Screen: Applicant Information**

City: Silver Spring

State, Province, or Territory: Maryland

Post Office or Zip Code: 20993-0001

**Phone Numbers**

Telephone number: (301) 796-6462 Ext: \_\_\_\_\_

Fax number: ( ) - : -

**Reference Numbers (for the Establishment Name specified above)**

FDA Establishment Identifier (FEI): \_\_\_\_\_

Central File Number (CFN): \_\_\_\_\_

D&B D-U-N-S Number: \_\_\_\_\_

Registration Number: \_\_\_\_\_

Owner/Operator Number: \_\_\_\_\_

[Help Finding Registration and Owner/Operator Numbers for Devices](#)

[Help Finding Blood Establishment Registration Numbers](#)

Is there a consultant / correspondent for this application?  Yes  No

Is there a manufacturer, packager, or sterilizer at an address different from the above?  Yes  No

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline: Preliminary Information **Premarket Notification**

- General Introduction
- Document Type
- 510(k) Introduction
- Administrative Information
  - Cover Letter
  - Applicant Information
  - Consultant Information**
  - Manufacturing, Packaging and Sterilization Sites
  - Related Submissions
- Standards
  - Other Standards
- Device Description
- Indications for Use

Screen: Consultant Information

Using the Contact and Address books found under the Tools menu, and the "Copy to..." and "Copy from..." options to the right of the question will simplify the data entry of often used contact and address information.

Correspondent or Consultant Information

**Contact**

Title (e.g., Mr., Ms.):

First/Given Name: Nelson

Middle Name:

Last Name: Anderson

Occupation Title:

Email Address: Nelson.Anderson@fda.hhs.gov

**Address**

Establishment Name: FDA

Division Name:

Country:  United States of America  Other (select below)

Address - Line 1: My office line 1

Address - Line 2: My office line 2

City: Silver Spring

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline: Preliminary Information **Premarket Notification**

- General Introduction
- Document Type
- 510(k) Introduction
- Administrative Information
  - Cover Letter
  - Applicant Information
  - Consultant Information**
  - Manufacturing, Packaging and Sterilization Sites
  - Related Submissions
- Standards
  - Other Standards
- Device Description
- Indications for Use

Screen: Consultant Information

Address - Line 1: My office line 1

Address - Line 2: My office line 2

City: Silver Spring

State, Province, or Territory: Maryland

Post Office or Zip Code: 20993-\_\_\_\_\_

**Phone Numbers**

Telephone number: (301) 796-6772 Ext: \_\_\_\_\_

Fax number: ( ) - -

**Reference Numbers (for the Establishment Name specified above)**

FDA Establishment Identifier (FEI): 1234567

Central File Number (CFN): 1234567

D&B D-U-N-S Number: 123456789

Registration Number: 1234567

Owner/Operator Number: 1234567

[Help Finding Registration and Owner/Operator Numbers for Devices](#)

[Help Finding Blood Establishment Registration Numbers](#)

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline: Preliminary Information Premarket Notification

- General Introduction
- Document Type
- 510(k) Introduction
- Administrative Information
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  - Applicant Information
  - Consultant Information
  - Manufacturing, Packaging and Sterilization Sites
  - Related Submissions
- Standards
  - Other Standards
- Device Description
- Indications for Use

Screen: Manufacturing, Packaging and Sterilization Sites

Manufacturer, Packager, Sterilizer Information

Item: 1 Details of Selected Site

At least one Site Operation must be designated as 'Yes'.

Site Operations

Manufacturer	Yes
Contract Manufacturer	No
Contract Sterilizer	No
Repackager / Relabeler	No

Contact Information

Contact

Title (e.g., Mr., Ms.):	
First/Given Name:	Allison
Middle Name:	
Last Name:	Smith
Occupation Title:	

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline: Preliminary Information Premarket Notification

- General Introduction
- Document Type
- 510(k) Introduction
- Administrative Information
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  - Applicant Information
  - Consultant Information
  - Manufacturing, Packaging and Sterilization Sites
  - Related Submissions
- Standards
  - Other Standards
- Device Description
- Indications for Use

Screen: Manufacturing, Packaging and Sterilization Sites

Manufacturer, Packager, Sterilizer Information

Item: 1 Details of Selected Site

State, Province, or Territory: Colorado

Post Office or Zip Code: 21122-\_\_\_\_

Phone Numbers

Telephone number: (240) 867-5309 Ext: \_\_\_\_

Fax number: (\_\_\_\_) \_\_\_\_-\_\_\_\_

Reference Numbers (for the Site Name specified above)

FDA Establishment Identifier (FEI):	
Central File Number (CFN):	
D&B D-U-N-S Number:	
Registration Number:	
Owner/Operator Number:	

[Help Finding Registration and Owner/Operator Numbers for Devices](#)

[Help Finding Blood Establishment Registration Numbers](#)

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004  
Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 08:59:8 AM  
Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
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    - Related Submissions
  - Standards
    - Other Standards
  - Device Description
  - Indications for Use

Screen: Related Submissions

Are there prior related submissions for the subject device(s)? Prior related submissions of the subject device are submissions for which FDA provided feedback related to the data or information needed to support substantial equivalence (e.g., submission numbers for Pre-Submission, IDE, prior not substantially equivalent (NSE) determination, prior submission that was deleted or withdrawn).  Yes

If information related to Substantial Equivalence was provided by FDA in any prior submission(s), please provide the prior submission number(s) (regardless of outcome).

3 of 50 items in the list (1 required)

K010001
Q010001
Q010002

Please upload copies of prior FDA feedback (e.g., letter, meeting minutes) regarding issues related to a determination of substantial equivalence. Please also ensure the uploaded documentation identifies the location in the submission where these issues are addressed.

1 item in the list

Title	Name	Date	Size	Pat
Animal Study 1	Animal Study 1.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

If there were no prior related submissions for the subject device(s), please state this here.

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004  
Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 08:59:8 AM  
Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
- Premarket Notification
  - General Introduction
  - Document Type
  - 510(k) Introduction
  - Administrative Information
    - Cover Letter
    - Applicant Information
    - Consultant Information
    - Manufacturing, Packaging and Sterilization Sites
    - Related Submissions
  - Standards
    - Other Standards
  - Device Description
  - Indications for Use

Screen: Standards

Please list the FDA recognized standards used in your submission (if any). If only certain sections were used, cite these in the Details box below per each standard. In addition, if there were any deviations with the cited standards, please describe these deviations in the Details box below.

0 items in the list

Title and Reference Number	Year	Category	Organization
----------------------------	------	----------	--------------

Standards details

Were any Non-FDA recognized standards used (standards not found and added within the above list)?

OMB # 0910-0120, Expires January, 31 2017





eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004  
Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 08:59:8 AM  
Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
- Premarket Notification
- General Introduction
- Document Type
- 510(k) Introduction
- Administrative Information
  - Cover Letter
  - Applicant Information
  - Consultant Information
  - Manufacturing, Packaging and Sterilization Sites
  - Related Submissions
- Standards
  - Other Standards
- Device Description
- Indications for Use

Screen: Device Description

Step 3 Device Description

Please provide a Device Description Summary below, and ensure it includes an explanation of how the device functions, the scientific concepts that form the basis for the device, and the significant physical and performance characteristics of the device, such as device design, material used, and physical properties. If you choose to have eSubmitter produce a 510K summary for you at the end of this template (in the Administrative Documentation page), you must include this information, in accordance with 21 CFR 807.92(a)(4). If a 510(k) Summary will be produced, the information you enter below will be made publicly available on our website if your device is cleared.

ONLY ENTER NONCONFIDENTIAL INFORMATION IN THE DEVICE DESCRIPTION SUMMARY BELOW.

Device Description Summary

Device Description Documentation

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004  
Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 08:59:8 AM  
Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
- Premarket Notification
- General Introduction
- Document Type
- 510(k) Introduction
- Administrative Information
  - Cover Letter
  - Applicant Information
  - Consultant Information
  - Manufacturing, Packaging and Sterilization Sites
  - Related Submissions
- Standards
  - Other Standards
- Device Description
- Indications for Use

Screen: Device Description

Device Description Documentation

Title	Name	Date	Size	Pat
Device Description Details	Device Description Details...	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

Device Pictures, Illustrations, Schematics, and/or Diagrams. Attach a justification if the device does not have a physical form.

Title	Name	Date	Size	Pat
Device Pictures and Schematics	Device Pictures and Schem...	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

Step 4 Device Components/Accessories/System

Is the device intended to be marketed with multiple components or accessories?  No

- List all of the components and accessories to be marketed with the subject device.

0 of 10 items in the list



eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

**Outline**

- Preliminary Information
- Premarket Notification
- General Introduction
- Document Type
- 510(k) Introduction
- Administrative Information
  - Cover Letter
  - Applicant Information
  - Consultant Information
  - Manufacturing, Packaging and Sterilization Sites
  - Related Submissions
- Standards
  - Other Standards
- Device Description
- Indications for Use

**Screen: Device Description**

Please include a description of each component or accessory (see help text for the information we request be included). Please also provide the submission number if the component or accessory was previously cleared, granted or approved (or a statement that it was not).

Component / Accessory Pictures, Illustrations, Schematics, and/or Diagrams

0 items in the list

Title	Name	Date	Size
-------	------	------	------

**Step 5 Device Regulation Information**

Primary Regulation and Associated Device Product Code(s)

2 items in the list

Product Code	Product Code Name	Device Class	Classification Panel	C.F.R
IPF	STIMULATOR, MUSCLE, POWERED	CLASS II	PHYSICAL MEDICINE	POWERED MUSCLE STIMULAT
NGX	STIMULATOR, MUSCLE, POWERED, FOR MUSCLE CONDITIONING	CLASS II	PHYSICAL MEDICINE	POWERED MUSCLE STIMULAT

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 08:59:8 AM Date Packaged: 03/09/2016 08:59:8 AM

**Outline**

- Preliminary Information
- Premarket Notification
- General Introduction
- Document Type
- 510(k) Introduction
- Administrative Information
  - Cover Letter
  - Applicant Information
  - Consultant Information
  - Manufacturing, Packaging and Sterilization Sites
  - Related Submissions
- Standards
  - Other Standards
- Device Description
- Indications for Use

**Screen: Device Description**

Other Regulations cannot contain a Class III product code unless also designated within the Primary Regulation.

Other Regulations and Associated Device Product Code(s)

1 item in the list

Product Code	Product Code Name	Device Class	Classification Panel	C.F.R
GEI	ELECTROSURGICAL, CUTTING & COAGULATION & ACCESSORIES	CLASS II	GENERAL AND PLASTIC SURGERY	ELECTROSURGICAL CUTTING ACCESSORIES.

Regulation Documentation

GEI is an odd one to add to IPF, but this is just a test you know.

**Step 6 Guidance or Special Controls Adherence**

If you choose to use an alternative approach in comparison to what is stated in the applicable guidance or special controls, please provide a rationale for this alternative approach below.

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/18/2016 08:01:55 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
- Premarket Notification
  - General Introduction
  - Document Type
  - 510(k) Introduction
  - Administrative Information
    - Cover Letter
    - Applicant Information
    - Consultant Information
    - Manufacturing, Packaging and Sterilization Sites
    - Related Submissions
  - Standards
    - Other Standards
  - Device Description
  - Indications for Use

Screen: Indications for Use

The Indications for Use should include a general description of the diseases or conditions that the device will diagnose, treat, prevent, cure, or mitigate, including a description, where appropriate, of the patient population for which the device is intended. The information you enter below will be made publicly available on our website if your device is cleared.

ONLY ENTER NONCONFIDENTIAL INFORMATION IN THE INDICATIONS FOR USE BELOW.

Please provide your Indications for Use below.

This is the indications for use

Prescription (Rx) or Over-the-Counter (OTC)  Both Rx & OTC

Intended Population

Adults (greater than 21 years of age)

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/18/2016 08:01:55 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
      - Sterilization Information
    - Shelf Life
      - Reprocessing, Sterilization and Shelf-Life Documentation
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
    - Software/Firmware
      - Software Description
      - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
        - Bench Testing
        - Animal Testing
        - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation

Screen: Premarket Notification Type

Premarket Notification Type  Traditional  Abbreviated  Special

Does this Abbreviated 510(k) rely on a guidance document and/or special controls, or does it rely on an FDA recognized standard?

There are three types of Premarket Notification 510(k)s that may be submitted to FDA: Traditional, Special, and Abbreviated. The Special and Abbreviated 510(k) methods were developed under the "[New 510\(k\) Paradigm](#)" to help streamline the 510(k) review process.

**Traditional 510(k)**

A Traditional Premarket Notification (510(k)) is a type of premarket submission that is intended to demonstrate that the device to be marketed is at least as safe and effective as a legally marketed device ([21 CFR 807.92\(a\)\(3\)](#)) that does not require PMA. In order to determine if a device is substantially equivalent (SE), FDA considers intended use, design, energy used or delivered, materials, chemical composition, manufacturing process, performance, safety, effectiveness, labeling, biocompatibility, standards, and other characteristics, as applicable.

The purpose and content of a Premarket Notification (510(k)) is described in [21 CFR 807.87](#), the guidance document "[Format for Traditional and Abbreviated 510\(k\)s](#)," and at the website entitled "[How to Prepare a Traditional 510\(k\)](#)".

**Abbreviated 510(k)**

An Abbreviated 510(k) is different from a Traditional 510(k) in that it relies more on the use of guidance documents, special controls, and recognized standards for Substantial Equivalence determinations. An Abbreviated 510(k) submission must include the required elements identified in [21 CFR 807.87](#) (Information required in a premarket notification submission). Under certain conditions, you may not need to submit test data in an abbreviated 510(k).

Device manufacturers may choose to submit an Abbreviated 510(k) when:

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/18/2016 08:01:55 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline: Preliminary Information **Premarket Notification**

- ✓ Premarket Notification Type
  - Substantial Equivalence Comparison
    - ✓ Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - ✓ Reprocessing Information
    - Sterilization Information
    - ✓ Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documentation
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - ✓ Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
    - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation

Screen: Predicate and Reference Devices

Item: 1 Details on the selected Predicate/Reference Device

**Predicate Device**

Is this a Pre-amendment or Exempt device without a submission number?

Predicate Submission Number: K150001

Predicate Device Trade Name: Predicate Trade Name

Predicate Product Code

Product Code	Product Code Name	Device Class	Classification Panel	C.F.R
IPF	STIMULATOR, MUSCLE, POWERED	CLASS II	PHYSICAL MEDICINE	POWERED MUSCLE STIMULAT

1 item in the list

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/18/2016 08:01:55 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline: Preliminary Information **Premarket Notification**

- ✓ Premarket Notification Type
  - Substantial Equivalence Comparison
    - ✓ Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - ✓ Reprocessing Information
    - Sterilization Information
    - ✓ Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documentation
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - ✓ Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
    - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation

Screen: Substantial Equivalence Comparison

Step 1 Information on the Predicate Devices

If the device has different indications for use in comparison to the predicate device(s), provide a rationale of why the differences do not impact safety and effectiveness. In addition, describe why the differences do not constitute a new intended use. If the indications for use are the same, state this in the text box below.

If at the end of this template (in the Administrative Documentation page) you choose to have eSubmitter produce a 510k summary for you, and the Indications are different in comparison to your predicate device(s), you must include the information from 21 CFR 807.92(a)(5) in this rationale. If a 510(k) Summary will be produced, the information you enter below will be made publicly available on our website if your device is cleared.

ONLY ENTER NONCONFIDENTIAL INFORMATION IN THE RATIONALE BELOW.

Rationale for why the different indications for use in comparison to the predicate device(s) do not impact safety and effectiveness.

Problem: Batteries are not being properly reviewed by reviewers, leading to adverse events caused by battery failure. These failures include, but are not limited to: unexpected battery depletion, battery leakage, battery explosion, early battery death.

Solution: A dynamic guide is being produced that helps a reviewer know what device/battery features to look for to ensure the battery is integrated into the device. This guide will also ensure the choice of battery, charging circuitry (if applicable), battery labeling, etc are optimal and safe for the intended use of the device. This guide will be based on standards and experience from battery reviewers, and will use adverse event reports for focusing the questions.

If the device has the same technological characteristics (i.e., design, material, chemical composition, principle of operation, energy source, etc.) as the predicate device(s) identified above, include a summary in the memo box below of the technological characteristics of the new device in comparison to those of the predicate device(s). Or, if the device has different technological characteristics from the predicate device(s), include a summary of how the technological characteristics of the device compare to a legally marketed device(s) identified above.

If at the end of this template (in the Administrative Documentation page) you choose to have eSubmitter produce a 510k summary for you, you must include the information from 21 CFR 807.92(a)(6) in this description. If a 510(k) Summary will be produced, the information you enter below will be made publicly available on our website if your device is cleared.

ONLY ENTER NONCONFIDENTIAL INFORMATION IN THE DESCRIPTION BELOW.

Summary of technological characteristics of the new device in comparison to those of the identified predicate device(s) or legally marketed device(s).

Problem: Batteries are not being properly reviewed by reviewers, leading to adverse events caused by battery failure. These failures include, but are not limited to: unexpected battery depletion, battery leakage, battery explosion, early battery death.

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File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/18/2016 08:01:55 AM Date Packaged: 03/09/2016 08:59:8 AM

**Outline**

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documentation
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
    - Software/Firmware
      - Software Description
      - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
    - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation

**Screen: Substantial Equivalence Comparison**

If the device has the same technological characteristics (i.e., design, material, chemical composition, principle of operation, energy source, etc.) as the predicate device(s) identified above, include a summary in the memo box below of the technological characteristics of the new device in comparison to those of the predicate device(s). Or, if the device has different technological characteristics from the predicate device(s), include a summary of how the technological characteristics of the device compare to a legally marketed device(s) identified above.

If at the end of this template (in the Administrative Documentation page) you choose to have eSubmitter produce a 510K summary for you, you must include the information from 21 CFR 807.92(a)(6) in this description. If a 510(k) Summary will be produced, the information you enter below will be made publicly available on our website if your device is cleared.

ONLY ENTER NONCONFIDENTIAL INFORMATION IN THE DESCRIPTION BELOW.

Summary of technological characteristics of the new device in comparison to those of the identified predicate device(s) or legally marketed device(s).

Problem: Batteries are not being properly reviewed by reviewers, leading to adverse events caused by battery failure. These failures include, but are not limited to: unexpected battery depletion, battery leakage, battery explosion, early battery death.

Solution: A dynamic guide is being produced that helps a reviewer know what device/battery features to look for to ensure the battery is integrated into the device. This guide will also ensure the choice of battery, charging circuitry (if applicable), battery labeling, etc are optimal and safe for the intended use of the device. This guide will be based on standards and experience from battery reviewers, and will use adverse event reports for focusing the questions.

**Step 2 Substantial Equivalence Comparison**

Please attach your Substantial Equivalence Comparison in tabular format. Microsoft Word and Excel documents, as well as Adobe PDF documents, are acceptable file types to attach. Please ensure the table(s) includes a comparison of the Indications for Use as well as a comparison of the pertinent technology characteristics of your device and your predicate device(s).

Title	Name	Date	Size	Pat
S&E Comparison	S&E Comparison.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLAIDocuments\Projects\leSubr

1 item in the list

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/18/2016 08:01:55 AM Date Packaged: 03/09/2016 08:59:8 AM

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- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documentation
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
    - Software/Firmware
      - Software Description
      - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
    - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation

**Screen: Labeling**

Labeling must conform to the requirements set forth in the Code of Federal Regulations Section 21 CFR 801. We also strongly recommend you consult standard AAMI ANSI ES60601-1:2005(R)2012 Section 7 for applicable labeling that may be necessary for your device if it is electrical (consult ISO 14708-1 instead for implantable components).

**Step 1 General Labeling Requirements**

Are the instructions adequate for Over-the-Counter (OTC) use? **Yes**

Are labeling symbols verbally described? **Yes**

What is the MR safety status for the device(s) in the submission? **MR Unsafe**

**Step 2 Packaging and Shipping Labeling**

Please attach pictures that demonstrate the labeling on any applicable packaging used in the transportation of the device. Pictures in JPEG, PNG and PDF formats are acceptable file types to attach. This includes, but is not limited to: the device packaging, sterile packaging, boxes, and shipping containers.

Title	Name	Date	Size	Pat
Packaging	Packaging.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLAIDocuments\Projects\leSubr

1 item in the list

**Step 3 Complementary Labeling**

Please attach electronic copies of the Manuals, User Instructions, Inserts, Directions for Use and/or Instructions for Use that are intended for use with your device. This includes instructions that may be downloaded or viewed on a website. Adobe PDF and Microsoft Word documents are acceptable filetypes to attach.

1 item in the list

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/18/2016 08:01:55 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
  - Predicate and Reference Devices
  - Substantial Equivalence Comparison
  - Labeling
    - Labeling
    - Reprocessing, Sterilization and Shelf-Life
      - Reprocessing Information
      - Sterilization Information
      - Shelf Life
      - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
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Screen: Labeling

Step 3 Complementary Labeling

Please attach electronic copies of the Manuals, User Instructions, Inserts, Directions for Use and/or Instructions for Use that are intended for use with your device. This includes instructions that may be downloaded or viewed on a website. Adobe PDF and Microsoft Word documents are acceptable filetypes to attach.

Title	Name	Date	Size	Path
User Manual 2	User Manual 2.pdf	02/20/2014 09:01:39 AM	1719 KB	C:\Users\PLA\Documents\Projects\leSubr

1 item in the list

Step 4 Citation of Specific Labeling Requirements

Please specifically cite the attachment and page number where the prescription statement or "Rx only" exists in the labeling?

Please specifically cite the attachment and page number where the Indications for Use exists in the labeling?

Please specifically cite the attachment and page number where the labeling includes statements of all conditions, purposes or uses for which the device is intended (e.g., hazards, warnings, precautions, contraindications)

Please specifically cite the attachment and page number where the name and place of business of the manufacturer, packer, or distributor is located.

Please specifically cite the attachment and page number where the device common or usual name is found in the labeling.

Step 5 Guidance and Special Controls Adherence

If you choose to use an alternative approach in comparison to what is stated in the applicable guidance or special controls, please provide a rationale for this alternative approach below.

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167004 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/18/2016 08:01:55 AM Date Packaged: 03/09/2016 08:59:8 AM

Outline

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
  - Predicate and Reference Devices
  - Substantial Equivalence Comparison
  - Labeling
    - Labeling
    - Reprocessing, Sterilization and Shelf-Life
      - Reprocessing Information
      - Sterilization Information
      - Shelf Life
      - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
    - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation

Screen: Reprocessing Information

If the device(s) requires reprocessing, please consult the [Reprocessing Guidance](#). Reprocessing documentation can be attached at the end of the "Reprocessing, Sterilization and Shelf-Life" section.

High Risk Device Reprocessing Validation

Is any device type in this submission included in Appendix E of the Reprocessing Guidance?

Please attach protocols and test reports for validating the reprocessing instructions, such as for cleaning validation, disinfection validation, and sterilization validation.

Title	Name	Date	Size	Path
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0 items in the list

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Sterilization Information

Item: 1 Sterilized Device/Component/Accessory

Step 1 Sterilized Part

Is the sterilization based on a component/accessory or device(s)?  Component/Accessory

Sterilization based on a component/accessory

- Select the component(s)/accessory(s) this pertains to:
  - Active Electrode

1 of 10 items in the list (1 required)

Sterilization based on device(s)

- Select the device(s) this pertains to:

0 of 10 items in the list

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Sterilization Information

Item: 1 Sterilized Device/Component/Accessory

Step 2 Sterilizer

Is the sterilized part packaged as sterile?  Yes

- For devices sterilized by the end user, please specifically cite the attachment and page number where the sterilization instructions are located for the end user.
- For devices sterilized by the end user, please consult the [Reprocessing Guidance](#) for the documentation you should provide.

Step 3 Sterilization Method and Validation

Sterilization Method  Radiation (rare for End-User Sterilization) (Est A)

- Dose (for radiation)
- Sterilant residuals remaining on the device (for Ethylene Oxide)
- Please clarify whether a Gravity or Dynamic-Air-Removal sterilization method is used. Please also clarify the temperature, exposure time, and drying time that is used?



eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Sterilization Information

Item: 1 Sterilized Device/Component/Accessory

- Please clarify whether a Gravity or Dynamic-Air-Removal sterilization method is used. Please also clarify the temperature, exposure time, and drying time that is used?
- Please provide a description of the sterilization chamber.
- For Novel or Established Category B sterilization methods, be sure to provide the documentation described in the [Sterilization Guidance document](#) in Part V(A)(1)(c). This documentation can be attached at the end of the "Reprocessing, Sterilization and Shelf-Life" section.

Please provide a description of the Validation Method for the sterilization cycle.

ISO 11135-1

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
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    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
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    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Sterilization Information

Item: 1 Sterilized Device/Component/Accessory

Please provide a description of the Validation Method for the sterilization cycle.

ISO 11135-1

Sterility Assurance Level (SAL)

If a device within the submission should be "Non-Pyrogenic," or if you are asserting a device is "Non-Pyrogenic," what is the pyrogenicity test method?

- For devices labeled "Non-Pyrogenic", be sure to provide the documentation described in the [Sterilization Guidance document](#) in Part V(A)(4). This documentation can be attached at the end of the "Reprocessing, Sterilization and Shelf-Life" section.

Please provide a description of the packaging, the materials used, and a description of the package test methods.

Tyvek

Step 4 Guidance and Special Controls Adherence



eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Sterilization Information

Item: 1 Sterilized Device/Component/Accessory

Rabbit Test

If a device within the submission should be "Non-Pyrogenic," or if you are asserting a device is "Non-Pyrogenic," what is the pyrogenicity test method?

- For devices labeled "Non-Pyrogenic", be sure to provide the documentation described in the [Sterilization Guidance document](#) in Part V(A)(4). This documentation can be attached at the end of the "Reprocessing, Sterilization and Shelf-Life" section.

Please provide a description of the packaging, the materials used, and a description of the package test methods.

Typek

Step 4 Guidance and Special Controls Adherence

If you choose to use an alternative approach in comparison to what is stated in the applicable guidance or special controls, please provide a rationale for this alternative approach below.

No alternative approach was used.

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Shelf Life

Please either provide a rationale for why a shelf life is not needed, or provide a shelf life. Once one field is completed, the other will not be required.

Please summarize the methods used to establish that device performance is not adversely affected by aging and therefore device performance will remain substantially equivalent to that of the predicate, or include a rationale for why the storage conditions are not expected to affect device safety or effectiveness.

The device components are sterilized before use, and were durability tested. The device does not use a battery, and no battery ALT is needed.

What is the proposed shelf life?

Please include a summary of the methods used to establish that device sterility/performance will remain substantially equivalent to that of the predicate through the proposed shelf life, or a rationale for why testing to establish shelf life is not applicable.

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
  - Predicate and Reference Devices
  - Substantial Equivalence Comparison
  - Labeling
  - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documentation
  - Biocompatibility
  - Patient Contact Materials
  - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical and Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Reprocessing, Sterilization and Shelf-Life Documentation

Please attach any Sterility, Cleaning, Shelf-Life and Reuse documentation that you believe is pertinent to the review of your device.

0 Items in the list

Title	Name	Date	Size	Path
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OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
  - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documentation
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical and Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Patient Contact Materials

Item: 1 Patient Contact Material

Step 1 Patient Contact Materials Part

Is the patient contact material located on a component/accessory or device(s)?  Component/Accessory

Patient contact material based on a component/accessory

- Select the component(s)/accessory(s) this pertains to:
  - Active Electrode

1 of 10 items in the list (1 required)

Patient contact material based on device(s)

- Select the device(s) this pertains to:

0 of 10 items in the list

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
  - Premarket Notification
    - Substantial Equivalence Comparison
      - Predicate and Reference Devices
      - Substantial Equivalence Comparison
    - Labeling
      - Labeling
    - Reprocessing, Sterilization and Shelf-Life
      - Reprocessing Information
      - Sterilization Information
      - Shelf Life
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    - Software/Firmware
      - Software Description
      - Software Documentation
    - Electromagnetic Compatibility and Electrical, Mechanical
      - Performance Testing
        - Performance Testing Summary
        - Bench Testing
        - Animal Testing
        - Clinical Testing
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    - References
      - References Documents
      - Administrative Documentation

Screen: Patient Contact Materials

Patient Contact Materials

Item: 1 Patient Contact Material

Select the device(s) this pertains to:

0 of 10 items in the list

Step 2 Patient Contact Materials Information

Please state the exact name and any identifiable information for the particular material used.

If color additives are included, please identify them here.

Choose intended contact of the particular material.

Please provide the submission number (e.g., K010001) if you are aware of a previous device using the same material with similar body contact.

If you are aware of a previous device using the same material with similar body contact, please provide any pertinent information you deem necessary in our comparison of your material to the predicate material. If the use of your material is identical to the predicate material, and your material is identical to the final sterilized predicate material in formulation, processing, sterilization, and geometry and no other chemicals have been added (e.g., plasticizers, fillers, color additives, cleaning agents, mold release agents, etc.), then no biocompatibility testing is necessary.

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
  - Premarket Notification
    - Substantial Equivalence Comparison
      - Predicate and Reference Devices
      - Substantial Equivalence Comparison
    - Labeling
      - Labeling
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      - Sterilization Information
      - Shelf Life
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    - Software/Firmware
      - Software Description
      - Software Documentation
    - Electromagnetic Compatibility and Electrical, Mechanical
      - Performance Testing
        - Performance Testing Summary
        - Bench Testing
        - Animal Testing
        - Clinical Testing
    - Verification & Validation
    - References
      - References Documents
      - Administrative Documentation

Screen: Patient Contact Materials

Patient Contact Materials

Item: 1 Patient Contact Material

material in formulation, processing, sterilization, and geometry and no other chemicals have been added (e.g., plasticizers, fillers, color additives, cleaning agents, mold release agents, etc.), then no biocompatibility testing is necessary.

Choose the type of tissue contact of your patient contact material.

Duration of Contact

Is there a potential for repeat exposure?

If there is potential for repeat exposure, please describe the circumstances here.

Consult [this table](#) using the type of tissue contact and duration of contact to determine the types of biocompatibility tests that will be needed. Using the result of this table, consult the appropriate ISO 10993 standards to use in testing. The most common standards to use are ISO 10993-5 (Cytotoxicity Testing) and ISO 10993-10 (Irritation and Sensitization Testing).

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File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
  - Predicate and Reference Devices
  - Substantial Equivalence Comparison
  - Labeling
  - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation**
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Biocompatibility Reports and Documentation

Please either attach biocompatibility test reports, or provide a rationale. Once one field is completed, the other will not be required.

Please attach any documentation (e.g., test reports) pertaining to the biocompatibility of your device. If no documents were attached, please provide a rationale in the space below.

Title	Name	Date	Size	Path
0 items in the list				

This is my rationale for not providing documentation.

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

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- Premarket Notification
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  - Predicate and Reference Devices
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  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description**
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Software Description

Step 1 Software Level of Concern Determination

Does the Software Device qualify as Blood Establishment Computer Software? No

Is the Software Device intended to be used in combination with a drug or biologic? No

Is the Software Device an accessory to a medical device that has a Major Level of Concern? No

Prior to mitigation of hazards, could a failure of the Software Device result in death or serious injury, either to a patient or to a user of the device? Examples of this include the following. No

a) Does the Software Device control a life supporting or life sustaining function?

b) Does the Software Device control the delivery of potentially harmful energy that could result in death or serious injury, such as radiation treatment systems, defibrillators, and ablation generators?

c) Does the Software Device control the delivery of treatment or therapy such that an error or malfunction could result in death or serious injury?

d) Does the Software Device provide diagnostic information that directly drives a decision regarding treatment or therapy, such that if misapplied it could result in serious injury or death?

e) Does the Software Device provide vital signs monitoring and alarms for potentially life threatening situations in which medical intervention is necessary?

Is the Software Device an accessory to a medical device that has a Moderate Level of Concern? No

Prior to mitigation of hazards, could a failure of the Software Device result in Minor Injury, either to a patient or to a user of the device? No

Could a malfunction of, or a latent design flaw in, the Software Device lead to an erroneous diagnosis or a delay in delivery of appropriate medical care that would likely lead to Minor Injury? Yes

Based on the questions answered above, your Level of Concern (LOC) is determined to be: Moderate

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

**Outline**

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    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
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    - Patient Contact Materials
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    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

**Screen: Software Description**

c) Does the Software Device control the delivery of treatment or therapy such that an error or malfunction could result in death or serious injury?

d) Does the Software Device provide diagnostic information that directly drives a decision regarding treatment or therapy, such that if misapplied it could result in serious injury or death?

e) Does the Software Device provide vital signs monitoring and alarms for potentially life threatening situations in which medical intervention is necessary?

Is the Software Device an accessory to a medical device that has a Moderate Level of Concern? No

Prior to mitigation of hazards, could a failure of the Software Device result in Minor Injury, either to a patient or to a user of the device? No

Could a malfunction of, or a latent design flaw in, the Software Device lead to an erroneous diagnosis or a delay in delivery of appropriate medical care that would likely lead to Minor Injury? Yes

Based on the questions answered above, your Level of Concern (LOC) is determined to be: Moderate

**Step 2 Software Description**

Please attach a description of the software / firmware that includes: a textual description of the software / firmware, the version number of the software / firmware, the input parameters (user inputs), and the output parameters (device actions).

1 item in the list

Title	Name	Date	Size	Pat
Software Description	Software Description.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

**Outline**

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    - Reprocessing Information
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    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
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    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
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    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

**Screen: Software Documentation**

The following software documentation is necessary for the level of concern specified. Click on the hint icons for details about what is necessary in the documentation for each.

**Step 3 Software Documentation Checklist**

Device Hazard Analysis 1 item in the list

Title	Name	Date	Size	Pat
Device Hazard Analysis	Device Hazard Analysis.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

Software Requirements Specifications 1 item in the list

Title	Name	Date	Size	Pat
SRS	SRS.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

Architecture Design Chart 1 item in the list

Title	Name	Date	Size	Pat
Arch Design Chart	Arch Design Chart.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Last Modified: 03/09/2016 02:29:6 PM  
 Report Type: CDRH: 510(k) Premarket Notifications Date Packaged: 03/08/2016 05:13:43 PM

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    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Software Documentation

Architecture Design Chart

Title	Name	Date	Size	Pat
Arch Design Chart	Arch Design Chart.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

1 item in the list

Software Design Specifications

Title	Name	Date	Size	Pat
SDS	SDS.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

1 item in the list

Traceability Analysis/Matrix

Title	Name	Date	Size	Pat
Traceability	Traceability.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

1 item in the list

Software Development Environment Description

1 item in the list

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Last Modified: 03/09/2016 02:29:6 PM  
 Report Type: CDRH: 510(k) Premarket Notifications Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Software Documentation

Software Development Environment Description

Title	Name	Date	Size	Pat
SDED	SDED.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

1 item in the list

Verification & Validation Testing

Title	Name	Date	Size	Pat
V&V	V&V.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

1 item in the list

Revision Level History

Title	Name	Date	Size	Pat
Revision History	Revision History.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubr

1 item in the list

Unresolved Anomalies

1 item in the list



eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
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  - Labeling
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  - Reprocessing Information
  - Sterilization Information
  - Shelf Life
  - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
  - Patient Contact Materials
  - Biocompatibility Reports and Documentation
  - Software/Firmware
  - Software Description
  - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
  - References Documents
  - Administrative Documentation

Screen: Electromagnetic Compatibility and Electrical, Mechanical and Thermal Safety

Certain electrical devices that either emit EM radiation or that are by nature of the design or environment of use susceptible to EM interference will require EMC testing. Please see standard IEC 60601-1-2:2007 for the applicable tests to consider.

Step 1 EMC & EMT Summary

Please summarize the Electromagnetic Compatibility Testing, Safeguards, and Electrical, Mechanical and Thermal Testing of your device, or summarize why testing was not needed. Please ensure any standards cited are cited in the Standards node in the first Tab.

This is the EMC summary section text.

Step 2 EMC & EMT Documentation

Please attach the documentation pertaining to the Electromagnetic Compatibility Testing, Safeguards, and Electrical, Mechanical and Thermal Testing of your device.

Title	Name	Date	Size	Path
EMC Testing	EMC Testing.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLA\Documents\Projects\leSubmis

1 item in the list

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
  - Predicate and Reference Devices
  - Substantial Equivalence Comparison
  - Labeling
  - Labeling
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  - Reprocessing Information
  - Sterilization Information
  - Shelf Life
  - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
  - Patient Contact Materials
  - Biocompatibility Reports and Documentation
  - Software/Firmware
  - Software Description
  - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
  - References Documents
  - Administrative Documentation

Screen: Performance Testing Summary

Step 1 General Performance Testing Information

Was Bench Testing required in order to demonstrate safety and/or effectiveness? Yes

Was Animal Testing required in order to demonstrate safety and/or effectiveness? Yes

Was Clinical Testing required in order to demonstrate safety and/or effectiveness? Yes

Step 2 Performance Testing Summary

If the determination of substantial equivalence is also based on an assessment of performance data, please describe the following in the respective text boxes below. If no testing was necessary, state this in the respective field below. If at the end of this template (in the Administrative Documentation page) you choose to have eSubmitter produce a 510K summary for you, you must include the information from 21 CFR 807.92(b) in the summary below. If a 510(k) Summary will be produced, the information you enter below will be made publicly available on our website if your device is cleared.

ONLY ENTER NONCONFIDENTIAL INFORMATION IN THE SUMMARIES BELOW.

Provide a brief discussion of the nonclinical tests submitted, referenced, or relied on in the 510(k) for a determination of substantial equivalence. If any guidance documents or FDA recognized consensus standards were used/referenced for testing, cite these here.

This is the non-clinical summary.

Provide a summary discussion of the clinical tests submitted, referenced, or relied on in the 510(k) for a determination of substantial equivalence. This discussion shall include, where applicable, a description of the subjects upon whom the device was tested, a discussion of the safety or effectiveness data obtained from the testing, with specific reference to adverse effects and complications, and any other information from the clinical testing relevant to a determination of substantial equivalence. Refer to the help text for a list of the details we recommend be included regarding the clinical evidence. (There can not be any patient identifier information in the summary.)

This is the clinical summary.



eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Performance Testing Summary

Provide a summary discussion of the clinical tests submitted, referenced, or relied on in the 510(k) for a determination of substantial equivalence. This discussion shall include, where applicable, a description of the subjects upon whom the device was tested, a discussion of the safety or effectiveness data obtained from the testing, with specific reference to adverse effects and complications, and any other information from the clinical testing relevant to a determination of substantial equivalence. Refer to the help text for a list of the details we recommend be included regarding the clinical evidence. (There can not be any patient identifier information in the summary.)

This is the clinical summary.

State the conclusions drawn from the nonclinical and clinical tests that demonstrate that the device is as safe, as effective, and performs at least as safely and effectively as the legally marketed device identified above.

These are the conclusions of the testing.

Step 3 Guidance or Special Controls Adherence

If you choose to use an alternative approach in comparison to what is stated in the applicable guidance or special controls, please provide a rationale for this alternative approach below.

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
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  - Labeling
    - Labeling
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    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Bench Testing

Choose the predicate device that is the best comparator for the testing attached below.

K010001; Predicate Device Name 1; GEI

Please attach documentation that includes details of the bench testing performed with your device. A full test report includes: objective of the test, description of the test methods and procedures, study endpoint(s), pre-defined pass/fail criteria, results summary, conclusions, and an explanation of how the data generated from the test supports a finding of substantial equivalence. Adobe PDF and Microsoft Word documents are acceptable filetypes to attach.

Title	Name	Date	Size	Path
Bench Testing	Bench Testing.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLAD\Documents\Projects\leSubm

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline: Preliminary Information **Premarket Notification**

- ✓ Premarket Notification Type
  - Substantial Equivalence Comparison
    - ✓ Predicate and Reference Devices
    - ✓ Substantial Equivalence Comparison
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    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - ✓ Reprocessing Information
    - ✓ Sterilization Information
    - ✓ Shelf Life
    - ✓ Reprocessing, Sterilization and Shelf-Life Documentation
  - Biocompatibility
    - ✓ Patient Contact Materials
    - ✓ Biocompatibility Reports and Documentation
  - Software/Firmware
    - ✓ Software Description
    - ✓ Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - ✓ Performance Testing Summary
      - ✓ Bench Testing
      - ✓ **Animal Testing**
      - ✓ Clinical Testing
  - Verification & Validation
  - References
    - ✓ References Documents
  - Administrative Documentation

Screen: Animal Testing

Item: 1

Choose the predicate device that is the best comparator for the testing attached below.

K010001; Predicate Device Name 1; GEI

Please attach documentation that includes details of the animal testing performed with your device. A full test report includes: objective of the test, description of the test methods and procedures, study endpoint(s), pre-defined pass/fail criteria, results summary, conclusions, and an explanation of how the data generated from the test supports a finding of substantial equivalence. Adobe PDF and Microsoft Word documents are acceptable filetypes to attach.

Title	Name	Date	Size	File Path
Animal Study 1	Animal Study 1.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLAD\Documents\Projects\leS

Please include a study protocol which includes all elements as outlined in 21 CFR 58.120.

Title	Name	Date	Size	File Path
Animal Study 2	Animal Study 2.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLAD\Documents\Projects\leS

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline: Preliminary Information **Premarket Notification**

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  - Substantial Equivalence Comparison
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    - ✓ Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - ✓ Reprocessing Information
    - ✓ Sterilization Information
    - ✓ Shelf Life
    - ✓ Reprocessing, Sterilization and Shelf-Life Documentation
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    - ✓ Biocompatibility Reports and Documentation
  - Software/Firmware
    - ✓ Software Description
    - ✓ Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - ✓ Performance Testing Summary
      - ✓ Bench Testing
      - ✓ **Animal Testing**
      - ✓ Clinical Testing
  - Verification & Validation
  - References
    - ✓ References Documents
  - Administrative Documentation

Screen: Animal Testing

Item: 1

Title	Name	Date	Size	File Path
Animal Study 2	Animal Study 2.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLAD\Documents\Projects\leS

Please include a final study report which includes all elements as outlined in 21 CFR 58.185.

Title	Name	Date	Size	File Path
Animal Study 3	Animal Study 3.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLAD\Documents\Projects\leS

Please provide a statement that the study was conducted in compliance with applicable requirements in the GLP regulation (21 CFR Part 58), or, if the study was not conducted in compliance with the GLP regulation, please explain why the noncompliance would not impact the validity of the study data provided to support a substantial equivalence determination.

The study is in compliance with the GLP regulations.

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
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    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Clinical Testing

Item: 1

Choose the predicate device that is the best comparator for the testing attached below.

K010001; Predicate Device Name 1; GEI

Please attach documentation that includes details of the clinical testing performed with your device. A full test report includes: objective of the test, description of the test methods and procedures, study endpoint(s), pre-defined pass/fail criteria, results summary, conclusions, and an explanation of how the data generated from the test supports a finding of substantial equivalence. Adobe PDF and Microsoft Word documents are acceptable filetypes to attach.

Title	Name	Date	Size	Pat
Clinical Data	Clinical Data.pdf	12/13/2013 10:27:44 AM	153 KB	C:\Users\PLAD\Documents\Projects\leSubr

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eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
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    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
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    - Sterilization Information
    - Shelf Life
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    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: Verification & Validation

A Special 510(k) requires Verification and Validation of the changes made to the previously cleared device. The requirements of this Design Verification and Validation Summary (DVVS) are four in number, a summary of which is requested below. For more information about the content of a Special 510(k), please see [this webpage](#).

Step 1 Design Modifications

Please summarize the design modifications you made to your device since it was previously cleared.

Please attach any files related to the Design Modifications.

Title	Name	Date	Size	Pat
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0 items in the list

Step 2 Risk Assessment

Please summarize the risks associated with each modification made to your device.

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation

Screen: Verification & Validation

Step 2 Risk Assessment

Please summarize the risks associated with each modification made to your device.

Please attach any files related to the Risk Assessment.

0 items in the list

Title	Name	Date	Size	Pat
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Step 3 Testing

Please summarize the test method/protocol and acceptance criteria used to verify mitigation of the risks.

Please attach any files related to the testing.

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File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
- Premarket Notification
  - Premarket Notification Type
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documenta
  - Biocompatibility
    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
    - Performance Testing
      - Performance Testing Summary
      - Bench Testing
      - Animal Testing
      - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation

Screen: Verification & Validation

Step 3 Testing

Please summarize the test method/protocol and acceptance criteria used to verify mitigation of the risks.

Please attach any files related to the testing.

0 items in the list

Title	Name	Date	Size	Pat
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Step 4 Confirmation Statement

Please state whether the acceptance criteria were met.

OMB # 0910-0120, Expires January, 31 2017

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Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
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    - Predicate and Reference Devices
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  - Labeling
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    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documents
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    - Patient Contact Materials
    - Biocompatibility Reports and Documentation
  - Software/Firmware
    - Software Description
    - Software Documentation
  - Electromagnetic Compatibility and Electrical, Mechanical
  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
    - Administrative Documentation

Screen: References Documents

Item: 1

Please add Legible reprints or a summary of each article.

File Attachment: Journal Article (C:\Users\PLA\Documents\Projects\Submission\Pilot 1\Test Attachments\Journal Article.pdf)

Please include a discussion of how each article is applicable to support the substantial equivalence of the subject device to the predicate.

This is an article from JAMA.

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File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications

Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline

- Preliminary Information
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    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
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  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
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  - References
    - References Documents
    - Administrative Documentation

Screen: Administrative Documentation

The following items with a blue dot are required for all 510(k) submissions regardless of submission type or the type of data provided. Links are provided to relevant forms and guidances in the lightbulb hints.

**Truthful and Accurate Statement**

The Truthful and Accurate Statement is required for all 510(k) types (21 CFR 807.87(k)). It is a legally binding statement that provides additional assurance that the data submitted in the 510(k) is truthful and accurate and that no material fact has been omitted. This statement must be signed by a responsible person of the applicant company; it cannot be signed by a consultant to the applicant. **If you are a responsible party of the 510(k) owner, this statement will be automatically produced and signed with the signature you use to sign this application during the packaging process. Ensure the signature you use to sign this application is for the owner of the 510(k), or, if you are not the a responsible party of the 510(k) owner, attach a Truthful and Accurate statement below. The submitter of this application, which is verified via the WebTrader account used to submit via the Electronic Submission Gateway, is legally responsible for the authenticity of the signature.**

Weblink: [Truthful and Accurate Statement](#)

Are you a responsible party of the owner for this 510(k) Premarket Notification, and will you be packaging this application for submission?  Yes  No

Please use the link above to access the Truthful and Accurate statement. Please have a responsible party of the 510(k) owner sign this document. Then print, sign, scan and upload this document here.

File Attachment: Form 3454 (C:\Users\PLA\Documents\Projects\Submission\Pilot 1\Test Attachments\Form 3454.pdf)

Financial Certification and Disclosure Statement (Form FDA-3454)

File Attachment: Form 3674 (C:\Users\PLA\Documents\Projects\Submission\Pilot 1\Test Attachments\Form 3674.pdf)

Clinical Trials Certification Form (Form FDA-3674)

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

**Outline**

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
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    - Sterilization Information
    - Shelf Life
    - Reprocessing, Sterilization and Shelf-Life Documents
  - Biocompatibility
    - Patient Contact Materials
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    - Software Documentation
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  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation

**Screen: Administrative Documentation**

Are you a responsible party of the owner for this 510(k) Premarket Notification, and will you be packaging this application for submission?  Yes

Please use the link above to access the Truthful and Accurate statement. Please have a responsible party of the 510(k) owner sign this document. Then print, sign, scan and upload this document here.

File Attachment

Financial Certification and Disclosure Statement (Form FDA-3454)

File Attachment     Form 3454 (C:\Users\PLAIDocuments\ProjectstSubmission\Pilot 1\Test Attachments\Form 3454.pdf)

Clinical Trials Certification Form (Form FDA-3674)

File Attachment     Form 3674 (C:\Users\PLAIDocuments\ProjectstSubmission\Pilot 1\Test Attachments\Form 3674.pdf)

Executive Summary

File Attachment

**!** Would you like to attach a 510(k) Statement? If you do not attach a 510(k) Statement, a 510(k) Summary will be produced for you. If you choose to have a 510(k) Summary produced instead of attaching a 510(k) Statement, be aware that the data provided in the 510(k) Summary will be publicly available if your 510(k) is cleared. As a result, be sure no confidential information is included in the 510(k) Summary. Once you complete this template and package it, the 510(k) Summary can be found within the resulting packaged zip file found under the Package folder location (specified within the user preferences).

510(k) Statement

File Attachment

Are all of the attachments included in this submission in English, or have an English translation accompanying them?  Yes

OMB # 0910-0120, Expires January, 31 2017

eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

**Outline**

- Preliminary Information
- Premarket Notification
  - Substantial Equivalence Comparison
    - Predicate and Reference Devices
    - Substantial Equivalence Comparison
  - Labeling
    - Labeling
  - Reprocessing, Sterilization and Shelf-Life
    - Reprocessing Information
    - Sterilization Information
    - Shelf Life
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  - Biocompatibility
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    - Biocompatibility Reports and Documentation
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  - Electromagnetic Compatibility and Electrical, Mechanical
  - Performance Testing
    - Performance Testing Summary
    - Bench Testing
    - Animal Testing
    - Clinical Testing
  - Verification & Validation
  - References
    - References Documents
  - Administrative Documentation
  - Other Supportive Information
  - Submittal & Feedback

**Screen: Other Supportive Information**

Please attach any additional files you believe are pertinent to the review of your device.

0 items in the list

Title	Name	Date	Size	Path
0 items in the list				

OMB # 0910-0120, Expires January, 31 2017



eSubmitter - TEST

File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/09/2016 02:29:6 PM Date Packaged: 03/08/2016 05:13:43 PM

Outline: Preliminary Information **Premarket Notification**

- Substantial Equivalence Comparison
- Labeling
  - Labeling
- Reprocessing, Sterilization and Shelf-Life
  - Reprocessing Information
  - Sterilization Information
  - Shelf Life
  - Reprocessing, Sterilization and Shelf-Life Documents
- Biocompatibility
  - Patient Contact Materials
  - Biocompatibility Reports and Documentation
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- Verification & Validation
- References
  - References Documents
  - Administrative Documentation
  - Other Supportive Information
  - Submittal & Feedback

Screen: Submittal & Feedback

### Registration and Listing

Owners or operators of places of business (also called establishments or facilities) that are involved in the production and distribution of medical devices intended for use in the United States (U.S.) are required to register annually with the FDA. This process is known as establishment registration.

Congress has authorized FDA to collect an annual establishment registration fee for device establishment registrations. A detailed list of all those establishment types that have to pay the registration fee can be found at ["Who Must Register, List and Pay the Fee"](#). There are no reductions in annual establishment registration fees for small businesses or any other group.

The schedule of registration fees for fiscal years as follows:

Year	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017
Fee	\$2,575	\$3,313	\$3,750	\$3,872	\$3,872

Most establishments that are required to register with the FDA are also required to list the devices that are made there and the activities that are performed on those devices. If a device requires premarket approval or notification before being marketed in the U.S., then the owner/operator should also submit the FDA premarket submission number (510(k), PMA, PDP, HDE).

The amendments to the Medical Device User Fee Modernization Act require that after September 30th, 2007, all [registration and listing information be submitted electronically](#), unless a [waiver](#) has been granted.

Registration and listing provides FDA with the location of medical device establishments and the devices manufactured at those establishments. Knowing where devices are made increases the nation's ability to prepare for and respond to public health emergencies.

For details about registering and listing your device, please see the ["Device Registration and Listing" webpage](#). If you encounter an issue or wish to contact us regarding the Electronic Registration and Listing System (FURLS), please send an email to [regist@cdrh.fda.gov](mailto:regist@cdrh.fda.gov).

**Submission Fees**

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File Edit View Table Output Tools Help

Submission Name: K167001 Report Type: CDRH: 510(k) Premarket Notifications Last Modified: 03/18/2016 08:13:56 AM Date Packaged: 03/08/2016 05:13:43 PM

Outline: Preliminary Information **Premarket Notification**

- Substantial Equivalence Comparison
- Labeling
  - Labeling
- Reprocessing, Sterilization and Shelf-Life
  - Reprocessing Information
  - Sterilization Information
  - Shelf Life
  - Reprocessing, Sterilization and Shelf-Life Documents
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  - Patient Contact Materials
  - Biocompatibility Reports and Documentation
- Software/Firmware
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Screen: Submittal & Feedback

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### Submission Fees

The standard and small business fees for a Premarket Notification (510(k)) are [updated annually](#) on or about August 1st. To pay this user fee, please complete the [MDUFA User Fee Cover Sheet](#). Directions on completing can be found at ["MDUFMA User Fees Cover Sheet"](#).

Please attach your MDUFA User Fee Cover Sheet here.

File Attachment: MDUFA User Fee (C:\Users\PLAD\Documents\Projects\Submission\Pilot 1\Test Attachments\MDUFA User Fee.pdf)

Please enter in the User Fee Payment Identification Number: MD1234567-991011

Please feel free to provide feedback in regards to your experience completing this electronic application to [eSubPilot@fda.hhs.gov](mailto:eSubPilot@fda.hhs.gov). We are particular interested in optimizing the process by which data and documents are obtained, and knowing whether you had any issues in using electronic signatures.

OMB # 0910-0120, Expires January, 31 2017