

February 10, 2020

Elos Medtech Pinol A/S % Floyd Larson President PaxMed International, LLC 12264 El Camino Real, Suite 400 San Diego, California 92130

Re: K191919

Trade/Device Name: Elos Accurate® Hybrid Base

Regulation Number: 21 CFR 872.3630

Regulation Name: Endosseous Dental Implant Abutment

Regulatory Class: Class II Product Code: NHA Dated: January 6, 2020 Received: January 7, 2020

Dear Floyd Larson:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to https://www.fda.gov/medical-device-problems.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance) and CDRH Learn (https://www.fda.gov/training-and-continuing-education/cdrh-learn). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

for Srinivas Nandkumar, Ph.D.

Director
DHT1B: Division

DHT1B: Division of Dental Devices OHT1: Office of Ophthalmic, Anesthesia,

Respiratory, ENT and Dental Devices Office of Product Evaluation and Quality Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120 Expiration Date: January 31, 2017 See PRA Statement below.

510(k) Number (if known)

K191919

Device Name

Elos Accurate® Hybrid Base

Indications for Use (Describe)

The Elos Accurate® Hybrid Base™ is intended for attaching to dental implants in order to provide basis for single or multiple tooth prosthetic restorations. The Hybrid Base™ is used as an interface between a dental implant and a zirconia superstructure and will be attached to the implant using the included prosthetic screw and attached to the zirconia superstructure by cementing.

The Elos Accurate® Hybrid Base™ is compatible with the implant systems listed in Table 1.

Table 1.

Implant Platform compatibility	Platform diameter [mm]	Implant Body diameter [mm]
Nobel Replace NP	3.5	3.5
Nobel Replace RP	4.3	4.3
Nobel Replace WP	5	5
Nobel Replace 6.0	6	6
Nobel CC 3.0	3	3
Nobel CC NP	3.5	3.5 & 3.75
Nobel CC RP	3.9	4.3 & 5
Nobel CC WP	5.1	5.5
Straumann Bone Level NC	3.3	3.3
Straumann Bone Level RC	4.1 & 4.8	4.1 & 4.8
Astra Tech 3.0	3	3
Astra Tech 3.5/4.0	3.5 & 4	3.5 & 4
Astra Tech 4.5/5.0	4.5 & 5	4.5 & 5
Astra Tech EV 3.0	3	3
Astra Tech EV 3.6	3.6	3.6
Astra Tech EV 4.2	4.2	3.6 & 4.2
Astra Tech EV 4.8	4.8	4.2 & 4.8
Astra Tech EV 5.4	5.4	5.4

All digitally designed zirconia superstructures for use with the Elos Accurate[®] Hybrid BaseTM are only intended to be sent and manufactured at an FDA registered Elos Medtech approved milling facility.

Type of Use (Select one or both, as applicable)

Prescription Use (Part 21 CFR 801 Subpart D)

Over-The-Counter Use (21 CFR 801 Subpart C)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff PRAStaff @fda.hhs.gov

"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."

510(k) Summary

K191919

Elos Medtech Pinol A/S Elos

Accurate® Hybrid BaseTM

February 10, 2020

ADMINISTRATIVE INFORMATION

Manufacturer Name Elos Medtech Pinol A/S

Engvej 33

DK-3330 Gørløse, Denmark Telephone +45 48 21 64 69

Official Contact Tina Friis Poulsen, Head of Compliance

Representative/Consultant Floyd G. Larson, MS, MBA

Kevin A. Thomas, PhD PaxMed International, LLC 12264 El Camino Real, Suite 400

San Diego, CA 92130

Telephone: +1 858-792-1235 Fax: +1 858-792-1236 Email: flarson@paxmed.com

kthomas@paxmed.com

DEVICE NAME AND CLASSIFICATION

Trade/Proprietary Name Elos Accurate® Hybrid BaseTM
Common Name Dental implant abutment

Regulation Number 21 CFR 872.3630

Regulation Name Endosseous dental implant abutment

Regulatory Class II Product Code NHA

Classification Panel Dental Products Panel

Reviewing Division DHT1B: Division of Dental Devices

PREDICATE DEVICE INFORMATION

Primary Predicate

K173908, DESS Dental Smart Solutions, Terrats Medical SL

Reference Devices

K151621, BioHorizons CAD/CAM Abutments, BioHorizons Implant Systems, Inc.

K171799, Elos Accurate® Customized Abutment, Elos Medtech Pinol A/S

K183518, Preat Abutments, Preat Corporation

K080396, OsseoSpeed Narrow, Dentsply Sirona

K053384, Fixture MicroThread OsseoSpeed, Dentsply Sirona

K120414, OsseoSpeed Plus, Dentsply Sirona

K102436, Nobel Active 3.0, Nobel Biocare AB

K071370, NobelActive Internal Connection Implant, Nobel Biocare AB K133731, NobelActive Wide Platform (WP), Nobel Biocare AB K023113, Replace TiUnite Endoessous Implant, Nobel Biocare AB K062129, P.0004 Implants (Straumann Dental Implant System), Institut Straumann K130436, Multilink Hybrid Abutment Cement, Ivoclar Vivadent AG

INDICATIONS FOR USE

The Elos Accurate[®] Hybrid Base[™] is intended for attaching to dental implants in order to provide basis for single or multiple tooth prosthetic restorations. The Hybrid Base[™] is used as an interface between a dental implant and a zirconia superstructure and will be attached to the implant using the included prosthetic screw and attached to the zirconia superstructure by cementing.

The Elos Accurate[®] Hybrid Base[™] is compatible with the implant systems listed in Table 1.

Table 1.

Implant Platform compatibility	Platform diameter [mm]	Implant Body diameter [mm]			
Nobel Replace NP	3.5	3.5			
Nobel Replace RP	4.3	4.3			
Nobel Replace WP	5	5			
Nobel Replace 6.0	6	6			
Nobel CC 3.0	3	3			
Nobel CC NP	3.5	3.5 & 3.75 4.3 & 5			
Nobel CC RP	3.9				
Nobel CC WP	5.1	5.5			
Straumann Bone Level NC	3.3	3.3			
Straumann Bone Level RC	4.1 & 4.8	4.1 & 4.8			
Astra Tech 3.0	3	3			
Astra Tech 3.5/4.0	3.5 & 4	3.5 & 4			
Astra Tech 4.5/5.0	4.5 & 5	4.5 & 5			
Astra Tech EV 3.0	3	3			
Astra Tech EV 3.6	3.6	3.6			
Astra Tech EV 4.2	4.2	3.6 & 4.2			
Astra Tech EV 4.8	4.8	4.2 & 4.8			
Astra Tech EV 5.4	5.4	5.4			

All digitally designed zirconia superstructures for use with the Elos Accurate[®] Hybrid Base[™] are only intended to be sent and manufactured at an FDA registered Elos Medtech approved milling facility.

DEVICE DESCRIPTION

The Elos Accurate Hybrid Base is a titanium base designed to interface with a dental implant and to support a patient-specific ceramic superstructure or a multi-unit direct restoration cemented to the base. The base and the superstructure form a patient-specific abutment that will support a definitive restoration, either a single crown or a multi-unit restoration. The Elos Accurate Hybrid Base Engaging is intended for single-unit restorations and Elos Accurate Hybrid Base Nonengaging is intended for multi-unit restorations. Alternatively, a definitive multi-unit restoration may be cemented directly to the Elos Accurate Hybrid Base.

Manufacture of the final finished device will be at an Elos Medtech-approved milling facility that is registered with FDA as a medical device manufacturer and is qualified as a contract manufacturer to Elos Medtech.

This submission includes a two-piece abutment (titanium base and zirconia superstructure) and abutment screws compatible with OEM implants from Dentsply Implants (Astra Tech TX, Astra Tech EV), Nobel Biocare (Nobel Active/Conical Connection and Nobel Replace) and Institut Straumann (Straumann Bone Level NC and RC).

Abutments compatible with Astra Tech implants are available in engaging (anti-rotational) designs, and all others are available in both engaging and non-engaging designs.

PERFORMANCE DATA

Non-clinical data submitted to demonstrate substantial equivalence include: biocompatibility evaluation and confirmatory cytotoxicity testing according to ISO 10993-5 *Biological evaluation* of medical devices – Part 5: Tests for in vitro cytotoxicity, and dynamic compression-bending testing according to ISO 14801 *Dentistry – Implants – Dynamic fatigue test for endosseous* dental implants. No clinical data were included in this submission.

Substantial equivalence with regard to compatibility with OEM components is supported by engineering and dimensional analysis of OEM implant bodies, OEM abutments and OEM abutment fixation screws to confirm compatibility.

Substantial equivalence with regard to mechanical performance is supported by dynamic testing according to ISO 14801 *Dentistry – Implants – Dynamic fatigue test for endosseous dental implants*.

The coatings used on selected screws are identical to coatings on previously cleared devices. The Medicarb coating is identical to the Medicarb (DLC) coating on reference device K171799 and the Nobel DLC coating is identical to the DLC coating on compatible device K071370. Sterilization validation of the reprocessing instructions were conducted in accordance to ISO 17665-1 and ISO 17665-2.

Minor differences in the designs, dimensions, sizes, or compatible OEM implant lines among the subject device, the primary predicate device, and the reference devices do not affect substantial equivalence. These minor differences do not impact a determination of substantial equivalence because these differences are related to the compatible OEM implant designs or are mitigated by the mechanical performance testing.

EQUIVALENCE TO MARKETED DEVICE

Overall, the subject device has the following similarities to the predicate devices:

- has the same intended use,
- uses the same operating principle,
- incorporates the same basic design,
- incorporates the same or very similar materials, and
- has similar packaging and is sterilized using the same materials and processes.

The basis for the belief of Elos Medtech Pinol A/S that the subject device is substantially equivalent to the predicate devices is summarized in the following *Table of Substantial Equivalence*.

						Table of Subst	antial Equivalence – Indications	s for Use Statement					
	Subject	Device		P	rimary Predicat	e	Reference Device	Refe	erence Device		Rei	ference Device	
Elos Accurate® Hybrid Base™ Elos Medtech Pinol A/S		K173908 DESS Dental Smart Solutions		K151621 BioHorizons CAD/CAM Abutments	K171799 Elos Accurate® Customized Abutment,		K183518 Preat Abutments						
	Elos Medtech Pinol A/S		Terrats Medical SL			BioHorizons Implant Systems, Inc.	Elos Medtech Pinol A/S			Preat Corporation			
implerestoring usin super	Elos Accurate® Hybrid Base™ is in ants in order to provide basis for orations. The Hybrid Base™ is used ant and a zirconia superstructure ig the included prosthetic screw an ristructure by cementing. Elos Accurate® Hybrid Base™ is come listed in Table 1.	single or mu d as an inter and will be a d attached t	altiple tooth prosthetic face between a dental attached to the implant to the zirconia	<u> </u>	h endosseous dent ir arch to provide s sustom abutments f I Blank are to be so	al implants in the upport for prosthetic for use with Aurum™ ent to a Terrats afacture.	BioHorizons CAD/CAM Abutments are dental abutments placed onto a dental implant to provide support for dental prosthetic restorations. The abutments include: 1) Titanium abutment blanks with a pre-machined implant connection where the upper portion may be custom-milled in accordance with a patient-specific design using CAD/CAM techniques;	The Elos Accurate® Cus for attaching to dental in for single or multiple to Elos Accurate® Customi a dental implant using the The Elos Accurate® Cus compatible with the foll	mplants in order to poth prosthetic restorated Abutment will the included Elos Prottomized Abutments owing implant system.	rovide basis ations. The be attached to sthetic screw. are ms:	Preat Abutments are intended to limplants in the maxillary or man multi-unit prosthetic restorations. major parts. Specifically, the titat make up a two-piece abutment. All digitally designed custom ab for use with Titanium Base or Ti milling center for manufacture. Compa	dibular arch to provide supp. The Titanium Base abutmenium base and mesostructure utments, superstructures, ar	ort for single-unit or ents consists of two ed components nd/or hybrid crowns
	Table 1. Implant Platform	Platform	Implant Body	Implant System Compatibility 3i Certain®	3.25, 4.0, 5.0	Implant Platform 3.4, 4.1, 5.0	and 2) Titanium bases with a pre- machined implant connection upon which a CAD/CAM designed	Ref. No. AB-BRA411213-US	Platform compatibility Nobel Biocare® / Brånemark® RP	Implant diameter 3.75 mm & 4 mm	Compatible Implant System	Implant Body Diameter (mm)	Implant Platform Diameter
	compatibility	diameter [mm]	diameter [mm]	3i OSSEOTITE®	3.25, 3.75, 4.0, 5.0	3.4, 4.1, 5.0	superstructure may be fitted to complete a two-piece dental	AB-BRA351213-US	Nobel Biocare®/	3.3 mm	3i OSSEOTITE® Certain®	3.25	(mm)
	Nobel Replace NP	3.5	3.5	OsseoSpeed TM	3.5, 4.0, 5.0	3.5/4.0, 4.5/5.0	abutment. The abutments include an		Brånemark® RP		31 OSSEOTTE Certain	4.0	3.4 4.1
	Nobel Replace RP	4.3	4.3	FRIADENT XiVE	3.4, 3.8, 4.5	3.4, 3.8, 4.5	abutment screw for fixation to the	AB-BRA511213-US	Nobel Biocare® / Brånemark® RP	5 mm		5.0	5.0
	Nobel Replace WP	5	5	NobelActive®	3.5, 4.3, 5.0	NP, RP	underlying implant. The abutments	All digitally designed E	los Accurate® Custon	mized			
	Nobel Replace 6.0	6	6	NobelReplace Conical	3.5, 4.3, 5.0	NP, RP	may be used for single-unit (single-	Abutments are intended			l 	6.0	6.0
	Nobel CC 3.0	3	3	Nobel Replace			tooth) or multiple-unit (bridges and	Medtech approved milli	ing facility.		Astra Tech OsseoSpeed TM	3.0	3.0
	Nobel CC NP	3.5	3.5 & 3.75	Trilobe	3.5, 4.3, 5.0	NP, RP, WP	bars) restorations and are compatible for use with BioHorizons Internal and					3.5, 4.0	3.5/4.0
	Nobel CC RP	3.9	4.3 & 5		3.5, 3.75/4.0,		Tapered Internal implant systems and					4.5, 5.0	4.5/5.0
	Nobel CC WP	5.1	5.5	Brånemark	5.0	NP, RP, WP	Zimmer® Dental Screw-Vent® and				BioHorizons Tapered Internal	3.0	3.0
	Straumann Bone Level NC	3.3	3.3	Straumann® Bone	3.3, 4.1, 4.8	NC, RC	Tapered Screw-Vent® implants with					3.5	3.5
	Straumann Bone Level RC	4.1 & 4.8	4.1 & 4.8	Level	3.3, 4.1, 4.6	NC, KC	3.5mm, 4.5mm and 5.7mm internal					4.0	4.5
	Astra Tech 3.0	3	3	Straumann® Tissue Level	3.3, 4.1, 4.8	RN, WN	hex-connection mating platform				HIOSSEN ET III	3.5	Mini
	Astra Tech 3.5/4.0	3.5 & 4	3.5 & 4	Tapered Screw-	3.7, 4.1, 4.7,		diameters.					4.0, 4.5, 5.0, 6.0, 7.0	Regular
	Astra Tech 4.5/5.0	4.5 & 5	4.5 & 5	Vent®	6.0	3.5, 4.5, 5.7	All digitally designed abutments				Implant Direct Legacy	3.2	3.0
	Astra Tech EV 3.0	3	3	vent			and/or copings for use with					3.7, 4.2	3.5
	Astra Tech EV 3.6	3.6	3.6				BioHorizons CAD/CAM Abutments					4.7, 5.2	4.5
	Astra Tech EV 4.2	4.2	3.6 & 4.2				are intended to be sent to a					5.7, 7.0	5.7
	Astra Tech EV 4.8	4.8	4.2 & 4.8				BioHorizons-validated milling center				MegaGen AnyRidge	3.5, 4.0, 4.5, 5.0, 5.5	3.5
	Astra Tech EV 5.4	5.4	5.4				for manufacture. BioHorizons abutments designed using CAD/CAM				Neoss	3.5, 4.0, 4.5, 5.0, 5.5	4.1
							techniques must fulfill the				NobelActive®	3.5	NP
	digitally designed zirconia superst						BioHorizons allowable range of					4.3, 5.0	RP
	urate [®] Hybrid Base [™] are only inter FDA registered Elos Medtech ap						design parameters.				Nobel Replace™	3.5	NP
at ai	TDA registered Elos Mediceli ap	proved min	ing racinty.								1	4.0, 4.3, 5.0	RP
												5.0	WP
												6.0	6.0
											Straumann® Bone Level	3.3	NC
											Saaamami Bone Level	4.1, 4.8	RC
											Straumann® Tissue Level	3.3, 4.1, 4.8	RN
												4.8, 6.5	WN
											Zimmer Screw-Vent®/Tapered Screw-Vent®	3.3, 3.7, 4.1	3.5

4.5 5.7

4.7 6.0

Table of Substantial Equivalence – Technological Characteristics

Comparison	Subject Device	Primary Predicate	Reference Device	Reference Device	Reference Device	
	Elos Accurate® Hybrid Base TM	K173908 DESS Dental Smart Solutions	K151621 BioHorizons CAD/CAM Abutments	K171799 Elos Accurate® Customized Abutment	K183518 Preat Abutments	
	Elos Medtech Pinol A/S	Terrats Medical SL	BioHorizons Implant Systems, Inc.	Elos Medtech Pinol A/S	Preat Corporation	
Intended Use	Support of a prosthesis to restore chewing function	Support of a prosthesis to restore chewing function	Support of a prosthesis to restore chewing function	Support of a prosthesis to restore chewing function	Support of a prosthesis to restore chewing function	
Reason for Predicate/Reference	Not applicable	Abutment design	Abutment design	Medicarb (DLC) coating on screws	Performance testing data	
	Titanium Base Engaging	Titanium Base Engaging	Titanium Base Engaging		Titanium Base Engaging	
Abutment Designs	Titanium Base Non-Engaging	Titanium Base Non-Engaging	Titanium Base Non-Engaging		Titanium Base Non-Engaging	
			Others	Titanium Blank Engaging	Others	
Prosthesis Attachment	Cement-retained	Cement-retained	Cement-retained	Cement-retained	Cement-retained Screw retained	
Restoration	Single-unit Multi-unit	Single-unit Multi-unit	Single-unit Multi-unit	Single-unit Multi-unit	Single-unit Multi-unit	
Abutment/Implant Platform Diameter (mm)	3.0 – 6.5	3.3 – 6.5	3.0 – 5.7	3.5 – 5.1	3.0 – 5.7	
Abutment Angle	20° maximum	Straight (0°)	20° maximum	20° maximum	30° maximum	
Abutment/ Implant Interface	Internal connection	Internal connection; External connection	Internal connection	Internal connection	Internal connection	
Materials						
Abutment	Ti-6Al-4V alloy Zirconia according to ISO 13356	Ti-6Al-4V alloy Zirconia according to ISO 13356	Ti-6Al-4V alloy Zirconia according to ISO 13356	Ti-6Al-4V alloy	Ti-6Al-4V alloy Zirconia according to ISO 13356	
Screw	Ti-6Al-4V alloy	Ti-6Al-4V alloy	Ti-6Al-4V alloy	Ti-6Al-4V alloy	Ti-6Al-4V alloy	
Surface	Anodized, non-anodized, Medicarb coating on screw	Anodized	Anodized	Non-anodized, Medicarb coating on screw	Non-anodized	