



November 5, 2021

Medacta International, SA
% Chris Lussier
Senior Director, Quality and Regulatory
Medacta USA
3973 Delp Street
Memphis, Tennessee 38118

Re: K210859
Trade/Device Name: NextAR™ Spine Platform
Regulation Number: 21 CFR 882.4560
Regulation Name: Stereotaxic Instrument
Regulatory Class: Class II
Product Code: OLO, JWH, PBF
Dated: September 29, 2021
Received: September 30, 2021

Dear Chris Lussier:

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 Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); 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-devices/medical-device-safety/medical-device-reporting-mdr-how-report-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>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

For

Shumaya Ali, M.P.H.

Assistant Director

DHT6C: Division of Restorative, Repair
and Trauma Devices

OHT6: Office of Orthopedic Devices

Office of Product Evaluation and Quality

Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)

K210859

Device Name

NextAR™ Spine Platform

Indications for Use (Describe)

The NextAR Spine platform is intended as an aid for precisely locating anatomical structures in either open/mini-open or percutaneous spine procedures. It is indicated for any medical condition in which the use of stereotaxic surgery may be appropriate, when reference to a rigid anatomical structure, such as vertebrae or pelvis, can be identified relative to images of the anatomy. This can include the following spinal implant procedures, such as:

- Pedicle Screw Placement (Thoracic and Lumbosacral spine)
- Iliosacral Screw Placement

The NextAR Spine platform is intended to be used in combination with NextAR™ Stereotaxic instruments and / or Medacta preoperative planning. In the case of pre-operative planning, surgical planning software is used pre-operatively to plan the surgical placement of pedicle screws based upon radiological images of the patient. As an optional display, the NextAR Smart Glasses can be used auxiliary to the NextAR Spine Platform to view stereotaxic information as presented by the NextAR Spine Platform. The NextAR Smart Glasses should not be relied upon solely and should always be used in conjunction with the primary computer display.

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.

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510(k) Summary

I. Submitter

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Contact Person: Stefano Baj, Regulatory Affairs Director, Medacta International SA
Applicant Correspondent: Chris Lussier, Sr. Director of Quality and Regulatory, Medacta USA
Date Prepared: March 22, 2021
Dave Revised: November 4, 2021

II. Device

Device Proprietary Name:	NextAR™ Spine Platform
Common or Usual Name:	Navigation System Total Joint Replacement
Classification Name:	Stereotaxic Instrument
Primary Product Code:	OLO JWH BPF
Regulation Number:	21 CFR 882.4560
Device Classification	II

III. Predicate Device

Substantial equivalence is claimed to the following devices:

Primary predicate device:

- Stealth Station System, K170011, Medtronic

Additional predicate devices:

- NextAR™ TKA Platform K193559, Medacta International SA
- NextAR™ TKA Platform K202152, Medacta International SA

Reference predicate devices:

- M.U.S.T. Pedicle Screw System, K121115, Medacta International SA
- M.U.S.T. Pedicle Screw System, K132878, Medacta International SA
- M.U.S.T. Pedicle Screw System, K141988, Medacta International SA
- M.U.S.T. Pedicle Screw System, K162061, Medacta International SA
- M.U.S.T. Pedicle Screw System, K171170, Medacta International SA
- M.U.S.T. Pedicle Screw System, K171369, Medacta International SA

- M.U.S.T. Pedicle Screw System, K171595, Medacta International SA
- M.U.S.T. Pedicle Screw System, K193365, Medacta International SA

IV. Device Description

The NextAR™ Spine Platform is a CT based computer-assisted surgical navigation platform used in either open/mini open or percutaneous spine surgery procedure and includes the following components:

- Navigation software which displays information to the surgeon;
- Augmented Reality glasses;
- Optical tracking system;
- PC based hardware platform;
- Fiducial Block;
- Adaptor for sensor;
- Spine attachment instruments
- Reusable surgical instruments for spine surgery procedures.

The system operates on the common principle of stereotaxic technology in which markers are mounted on the bones and an infrared camera is used to monitor the spatial location of the instruments. Tracking sensors attached to the bones enable the surgeon to view the position and orientation of the instrumentation relative to the intra-operative data in real-time while performing the surgical procedure. The tracking sensors, the fiducial block, and a group of pins and drills are provided sterile.

The NextAR™ Spine Platform aids the surgeon in executing the surgical plan by visualizing all the information in real time on a screen monitor.

The NextAR Spine system is a surgical navigation platform which uses the information of either an intra-operative scan or pre-operative CT in combination with an intra-operative 3D-CArm scan in order to register the spine to navigation elements.

The registration can be performed with one of the following approaches:

- Direct 3D: based on the use of an intra-operative 3D-CArm scan
- 3D-3D: based on the use of a pre-operative CT scan and an intra-operative 3D-CArm scan

The system's navigation technology is based on an active infrared camera coupled with an active tracker (Target). These elements allow, by means of the different registration approaches and use of compatible instruments, to accurately prepare trajectories in the vertebrae and/or to implant screws while visualizing information in real time on a screen monitor.

V. Indications for Use

The NextAR Spine platform is intended as an aid for precisely locating anatomical structures in either open/mini-open or percutaneous spine procedures. It is indicated for any medical condition in which the use of stereotaxic surgery may be appropriate, when reference to a rigid anatomical structure, such as vertebrae or pelvis, can be identified relative to images of the anatomy. This can include the following spinal implant procedures, such as:

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VI. Comparison of Technological Characteristics

The NextAR™ Spine Platform and the predicate- Stealth Station system, K170011, share the following characteristics:

- principle of operation;
- user interface;
- power source;
- main system components;
- use of surgical instruments for navigation;
- accuracy;
- use of active optical tracking system
- computer hardware;
- pre-operative patient anatomy data acquisition.
- intra-operative patient anatomy data acquisition

The NextAR™ Spine Platform and the predicate NextAR™ TKA Platform K193559 and K202152 share the following characteristics:

- power source;
- optical tracking system
- platform;
- use of surgical instruments for navigation;

The NextAR™ Spine Platform and the predicate Stealth Station system, K170011, are technologically different with respect to:

- Active infrared Camera Target vs Passive infrared Camera Target

The NextAR™ Spine Platform and the predicate NextAR™ TKA Platform K193559 and K202152 are different with respect to:

- Intended use and indication
- Surgical flow
- intra operative scan
- Dedicated algorithm
- Target dimension

Discussion

There are minor differences between the subject and predicate devices; these differences are concerning optical tracking system, dedicated algorithm and intended use. They do not raise different questions of safety or effectiveness when compared to the predicate device. Both navigation systems utilize stereotaxic technologies. Minor differences are addressed by performing cadaveric testing and rational testing.

VII. Performance Data

Testing was conducted according to written protocols with acceptance criteria that were based on standards. The following studies were performed in support of a substantial equivalence determination:

- Software validation;
- Accuracy test
- Biocompatibility per ISO 10993-1:2009;
- Sterilization validation;
- Shelf-life testing;
- Shipping test
- Electrical safety testing per IEC 60601-1:2005, COR1:2006, COR2:2007, Amd1:2012;
- Electromagnetic compatibility testing per IEC 60601-1-2:2014;
- Performance testing to evaluate mechanical and optical properties.
- Cadaver study.

VIII. Conclusion

The information provided above supports that the NextAR™ Spine Platform is substantially equivalent to the identified predicate devices.

Substantial equivalence has been demonstrated through a comparison of intended use, design and technological characteristics, as well as performance evaluations. The NextAR™ Spine Platform can be considered substantially equivalent to the identified predicate devices.