December 12, 2018

Cook Incorporated
Hui Ouyang
Official Correspondent
750 Daniels Way
Bloomington, Indiana 47404

Re: DEN170055
Trade/Device Name: Retrograde Intubation Set
Regulation Number: 21 CFR 868.5095
Regulation Name: Retrograde intubation set
Regulatory Class: Class II
Product Code: QCX
Dated: September 21, 2017
Received: September 25, 2017

Dear Hui Ouyang:

The Center for Devices and Radiological Health (CDRH) of the Food and Drug Administration (FDA) has completed its review of your De Novo request for classification of the Retrograde Intubation Set, a prescription device under 21 CFR Part 801.109 with the following indications for use:

> The Retrograde Intubation Set is intended to assist in intubation during difficult or emergency airway access procedures in adult and pediatric patients.
>
> The 6 French catheter is recommended for use with a single-lumen endotracheal tube with an inner diameter of 2.5 mm or larger.
>
> The 11 French catheter is recommended for use with a single-lumen endotracheal tube with an inner diameter of 4 mm or larger.
>
> The 14 French catheter is recommended for use with a single-lumen endotracheal tube with an inner diameter of 5 mm or larger.
>
> When used for high pressure oxygenation with a Luer Lock connector, the 14 French catheter is recommended for patients older than 12 years of age.

FDA concludes that this device should be classified into Class II. This order, therefore, classifies the Retrograde Intubation Set, and substantially equivalent devices of this generic type, into Class II under the generic name retrograde intubation device.

FDA identifies this generic type of device as:

> **Retrograde intubation device**. A retrograde intubation device is a prescription device used to perform retrograde intubation via the cricothyroid membrane. The device may contain or be labeled for use with guidewires and intubating catheters, in addition to needles (21 CFR 868.5090), syringe (21 CFR 880.5860), and hemostats (21 CFR 878.4800).

Section 513(f)(2) of the Food, Drug and Cosmetic Act (the FD&C Act) was amended by section 607 of the Food and Drug Administration Safety and Innovation Act (FDASIA) on July 9, 2012. This law provides two options for De Novo classification. First, any person who receives a "not substantially equivalent" (NSE) determination in response to a 510(k) for a device that has not been previously classified under the Act may request FDA to make a risk-based classification of the device under section 513(a)(1) of the Act. On December 13, 2016, the 21st Century Cures Act removed a requirement that a De Novo request be submitted within 30 days of receiving an NSE determination. Alternatively, any person who determines that there is no legally marketed device upon which to base a determination of substantial equivalence may request FDA to make a risk-based classification of the device under section 513(a)(1) of the Act without first submitting a 510(k). FDA shall, within 120 days of receiving such a request, classify the device. This classification shall be the initial classification of the device. Within 30 days after the issuance of an order classifying the device, FDA must publish a notice in the Federal Register announcing the classification.

On September 25, 2017, FDA received your De Novo requesting classification of the Retrograde Intubation Set. The request was submitted under section 513(f)(2) of the FD&C Act. In order to classify the Retrograde Intubation Set into class I or II, it is necessary that the proposed class have sufficient regulatory controls to provide reasonable assurance of the safety and effectiveness of the device for its intended use. After review of the information submitted in the De Novo request FDA has determined that, for the previously stated indications for use, the Retrograde Intubation Set can be classified in class II with the establishment of special controls for class II. FDA believes that class II (special) controls provide reasonable assurance of the safety and effectiveness of the device type. The identified risks and mitigation measures associated with the device type are summarized in the following table:

Identified Risks to Health	Mitigation Measures
Failure to intubate and ventilate (continued hypoxia)	Non-clinical performance testing Labeling
Tissue damage/trauma resulting in, for example: • Bleeding, hematoma • Subcutaneous emphysema • Pneumomediastinum or pneumothorax • Damage to trachea, esophagus, and vocal cords	Non-clinical performance testing Labeling
Infection	Sterilization validation Shelf-life testing
Adverse tissue reaction	Biocompatibility evaluation

In combination with the general controls of the FD&C Act, the Retrograde Intubation Set is subject to the following special controls:

Special Controls
(1) Non-clinical performance testing must demonstrate that the device performs as intended under anticipated conditions of use, including the following: A. Wire guide tensile, flex, fracture, and corrosion testing; B. Catheter tensile strength testing at likely points of failure; C. Catheter kink radius testing; D. Compatibility of device components that interact, including compatibility in connection, disconnection, and ability to transfer fluids; E. Dimensional validation; F. Accuracy testing of markings; G. Validation of the maximum airway pressure. (2) Performance data must support the shelf life of the device by demonstrating continued sterility, package integrity, and device functionality over the identified shelf life. (3) The device must be demonstrated to be biocompatible. (4) Labeling must include: A. Instructions for use; and B. Package labels that clearly identify the minimum compatible size of endotracheal tube.

In addition, this is a prescription device and must comply with 21 CFR 801.109.

Section 510(m) of the FD&C Act provides that FDA may exempt a class II device from the premarket notification requirements under section 510(k) of the FD&C Act, if FDA determines that premarket notification is not necessary to provide reasonable assurance of the safety and effectiveness of the device type. FDA has determined premarket notification is necessary to provide reasonable assurance of the safety and effectiveness of the device type and, therefore, the device is not exempt from the premarket notification requirements of the FD&C Act. Thus, persons who intend to market this device type must submit a premarket notification containing information on the Retrograde Intubation Set they intend to market prior to marketing the device.

Please be advised that FDA's decision to grant this De Novo request does not mean that FDA has made a determination that your device complies with other requirements of the FD&C Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the FD & C 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/CombinationProducts/GuidanceRegulatoryInformation/ucm597488.htm); 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 FD & C Act); 21 CFR 1000-1050.

A notice announcing this classification order will be published in the Federal Register. A copy of this order and supporting documentation are on file in the Dockets Management Branch (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Room 1061, Rockville, MD 20852 and are available for inspection between 9 a.m. and 4 p.m., Monday through Friday.

As a result of this order, you may immediately market your device as described in the De Novo request, subject to the general control provisions of the FD&C Act and the special controls identified in this order.

For comprehensive regulatory information about medical devices and radiation-emitting products, please see Device Advice (https://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/) and CDRH Learn (http://www.fda.gov/Training/CDRHLearn). 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 (http://www.fda.gov/DICE) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

If you have any questions concerning the contents of the letter, please contact Nam To at 301-796-4634.

Sincerely,

Angela C. Krueger -S

Angela C. Krueger
Deputy Director, Engineering and Science Review
Office of Device Evaluation
Center for Devices and Radiological Health