April 7, 2021

AMO Manufacturing USA, LLC
Laarni Ricafort
Project Manager, Regulatory Affairs
510 Cottonwood Drive
Milpitas, CA 95035

Re: K210701
Trade/Device Name: CATALYS® Precision Laser System
Regulation Number: 21 CFR 886.4390
Regulation Name: Ophthalmic Laser
Regulatory Class: Class II
Product Code: OOE
Dated: March 7, 2021
Received: March 9, 2021

Dear Laarni Ricafort:

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 and Part 809); 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,

Charles Chiang -S

LT Charles Chiang
Assistant Director
DHT1A: Division of Ophthalmic 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: 06/30/2023
See PRA Statement below.

510(k) Number *(if known)*
K210701

Device Name
CATALYS® Precision Laser System

Indications for Use *(Describe)*
The CATALYS® Precision Laser System is indicated for use in patients undergoing cataract surgery for removal of the crystalline lens. Intended uses in cataract surgery include anterior capsulotomy, phacofragmentation, and the creation of single plane and multi-plane arc cuts/incisions in the cornea, each of which may be performed either individually or consecutively during the same procedure.

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: K210701

[807.92(a)(1)] Submitter Information

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Date Summary Prepared: March 5, 2021

[807.92(a)(2)] Name of Device

Device Trade Name: CATALYS® Precision Laser System

Common Name: Ophthalmic laser

Device Classification: Class II

Regulation Number: 21 CFR 886.4390

Classification Name: Ophthalmic Femtosecond Laser

Product Code: OOE

[807.92(a)(3)] Legally Marketed Devices

Predicate Device: CATALYS® Precision Laser System
(K200056, May 18, 2020)

[807.92(a)(4)] Device Description

Device Description: Catalys® Precision Laser System ophthalmic surgical laser system used in healthcare facilities such as hospitals, Ambulatory Surgery Centers (ASCs) and surgeon office settings. The System is an electromedical device that

contains software. System components include a single-use Liquid Optics™ Interface and optional Mobile Patient Bed.

The Catalys® Precision Laser System (also referred to as the Catalys® System or System) is an ophthalmic surgical laser system indicated for use in cataract surgery to create a precise anterior capsulotomy and/or to effect lens fragmentation, thus facilitating efficient lens removal. The System also creates single plane and multi-plane arc-cuts/incisions in the cornea, each of which may be performed either individually or consecutively during the same procedure. The System employs femtosecond ("FS") laser technology with integrated Optical Coherence Tomography ("OCT"), all of which are controlled and monitored by dedicated electronics. The System utilizes a common optical path for the OCT and femtosecond treatment laser (including the three-dimensional scanner and Liquid Optics™ [patient] Interface). As such, the beams are intrinsically co-registered and provide for precise overlap between imaging and treatment beams. Ocular surfaces recognized by the system software include anatomy within the anterior chamber, such as the anterior and posterior corneal surfaces and the anterior and posterior surfaces of the crystalline lens. Detailed axial or sagittal cross-sectional views are available via OCT, to demarcate proposed incisions versus adjacent ocular structures (for example, iris, pupil and limbus).

The Catalys® Precision Laser System laser classification per 21 CFR 1040.10 and 1040.11 is Class 4.

[807.92(a)(5)] Intended Use

Indications for Use:

The Catalys® Precision Laser System is indicated for use in patients undergoing cataract surgery for removal of the crystalline lens. Intended uses in cataract surgery include anterior capsulotomy, phacofragmentation, and the creation of single plane and multi-plane arc cuts/incisions in the cornea, each of which may be performed either individually or consecutively during the same procedure.

Difference in Indications from Primary Predicate Device

The subject device and predicate device have the same indications for use.

[807.92(a)(6)] Technical Characteristics

Technological Characteristics:

Both the subject and the predicate Catalys® System utilize the same spectral-domain OCT technology. The OCT acquires and analyzes cross-sectional tomograms of the anterior eye segment, including the iris and the anterior and posterior surfaces of both the cornea and lens capsule. The OCT three-dimensional volumes of the eye are then used to guide the Catalys laser system effectively, to deliver precise and accurate laser pulses for capsulotomy, phacofragmentation of the crystalline lens and single plane and multi-plane arc cuts/incisions in the cornea. The integrated OCT component of the System provides not only for anatomical relationships, but also provides essential information regarding the orientation of these anterior segment areas of interest relative to the System, to ensure safe and accurate delivery of the laser energy.

The predicate and subject devices both use the same type of femtosecond treatment laser to create an anterior capsulotomy, to perform phacofragmentation of the crystalline lens, and to create single plan and multi-plane arc cuts/incisions in the cornea by scanning individual pulses of laser energy in a pre-defined pattern. The mechanism of laser cutting is the same in that the ultra-short laser pulses create a highly localized plasma and subsequent cavitation event that disrupts only microns of tissue. The location of the tissue photo-disruption is controlled in both systems by moving the focus of the laser beam to the beam through a three-dimensional pattern to produce the intended cut/incision.

Similarities and Differences:

The Catalys Precision Laser System is unchanged with regard to its technological characteristics, indications for use, and intended use. The modifications to the Mobile Patient Bed are limited to:

1. Electronics/Circuits Changes;
2. Battery/Charging Changes;
3. Firmware/FPGA Changes;
4. Mechanical Changes; and
5. Minor Packaging Changes

These changes do not impact the safety and efficacy of the proposed Mobile Patient Bed and raise no new questions of safety and efficacy as a result of these differences.

The following table provides a comparison of the predicate device versus the proposed device for the purpose of demonstrating substantial equivalence to the predicate devices for its indication for use, intended use and technological characteristics

Similarities and Differences Between Cleared Predicate Devices and Subject Device

Attribute	Predicate Device	Proposed Device
510(k) Number	K200056	This application
Regulation Number	886.4390	Same
Regulation Name	Ophthalmic Laser	Same
Regulatory Class	Class II	Same
Product Code	OOE	Same
Indications for Use	The Catalys® Precision Laser System is indicated for use in patients undergoing cataract surgery for removal of the crystalline lens. Intended uses in cataract surgery include anterior capsulotomy, phacofragmentation, and the creation of single plane and multi-plane arc cuts/incisions in the cornea, each of which may be performed either individually or consecutively during the same procedure.	Same
System Type	Ophthalmic Femtosecond Laser with Spectral Domain OCT	Same
Laser Mechanism of Action	Plasma, Cavitation	Same
Treatment Laser Wavelength (nm)	1030 ±5	Same
Output Power, Max	Per ISO 15004-2:2007 limits	Same
Maximum Pulse Energy (µJ)	10	Same
Repetition Rate (kHz)	9-120	Same
Pulse Duration (fs)	< 600	Same
Spot Size; diameter (µm)	5	Same
System controls	Microprocessor with Graphical User Interface	Same
Patient Contact Interface	Suction-ring type interface devices (marketed as Liquid Optics™ Interface) Sterile and	Same

Attribute	Predicate Device	Proposed Device
	Single-use Cleared on K141079 & K170322	
LOI Suction Ring Seal Diameters (mm)	LOI External (mm): 21.6 Internal (mm): 14.1 LOI-12 External (mm):19 Internal (mm):12	Same
	0180-1401 External (mm): 21.6 Internal (mm): 14.1 0180-1201 External (mm): 19 Internal (mm): 12	Same
Patient Interfaces	Patient Chair or Mobile Patient Bed	Same
Patient Interfaces communication interface	Patient Chair Wired connection to Catalys System Mobile Patient Bed Wireless (Bluetooth) connection to Catalys System	Same

Attribute	Predicate Device	Proposed Device
Mobile Patient Bed Key Design Characteristics	**Electronics/Circuits** • **Z-Motors** Inconsistent motor output between MPB's when lifting maximum weight • **Battery/Charging** Internally designed charging and battery circuit **Firmware/FPGA** • No data logging capability **Mechanical** • Capacitive touch buttons on pendant • Armrest attached to center of seat • Complex headrest assembly with multiple articulation points	**Electronics/Circuits** • **Z-Motors** Consistent motor output between MPB's when lifting maximum weight • **Battery/Charging** Vendor provided battery management module **Firmware/FPGA** • Diagnostic data logging (only field service accessible) **Mechanical** • Tactile membrane switches on pendant • Armrest attached to seat near backrest • Simpler headrest assembly with only one articulation points
OCT Axial Resolution (µm)	30	Same
OCT transverse Resolution (µm)	15	Same
Scan speed (A-scans/sec)	1000	Same
A-scan depth (nm)	2	Same
Optical Source (nm)	820-930	Same
Optical Power	ANSI Class 1 < 3.48mW at cornea	Same
Iris Imaging	Live iris view	Same
Trajectory Timing Synchronization	FPGA coordinates from one non-reentrant VI	Same
Communication Method for Watchdog for Host PC with the Mobile Patient Bed Pairing	Direct FPGA Interface	Same

[807.92(b)(1)] Determination of Substantial Equivalence	
Non-Clinical Performance Data:	Design verification and validation testing was performed to verify the ability of the modified Mobile Patient Bed to meet its intended use with the Catalys System and to ensure that no adverse effects have been introduced due to the changes. This testing included subsystem level verification and regression testing, as well as system validation using the latest Catalys System software, and Liquid Optics Interface. The testing conducted and presented for the subject device, provides reasonable assurance that the System remains substantially equivalent for its intended use and furthermore, that it is substantially equivalent to the identified predicate device
Clinical Performance Data:	Clinical Data was deemed not necessary for the Catalys® Precision Laser System. The performance data demonstrated that the device performs as intended. The proposed device does not include any changes to the indications for use or intended use of the primary predicate device. It does not introduce any new harms or unacceptable risks, and therefore does not require clinical testing to assess safety and performance or to demonstrate equivalence.

[807.92(b)(3)] Conclusion	
Conclusions from Non-Clinical and Clinical Tests:	The Catalys Precision Laser System with the proposed modifications to the Mobile Patient Bed and labeling changes have the same intended use, indications for use and the same fundamental and scientific technology as the predicate device. Therefore, the Catalys Precision Laser System with the proposed modifications to the Mobile Patient Bed and labeling is substantially equivalent to the predicate device.