



AUG - 4 2005

Medical Device Tracking Order

Food and Drug Administration  
Center for Devices and  
Radiological Health  
2098 Gaither Road  
Rockville MD 20850

Ms. Kristina Simmons, M.S., R.A.C.  
Senior Regulatory Affairs Specialist  
Medtronic, Inc.  
7000 Central Avenue NE  
Minneapolis, Minnesota 55432-3576

RE: PMA No. P030036      Cardiovascular permanent implanted pacemaker electrode

Dear Ms. Simmons:

You are notified by this letter of your obligation to adopt a method of tracking for the devices referenced above, as authorized by section 519(e) of the Federal Food, Drug, and Cosmetic Act, (the Act) as amended by section 211 of the Food and Drug Administration Modernization Act of 1997 (FDAMA). The implementation of section 519(e) of the Act, as amended, requires the Food and Drug Administration (FDA) to issue an order to manufacturers when FDA determines that a person who manufactures and distributes a device meets the relevant statutory requirements and tracking is required to protect the public health. This order is effective immediately.

Section 519(e) of the Act, as amended, states that FDA, "...may by order require a manufacturer to adopt a method of tracking a class II or class III device—

- (A) the failure of which would be reasonably likely to have serious adverse health consequences; or
- (B) which is—
  - (i) intended to be implanted in the human body for more than one year, or
  - (ii) a life sustaining or life supporting device used outside a device user facility."

As you know, the corresponding medical device tracking regulations, found in Title 21 Code of Federal Regulations (CFR) Part 821, are intended to ensure that tracked devices can be traced from the device manufacturing facility to the person by whom the device is intended to be used when patient notification (under section 518(a) of the act) or device recall (under section 518(e) of the act) actions are ordered by the agency. The device tracking requirements for exemptions and variances, system and content requirements of tracking, the obligations of persons other than device manufacturers, such as distributors, records and inspection requirements, confidentiality, and record retention requirements, which were published in the Federal Register on August 16, 1993, remain in effect. (21 CFR sections 821.2, 821.25, 821.30, 821.50, 821.55 and 821.60, copy enclosed.)

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This order to adopt a tracking method does not change your obligations concerning other existing FDA regulations affecting your device. FDA published in the Federal Register on February 28, 2002, an amendment to the final rule to revise the scope of the regulation and add certain patient confidentiality requirements, and non-substantive changes to remove outdated references and simplify terminology. (67 FR 6943) Please contact Chet Reynolds in the Office of Compliance at (240) 276-0157 ext. 165 if you need specific guidance. Other general information on your responsibilities under the Act, or more specific information, such as non-binding guidance on medical device tracking, may be obtained from the Division of Small Manufacturers, International, and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597, or at the internet address [www.fda.gov/cdrh](http://www.fda.gov/cdrh).

Sincerely yours,

*for*   
Timothy A. Ulatowski  
Director  
Office of Compliance  
Center for Devices and  
Radiological Health

Enclosure