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CENTER FOR DEVICES AND RADIOLOGICAL HEALTH

MEDICAL DEVICES ADVISORY COMMITTEE

CIRCULATORY SYSTEM DEVICES ADVISORY PANEL

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MEETING

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TUESDAY. DECEMBER 5, 2000

The Panel met at 8:00 a.m. in the Grand Ballroom of the Gaithersburg Holiday Inn, Two Montgomery Village, Gaithersburg, Maryland, Dr. Cynthia M. Tracy, Acting Chairperson, presiding.

Present:

CYNTHIA M. TRACY, M.D., Acting Chairperson SALIM AZIZ, M.D., Consultant MICHAEL D. CRITTENDEN, M.D., Member ROBERT A. DACEY, Consumer Representative MICHAEL DOMANSKI, M.D., Consultant RENEE HARTZ, M.D., Member GARY JARVIS, Industry Representative MITCHELL KRUCOFF, M.D., Consultant WARREN LASKEY, M.D., Consultant TONY SIMMONS, M.D.. Consultant MEGAN MOYNAHAN, Executive Secretary

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David Schwartzman, M.D., University of Pittsburgh Medical Center
FDA Presentation and Questions for the Panel
Doris Terry, lead reviewer, Food and Drug Administration
Open Committee Discussion , Cynthia Tracy, M.D., Acting Chairperson
Adjourn

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1	PROCEEDINGS
2	8:06 a.m.
3	DR. TRACY: I'd like to call to order this
4	meeting of the Circulatory System Devices Panel.begin
5	by reading the Conflict.
6	MS. MOYNAHAN: I'd like to begin by
7	reading the Conflict of Interest Statement for today.
8	The following announcement addresses conflict of
9	interest issues associated with this meeting and is
10	made part of the record to preclude even the
11	appearance of an impropriety. The Agency reviewed
12	this admitted agenda for this meeting and all
13	financial interests reported by the Committee
14	participants to determine if any conflict existed.
15	The Conflict of Interest Statue prohibits special
16	government employees from participating in matters
17	that could affect their or their employer's financial
18	interests. However, the Agency has determined that
19	the participation of certain members and consultants,
20	the need for whose services outweighs the potential
21	conflict of interest involved is in the best interest
22	of the government. The Agency would like to note,

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therefore, that a waiver is currently on file for Dr. 1 2 Renee Hartz for her interest in a firm that could potentially 3 affected be by this Panel's recommendations. 4 A copy of this waiver may be obtained from 5 6 the Agency's Freedom of Information Office, Room 12A-15 of the Parklawn Building. 7 For the record, we wish to note that the 8 9 Agency also took into consider other matters regarding 10 Drs. Cynthia Tracy, Salim Aziz, Mitchell Krucoff and Warren Laskey. These Panelists reported interest in 11 firms at issue, but in matters that are not related to 12 13 today's agenda or have now been completed. The Agency has determined, therefore, that they may participate 14 15 fully in all discussions. 16 In the event that the discussions involve any other products or firms not already on the agenda, 17 18 for which an FDA participant has a financial interest, the participant should excuse him or herself from such 19 involvement and the exclusion will be noted for the 20 21 record.

With respect to all other participants, we

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1 ask in the interest of fairness that all persons making statements or presentations, disclose any 2 current or previous financial involvement with any 3 4 firm whose products they may wish to comment upon. 5 DR. TRACY: Can I ask the Panel Members to 6 please introduce themselves? 7 MR. JARVIS: Gary Jarvis, Industry Representative. 8 DR. 9 KRUCOFF: Mitch Krucoff, Duke 10 University Medical Center, Cardiology Division. DR. DOMANSKI: 11 Mike Domanski, Cardiologist, NHLBI. 12 DR. LASKEY: Warren Laskey, Cardiologist, 13 14 the University of Maryland. MS. MOYNAHAN: Megan Moynahan, Executive 15 Secretary of the Circulatory System Devices Panel. 16 17 DR. TRACY: Cynthia Tracy, Electrophysiologist, Georgetown University Hospital. 18 DR. CRITTENDEN: 19 Michael Crittenden, Cardiac Surgeon, Harvard University. 20 21 DR. AZIZ: Salim Aziz, Cardiac Surgeon, University of Colorado. 22 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVENUE, N.W.

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1	DR. SIMMONS: Tony Simmons, Cardiologist,
2	Wake Forest University.
3	MR. DACEY: Robert Dacey, Longmont,
4	Colorado, Consumer Representative.
5	MR. DILLARD: Jim Dillard. I'm the
6	Director of the Division of Cardiovascular and
7	Respiratory Devices, Food and Drug Administration.
8	MS. MOYNAHAN: I'd like to read the
9	appointment to temporary voting status for today.
10	Pursuant to the authority granted under the Medical
11	Devices Advisory Committee Charter, dated October 27,
12	1990, as amended April 18, 1999, I appoint the
13	following people as voting members of the Circulatory
14	System Devices Panel for this meeting on December 5,
15	2000: Cynthia Tracy, Salim Aziz, Warren Laskey, Tony
16	Simmons, Mitchell Krucoff and Michael Domanski.
17	In addition, I appoint Dr. Cynthia Tracy
18	to act as Temporary Chair for the duration of this
19	meeting.
20	For the record, these people are special
21	government employees and are consultants to the Panel
22	under the Medical Devices Advisory Committee. They
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1 have undergone the customary conflict of interest review and have reviewed the material to be considered 2 3 at this meeting. Signed, David W. Feigal, Director, Center for Devices and Radiological Health. 4 5 DR. TRACY: At this point we'll move to 6 the open public hearing. There are scheduled 7 speakers, but if there's anybody who would like to present some data or information, please identify 8 9 yourself and come to the microphone. 10 (Pause.) 11 In that case, we'll begin with the sponsor 12 presentation and I'd like to remind the speakers to introduce yourselves and state any conflict 13 of 14 interest you have and also whether you have an honorarium for today's presence or travel award. 15 16 DR. STANTON: Good morning. I'm Dr. I'm Medical Director for the 17 Marshall Stanton. Medtronic Cardiac Rhythm Management Division and for 18 the record I'm an employee of Medtronic. 19 On behalf of Medtronic, I want to thank 20 everyone for taking the time to review our submission 21 of the Model 7250 Jewel® AF for the "AF Only" clinical 22 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS

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1 || evaluation.

2	This is the Model 7250 Jewel® AF and I
3	want to begin by emphasizing that this is the exact
4	same model that this Panel reviewed and recommended
5	for approval, and FDA did grant approval earlier this
6	year for the indication of ventricular
7	tachyarrhythmias with or without concomitant atrial
8	arrhythmias. We're here today requesting an expansion
9	of that indication.
10	The Model 7250 Jewel® AF is a ventricular
11	ICD. It can detect and treat ventricular arrhythmias.
12	It's comparable to other Medtronic ventricular ICDs.
13	Additionally, it has features that are
14	intended for the treatment, prevention and monitoring
15	of atrial tachyarrhythmias. For termination of atrial
16	tachyarrhythmias it has pacing therapies including
17	antitachycardia pacing and high frequency burst
18	pacing.
19	It also has the capability of delivering
20	atrial shocks. The atrial shocks can be delivered
21	automatically or can be patient-activated. For
22	automatic shocks, the time of delivery can be
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1 programmed in such that for example the shock can be 2 delivered in the middle of the night while the patient The patient-activated shocks allows 3 is asleep. patients to deliver an atrial shock when they choose. 4 The Jewel® AF will not allow delivery of 5 6 a patient-activated atrial shock unless it confirms 7 that the patient is indeed in an atrial tachyrhythmia. 8 The algorithms designed for prevention include atrial rate stabilization which functions to 9 10 prevent the pause that typically would occur after an 11 atrial premature complex and switchback delay which 12 allows a gradual reduction in rate after determination 13 of an atrial arrhythmia. The device also has memory capability for storage of both asymptomatic as well as 14 15 symptomatic episodes of atrial and ventricular arrhythmias. 16

These are the patient activators. This is the 9464 and this is the 9465. The 9465 is a downsized version of the 9464. The patient activator or patient assistant allows the patient to self-administer atrial shocks for termination of atrial arrhythmias.

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1	The 9464 was used during this clinical
2	study. We are submitting those data for and asking
3 .	for approval of the 9465. Also, as part of this
4	submission, we're seeking approval of the Model 6937A,
5	defibrillation lead. This is a 9 French unipolar,
6	high voltage lead that's designed for placement in the
7	coronary sinus or the superior vena cava. It does not
8	do pacing or sensing. It's similar to the already
9	approved 6937 SVC lead, except that its defibrillation
10	coil is five centimeters compared with seven
11	centimeters and it has additional insulation for added
12	stiffness.
13	I want to emphasize again that the Model
14	7250 Jewel® AF is already approved for use in ICD
15	patients either with atrial tachyarrhythmias or those
16	who are at significant risk of developing atrial
17	tachyarrhythmias.
18	Based on the results of our clinical
19	trial, we propose the final indication for use. The
20	Jewel® AF system is intended to provide pacing,
21	cardioversion and defibrillation for treatment of
22	patients with symptomatic, drug refractory atrial
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tachyarrhythmias and/or life threatening ventricular tachyarrhythmias.

I believe that device-based therapy for 3 4 atrial tachyarrhythmias is part of an overall treatment strategy that physicians can offer to a very 5 6 specific patient population. That is, those with 7 symptomatic drug refractory atrial tachyarrhythmias. 8 We estimate that this would compose approximately 5 9 percent of the total atrial defibrillation population 10 and it is specifically designed for patients who need more control of their arrhythmia. The device also 11 provides monitoring capability to provide information 12 to clinicians. 13

14 Our presentation today will consist of the 15 clinical study results which will be presented by Dr. 16 Michael Gold of the University of Maryland. This will 17 be followed by some brief case presentations by Dr. David Schwartzman of the University of Pittsburgh. We 18 19 also have available, if you have questions, Dr. David 20 Newman from the University of Toronto who has performed the Quality of Life Analysis that's part of 21 And finally, there are additional 22 the submission.

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1	people available from Medtronic to answer any other
2	questions that you may have.
3 -	At this point I'd like to turn this over
4	to Dr. Michael Gold.
5	DR. GOLD: Thank you and good morning.
6	Again, I'm Michael Gold from the University of
7	Maryland. I have no financial interest in either this
8	device or this company. I am being reimbursed for my
9	travel and paid an honorarium for my presentation this
10	morning.
11	As mentioned, I am here to summarize the
12	results of the Model 7250 Jewel® AF, "AF Only" Study
13	which was recently completed. The purpose of this
14	study was to demonstrate the safety and efficacy of
15	this device in a specific patient population suffering
16	from symptomatic drug refractory atrial
17	tachyarrhythmias, but who were without standard
18	ventricular ICD indications.
19	This was a multi-center IDE study with
20	prospective follow up to evaluate the safety and
21	efficacy of this treatment therapies. There was also
22	a randomized crossover component of this study, the
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1 evaluation of prevention therapies. That included 2 three month periods in which prevention therapies, 3 both of them were programmed on and three months when both of the prevention therapies were programmed off. 4 To be included in this study, patients 5 needed to have experienced at least two episodes of 6 atrial fibrillation and flutter within the previous 7 three months and at least one of those episodes had to 8 be documented electrocardiographically. The episodes 9 10 were required to be symptomatic. 11 In addition, patients were required to be refractory or intolerant to anti-arrhythmic drugs. 12 13 Patients were required to have failed at least one 14 anti-arrhythmic drug for inclusion in the study. 15 Finally, patients were required to be in sinus rhythm at the time of implantation. For those 16 17 patients who in atrial were fibrillation, 18 cardioversion could be performed, but they needed to maintain sinus rhythm for at least one hour before 19 20 they could be enrolled in the study and implanted with 21 the device.

With regard to the exclusion criteria,

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patients were excluded if they were in chronic atrial 1 fibrillation which was defined as the inability of 2 maintaining sinus rhythm for at least one hour. They 3 were also excluded for a history of uncontrolled 4 5 angina, history а of sustained ventricular tachyarrhythmias. They were excluded if they had New 6 York Heart Association Class IV heart failure or 7 cardiac surgery within the previous one month. 8 9 For safety reasons, patients were also excluded if there was any evident of atrial thrombus 10 detected within the preceding six months prior to 11 implant, or if they had had a history of a stroke 12 13 within the preceding one year. 14 Finally, patients were excluded if they 15 were unwilling to give informed consent, if they had a mechanical tricuspid valve which precluded the 16 placement of leads for this device, or if they had a 17 18 life expectancy less than one year. One hundred forty-four patients 19 were implanted out of the 146 patients who were enrolled in 20 21 this study. The study ran from November 1997 to 22 November 1999. There were 107 implants in the United

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1	States, 33 in Europe, and 6 in Canada. Of the two
2	patients who did not get implanted, one had high
3	atrial pacing thresholds and no place to be able to
4	adequately pace the atrium could be found. The second
5	patient had unacceptably high ventricular
6	defibrillation thresholds. One of these patients was
7	from Europe. One of these patients was from the
8	United States.
9	With regard to the data base for follow
10	up, the cut off date was May 31, 2000 which allowed
11	for a mean follow up of just over one year. The
12	cumulative patient follow up was 1,835 months.
13	The patient characteristics for this
14	population is show on this slide. It's a fairly
15	typical population of those with atrial fibrillation.
16	Seventy-one percent of the patients were male. The
17	mean age was 62 years and about a third of patients
18	had a history of coronary artery disease.
19	Myocardial infarction had occurred
20	previously in 19 percent of patients and 29 percent of
21	patients had a history of congestive heart failure.
22	The mean left ventricular ejection fraction was 51

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percent, including 31 percent of patients with ejection fractions less than 40 percent. And a mean left atrial size was 46 millimeters.

4 With regard to the characteristics of the atrial fibrillation, 35 percent of patients had 5 paroxysmal atrial fibrillation which initiated and 6 7 terminated spontaneously, while the remaining 65 percent of patients had incessant atrial fibrillation 8 9 which was defined as that atrial fibrillation which 10 required cardioversion, also often referred to as 11 persistent atrial fibrillation.

The primary arrhythmic indication for device implantation was atrial fibrillation in nearly three quarters of patients. In 23 percent of patients, there was a history of atrial fibrillation and atrial flutter. And only 3 percent of patients in this study had a history of atrial flutter only.

The primary objectives of this study were divided into safety and efficacy criteria. With regard to safety the objective was to estimate the relative risk of a system or procedure related complication for the Model 7250, using as a control

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the Model 7219D which is a single chamber ventricular 1 2 defibrillator which was the only available comparable data base at the time that this study was initiated. 3 4 The hypothesis was that the 95 percent upper confidence bound would be less than 3.0 to meet 5 the primary objective. 6 With regard to efficacy, the objective was 7 8 to estimate the efficacy of atrial tachyrhythmia termination therapies for this device in this patient 9 10 population, hypothesizing 95 a percent lower confidence bound would be greater than 75 percent for 11 12 episodes that incorporated shocks as part of the 13 treatment strategy. 14 With regard to the comparison of 15 historical controls, as already mentioned, this was performed with the 7219 16 Jewel® PCD ventricular 17 defibrillator. The primary safety endpoint which was 18 complication-free survival was compared between the 19 two devices. The secondary objective was to compare 20 survival from all-cause mortality. 21 Because these were somewhat different 22 populations, ventricular defibrillator one of NEAL R. GROSS

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population and the other an atrial tachyrhythmia
 population, there was adjustment for differences in
 baseline patient characteristics in the two
 populations using Multi-variate Cox Proportional
 Hazards Regression Models.

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6 The variables that went into the final 7 model to evaluate complication-free survival were the 8 region in which the patients lived, their gender, the 9 presence of coronary disease, hypertension, cardio-10 myopathy, New York Heart Association Class, previous 11 bypass surgery and a history of sustained ventricular 12 tachycardia.

13 The variables that went into the final model for survival from all-cause mortality was quite 14 15 similar, including gender, coronary disease, 16 myocardial infarction, hypertension, cardiomyopathy, heart failure, New York Heart Association Class, heart 17 18 surgery, both bypass surgery and valve surgery, 19 history of atrial fibrillation, history of atrial 20 flutter and sustained ventricular tachycardia. These 21 parameters were chosen for the model based on 22 univariate analysis that suggested differences in the

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two populations.

2 With the regard to primary safety 3 endpoint, the relative risk of a system or 4 procedure-related complication for the Model 7250 in this study compared with the Model 7219 Jewel® PCD was 5 6 1.31 with a lower confidence bound of 0.76 and an upper 95 percent confidence bound of 2.25. Thus, the 7 safety objective was met in that this upper confidence 8 9 bound was less than 3.0.

10 If we look at the actual complications that were noted, by far and away the largest number of 11 12 complications were lead dislodgements and again, this device differed from the 7219 in that it was a dual 13 14 chamber device with an atrial lead. Most of the lead dislodgements were, in act, atrial lead dislodgements. 15 16 There were 11 lead dislodgements, 3 episodes of atrial 17 fibrillation, 2 hematomas, 2 infections and then a 18 variety of other complications which led to the total 19 of 26 complications in 23 patients.

20 With regard to the system procedure 21 related complication-free survival, at 6 months this 22 was estimated to be 86.6 percent in the present study

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of the 7250 device compared with 91.6 percent for the 1 7219D control. These differences were not statistically significant.

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This device classifies rhythms, atrial 4 rhythms as either atrial tachycardia or 5 atrial fibrillation based on both the rate and the regularity 6 7 of the rhythms. Very rapid atrial arrhythmias are 8 classified as atrial fibrillation, relatively slow 9 atrial tachyarrhythmias are classified as atrial 10 tachycardia and then in the overlap zone the rhythm is classified as either atrial tachycardia or atrial 11 fibrillation based on the regularity of the rhythm. 12 13 The programming of these zones are up to the 14 investigator and are, in fact, programmable.

15 With regard to how we defined efficacy, 16 the device classifies a successful termination of 17 therapy as five consecutive sinus beads or atrial pace beads within 3 minutes of therapy delivery without 18 redetection of another atrial tachyrhythmia. 19 The therapy efficacy are reported in two different ways. 20 The accrued proportions is simply the episodes 21 22 terminated by a specific therapy divided by the number

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of episodes treated with that type of therapy.

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To try to control for patients who may have very many episodes which disproportionately contribute to these estimates, the Generalized Estimating Equation or GEE was also computated, computed for all these endpoints which is looking at the probability that a randomly selected episode from a randomly selected patient will be terminated. Again, this corrects for multiple episodes in individual patients.

11 With regard to the primary endpoint results, there was a 91 percent efficacy for atrial 12 13 tachyrhythmia termination therapies. This was an 14 evaluation of all therapies and all episodes that had 15 at least one shock in the therapy sequence and 16 included the termination of 1,092 episodes of atrial 17 tachyarrhythmias out of 1,200 episodes in 107 The crude proportion was 91 percent as 18 patients. mentioned above. The GEE estimate was 85.9 percent 19 with a 95 percent lower confidence bound of 81.7 20 21 percent which is greater than the 75 percent postulated and therefore, the efficacy objective was 22

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2 With regard to the number of shocks 3 delivered, this slide shows the number of atrial shocks given per episode of atrial tachyrhythmia in 4 the 1200 episodes that occurred. The mean number of 5 6 shocks per episode was 1.19. A vast majority, 86 7 percent of patients only received one shock per 8 episode. Another 10 percent received two shocks. One 9 can see here it's very unlikely that patients received more than three shocks in this study. And in fact, 10 the only patients who received a sixth or the ten 11 12 shocks, those were patient-activated shocks where the patients intentionally gave themselves that many 13 14 shocks.

1

I would now like to move on to the 15 secondary objectives and additional analysis from this 16 17 study. The efficacy of atrial shocks for atrial 18 fibrillation episodes was very high; 92.4 percent of atrial fibrillation episodes were terminated with 19 shocks. This included 1,868 atrial fibrillation 20 21 episodes in 102 patients, including 723 who were treated with shocks, 668 of which were successfully 22

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terminated. The crude proportion was 92.4 percent
 with a GEE estimate of 88.4 percent.

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Of those shocks that were delivered with 3 patient-activated therapy, the efficacy of 4 this approach was 92.8 percent. This again is evaluating 5 all episodes that included at least one patient shock 6 7 in a therapy sequence, but restricted it to those in which the patient was activating shock therapy. This 8 was 519 of 559 atrial tachyrhythmia episodes, again, 9 with a crude proportion of 92.8 and a GEE efficacy 10 proportion of 89.1 percent. 11

This chart here shows the pacing efficacy 12 13 using low power, painless therapy to pace terminated arrhythmias. The overall proportions of atrial pacing 14 15 therapy using either atrial anti-tachycardia pacing or 16 high frequently burst pacing for atrial tachyarrhythmias had an efficacy of about 35 percent 17 with a GEE efficacy of 28 percent. 18

If we break that down into atrial tachyarrhythmias, the efficacy by GEE estimate was 35.5 percent of episodes were pace terminated. If we then look at pace termination of atrial fibrillation

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and of note here, this is only high frequency burst therapy, anti-tachycardia pacing could not be programmed for atrial fibrillation episodes. The termination rate was 14.1 percent by the GEE method.

5 Quality of life was followed in this cohort of patients over time. What's shown on this 6 7 slide are the SF-36 scales looking at changes over time for the eight major parameters in the SF-36. 8 9 Shown are the baseline measurements, the 3-month 10 measurements and then the 6-month measurements. One 11 can see that all eight measurements showed an increase in quality of life over the 6-month period of time and 12 13 five out of the eight parameters, this reached significance, either at 3 months or in four of the 14 15 parameters, at 3 months and 6 months, there was 16 significant improvements and increases in quality of life during the course of the first six months of this 17 device therapy. 18

Not only were there changes in quality of life, we also looked at the frequency of symptoms and the severity of symptoms, using a standardized symptom checklist score and both the frequency of symptoms and

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the severity of symptoms significantly decreased over
 the course of study, both at three months and this
 benefit persisted after 6 months.

The mortality of patients in this study was estimated as a relative risk compared to the previous control group, the 7219 as mentioned before. The adjusted relative risk for patients with the 7250 device was 0.51 in this study with a lower confidence bound of 0.12 and an upper confidence bound of 2.17.

The survival curves are shown on this slide. Not a very effective slide, but one can see the very good survival of patients in the 7250 "AF Only" cohort shown in the solid line.

Kaplan-Meier all-cause survival rates were computed for this group of patients and showed the estimated 6 month survival in this study of the 7250 "AF Only" population was 98.6 percent. The Kaplan-Meier estimates for the 7219 control was 96.4 percent at 6 months.

I'd like to move now to the detection of atrial tachyarrhythmias. There was a 98.8 percent positive predictive value for detection of atrial

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tachyarrhythmias. This included the evaluation of
4,913 spontaneous atrial episodes detected by the
device, 4,859 of which were appropriated detected as
an atrial tachyrhythmia. This gives a positive
predictive value of 98.8 and a GEE estimate of 98.6
percent.

7 Prevention therapy was evaluated in a 8 randomized portion of this study. This was an evaluation of both atrial rate stabilization and 9 10 switch back delay, two features that were incorporated 11 in this device. Seventy-five patients completed the 12 randomized portion in which they had three months of 13 these features, both being turned on or three months of these features both being turned off. 14

There was no significant difference in the prevention and the incidents of atrial fibrillation with the atrial prevention therapy.

With regard to atrial DFTs, atrial defibrillation thresholds were measured with a step up protocol, a two-tiered step up protocol. At implantation the mean atrial defibrillation threshold was 6.8 joules.

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1	Importantly, there was no incidents of
2	atrial shock induced ventricular tachycardia or
3 .	ventricular fibrillation. Specifically, there was no
4	pro-arrhythmia associated with any of the atrial
5	therapies delivered to these patients. The 95 percent
6	confidence interval for the zero percent observation
7	was zero to 0.3 percent.
8	Very interestingly, 11 patients or 7.6
9	percent of the population experienced 67 spontaneous
10	and appropriately detected episodes of ventricular
11	tachyarrhythmias. Sixteen of these episodes were
12	classified as ventricular fibrillation and 51 of these
13	episodes were classified as ventricular tachycardia.
14	Of these VT, VF episodes, 57 occurred in 6 patients
15	and were successfully treated with ventricular
16	therapies, either anti-tachycardia pacing or
17	defibrillator shocks.
18	The additional 10 episodes occurred in 5
19	patients and these terminated spontaneously, 9 to 220
20	seconds after detection. The reason why some of these
21	episodes went so long was because therapies were
22	turned off by the investigators in the ventricular

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tachycardia zone. Ventricular fibrillation therapy 1 2 was required to be on but ventricular tachycardia could be set up as a detection zone with no therapy on 3 and that's why we see some long episodes of 5 ventricular tachyarrhythmias that did not receive 6 therapy.

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7 Atrial shock programming to deliver shocks 8 to the termination of atrial tachyarrhythmias was 9 consistently programmed over the course of this study. What's shown here is that there was an 85 percent of 10 11 patients had atrial shocks programmed on at the initial baseline of this study. There was very minor 12 13 changes over the course of this study, but at least 14 contact, 85 percent of patients still at atrial shock therapy programmed on. 15

I'd like to switch now briefly to the 16 additional components of the system, specifically the 17 9464 Patient Activator. Sixty-seven patients used 18 this activator to treat 559 episodes of atrial 19 20 tachyarrhythmias. There was a 90.5 percent of 21 episodes were treated with one shock.

The success rate was 92.8 percent for the

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termination of these arrhythmias, the GEE estimate 1 there being 89.1 percent. And over 70 percent of 2 patients have patient-activated shocks programmed on 3 4 at their last contact in this study. 5 Again, if we look at the use of this activator, specifically to look at the number of 6 shocks that patients were activated for for episodes 7 8 that lasted greater than 30 minutes, this cutoff was 9 used because short duration episodes, it was very unlikely that patients would either be able to use 10 11 their activator or would want to use their activator. 12 If we look over the course of this study. 13 initially about 52.1 percent of episodes, patientactivated 14 was used for, there was slight а 15 nonsignificant dip at 42 percent at 3 to 6 months and then a persistent and consistent use of patient 16 activator over time which showed no statistical 17 18 difference over the course of this study. The GEE

> The 6937A lead was an investigational lead used as part of this study. Fifty-five percent of NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVENUE, N.W.

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estimate was 46.6 percent of all episodes greater than

30 minutes were treated with patient-activated shocks.

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1	patients in this trial, the "AF Only" trial and 7
2	percent in the VT/AT patients were implanted with this
3	lead. Of the 114 patients who received this lead, it
4	was placed in the coronary sinus in 101 of these
5	patients. The mean follow-up for this group was
6	slightly greater than one year. And there were three
7	adverse events noted, three atrial leads dislodgements
8	and subclavian vein thrombosis. The 3-month
9	complication free survival was 97.3 percent for this
10	lead. The atrial defibrillation threshold in the
11	patients who received this lead was 6.2 joules.
11 12	patients who received this lead was 6.2 joules. In summary, with regard to safety of this
12	In summary, with regard to safety of this
12 13	In summary, with regard to safety of this device, we feel that the safety objectives were met.
12 13 14	In summary, with regard to safety of this device, we feel that the safety objectives were met. The reported system procedure related complications
12 13 14 15	In summary, with regard to safety of this device, we feel that the safety objectives were met. The reported system procedure related complications are consistent with previous device studies and did
12 13 14 15 16	In summary, with regard to safety of this device, we feel that the safety objectives were met. The reported system procedure related complications are consistent with previous device studies and did not differ from the control group evaluated. The
12 13 14 15 16 17	In summary, with regard to safety of this device, we feel that the safety objectives were met. The reported system procedure related complications are consistent with previous device studies and did not differ from the control group evaluated. The system was successfully implanted in 98.6 percent of
12 13 14 15 16 17 18	In summary, with regard to safety of this device, we feel that the safety objectives were met. The reported system procedure related complications are consistent with previous device studies and did not differ from the control group evaluated. The system was successfully implanted in 98.6 percent of patients and there was no incidents of atrial
12 13 14 15 16 17 18 19	In summary, with regard to safety of this device, we feel that the safety objectives were met. The reported system procedure related complications are consistent with previous device studies and did not differ from the control group evaluated. The system was successfully implanted in 98.6 percent of patients and there was no incidents of atrial shock-induced ventricular tachyarrhythmias.
12 13 14 15 16 17 18 19 20	In summary, with regard to safety of this device, we feel that the safety objectives were met. The reported system procedure related complications are consistent with previous device studies and did not differ from the control group evaluated. The system was successfully implanted in 98.6 percent of patients and there was no incidents of atrial shock-induced ventricular tachyarrhythmias. With regard to efficacy, once again, the

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detection of atrial tachyarrhythmias. Overall, there 1 2 was a 91 percent success rate for the termination of 3 atrial arrhythmias when shock therapy was used. And 4 I think equally interesting, about one third of episodes of atrial tachyarrhythmias was successfully 5 pace-terminated with painless, low energy therapy. 6 7 Quality of life improved over time and symptom burden decreased consistently over the course 8 of this study. 9 10 Spontaneous ventricular tachyarrhythmias were detected in 11 7.6 percent of patients and 12 appropriately treated in all patients in which therapy 13 was activated. 14 And finally, the sustained use of the patient activator, I believe is evidence for the 15 16 acceptance shock therapy of in this patient 17 population. With regard to the benefits versus risks 18 of this device, clearly, I think one of the benefits 19 20 of this device is it allows for the early restoration 21 sinus rhythm. pacing therapy of The offers 22 incremental efficacy for the treatment of arrhythmias

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1	with little or no measurable risks.
2	This device also allows for the monitoring
3	of both symptomatic and asymptomatic tachyarrhythmias
4	providing important data for the physician. It also
5	gives patients control of their therapy to allow them
6	to be able to choose and decide when and if they want
7	to receive treatment for their atrial
8	tachyarrhythmias. There's a reduce symptom frequency
9	and severity with the use of this device as well as
10	improved health related quality of life.
11	Finally, I think the last benefit that was
12	clearly seen is that there was protection from
13	ventricular tachyarrhythmias even in a population with
14	no history of sustained ventricular tachycardia or
15	fibrillation.
16	The risks of this study are the morbidity
17	associated with device implantation which is similar
18	to those risks associated with other ventricular
19	defibrillators.
20	In conclusion then the 7250 Jewel® AF "AF
21	Only" defibrillator clinical evaluation shows that the
22	Jewel® AF system is safe and effective in the patient
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population with atrial tachyarrhythmias.

Thank you.

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What I'd like to do now is I'd like to introduce Dave Schwartzman from the University of Pittsburgh. Dr. Schwartzman was the lead investigator and has the largest experience with this device. He was going to present several very short clinical vignettes to highlight the use of this device.

9 DR. SCHWARTZMAN: Good morning. My name is Dave Schwartzman. I direct the Atrial Arrythmia 10 Center at the University of Pittsburgh. 11 I'm an employee of the University of Pittsburgh Health 12 System. My role today has been compensated for both 13 14 honorarium and travel and I am a member of the Atrial 15 Arrhythmia Advisory Board for this company and compensated in that role. And there are portions of 16 my basic and clinical research program with contracts 17 with Medtronic. 18

Appropriately, you've heard today of the interface between the heart and the device in the context of the atrial fibrillation only study. I believe that a full accounting of the aspects of this

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device for evaluation require some sort of elaboration on the interface between the device and the patient or the clinical syndrome.

What I hope to accomplish with these vignettes is to give you that elaboration. In addition, the clinical care of patients with this device is not static. There have been things that we've learned along the way, an evolution of therapies in the context of the device to base strategy, if you will, and I hope to transmit that message as well.

First slide, please. The first patient is 11 12 a 52-year-old and these are rather typical patients that I've chosen for a rather large cohort in our 13 A 52-year-old man with concentric left 14 Center. 15 ventricular hypertrophy and a mildly reduced ejection fraction, paracysmal atrial fibrillation for 8 years 16 in which the atrial arrhythmia attributable symptoms 17 were severe. He is cardiac disabled and was a 18 construction worker. Clinically had failed and/or had 19 been intolerant of multiple drugs including 1A, 1C and 20 Post-implantation of the device he 21 type III drugs. had frequent events initially which necessitated 22

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ancillary propathenode therapy and then a gradual 1 2 tapering of the events and since the 6-month 3 post-implantation point, he has had only the occasional events including patient-activated shocks 4 and all my patients have patient-activated shocks 5 programmed on. No automatic shocks. He remains on 6 7 low dose propathenone, about half of the dose on which he was tried with failure before. And he is working 8 9 full-time.

There are several lessons which I take 10 11 from a patient such as this. The first one is one I'll call delayed gratification. And that is in the 12 13 device-based strategy, what we find more often than not is that control of the atrial arrhythmia takes 14 The science behind that is not 15 time to achieve. 16 exactly clear. For example, a training effect on the atrium may be at play although this study does not 17 lend itself to scientific evaluation of that concept. 18 There's a common need for what I'll call adjuvant 19 20 anti-arrhythmic drug therapy, relief of disability and a number of my patients have returned to work after 21 being disabled based on arrhythmia. 22 And atrial

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arrhythmia events do not disappear. This does not cure. It allows control.

Next slide, please. The second patient is 3 al 64-year-old male with ischemic cardiomyopathy and 4 a severely reduced ejection fraction, 21 percent, 5 pre-implantation of the device. His atrial arrhythmia 6 attributable symptoms are mainly exacerbation of a 7 congestive heart failure syndrome and episodes have 8 9 been going on for a period of time. In the year prior to the implant he had had 18 in-patient hospital days 10 11 attributable directly to his atrial arrhythmia with exacerbation of heart failure. Failure of multiple 12 13 drugs. After implantation, interestingly, we noted that he had frequent events which were pace-terminated 14 15 and in addition was required to activated his device 16 approximately bi-monthly and this pattern continues. 17 He remains on low dose propathenone. He has no in-patient days in the past calendar year and his 18 19 ejection fraction at one year reassessment was 34 20 percent.

We have several lessons to take from this. First of all, serious structural heart disease in our

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experience has not necessarily been a deterrent to 1 2 implanting this device. There are, particularly in 3 the structural heart disease population we're finding 4 frequent pace termination of atrial arrhythmias, whether 5 that relates to more uniform atrial tachyarrhythmias early in the structural heart disease 6 7 group or not remains to be seen. There's a reduction 8 in hospital days and an amelioration of left ventricular dysfunction in this particular case. 9 10 Next, please. The third patient is a 47-year-old man with a structurally normal heart who 11 12 is post A-V node ablation. This was several years back. Referred with a syndrome of frequent paroxysmal 13

fibrillation which has been going on for over a 14 15 decade. His problem was that despite the A-V node ablation with a mode switching rate response of 16 pacemaker, he had persistent symptoms which were 17 severe during his atrial arrhythmia event. The device 18 was demonstrated to be functioning effectively, that 20 is, the pacemaker device with prompt, accurate mode switch. He had had failure and/or intolerance in that context of multiple Type 1 and Type 3 anti-arrhythmic

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drugs including amiodarone and so his system was changed to include the Jewel® AF system.

Post-implantation, we noted that pace termination of his atrial tachyrhythmia general events generally failed and so he was required to activate the device for shock about every three months and he's on no standing anti-arrhythmia drug therapy at this time.

A couple of lessons. Pre-implantation atrial fibrillation syndrome, that is, frequent paroxysmal AF in that case is not necessarily a deterrent to this device-based strategy. And in addition, the duration of the atrial fibrillation syndrome, in this case over a decade, is not necessarily a deterrent to the Jewel®-based strategy.

Next, please. The final patient is a 54-year-old woman, post mitral valve replacement for rheumatic heart disease with a normal left ventricle. Episodic persistent atrial fibrillation for over 8 years. Severe symptoms attributable to the atrial arrhythmia and failure or intolerance of multiple drug including amiodarone. She is now 29 months

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1	post-implantation. Again, frequent events initially
2	noted in this patient which necessitated patient
3	activation which was frequent and for that reason the
4	addition of amiodarone again. Gradual tapering events
5	over time such that we are now anti-arrhythmic drug
6	free. This was the case at one year and since. Event
7	frequency is stable at about every two months and this
8	is really shock. And there has been no change in the
9	event frequency of note for the past 12 to 29 months
10	on the mean.
11	The lessons I take from this case are that
12	the strategy of maintaining sinus rhythm appears to
13	maintain its effectiveness at least thus far, 29
14	months, what I consider a reasonable follow-up
15	duration.
16	I would like to take again, in order to
17	illustrate the interface between the device and the
18	patient and the clinical strategy of atrial rhythm
19	control in this context, I would like to take this
20	opportunity to invite two patients that I have asked
21	to attend this meeting to address specifically their
22	experience with the patient activator and the concept
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1	of commanded shock. I would like to ask my two
2	patients to come up now if they will.
3	MS. JONES: I'm Jane Jones. I'm a retired
4	high school teacher from Pittsburgh, Pennsylvania.
5	Have had the 7250 device for about 13 months now. I
6	have my travel and honorarium has been provided for me
7	for this day.
8	First, I need to say that I don't like to
9	be out of rhythm. I am tired. I am out of breath.
10	I am sweaty. I am clammy. It's not nice. Until I
11	got the defibrillator, my only choice was
12	carioversion. I probably had seven or eight of them
13	in the hospital in the last few years. Now that I
14	have the defibrillator in about a second I can be back
15	in rhythm and on about whatever I have to do that day.
16	Cardioversion in the hospital was not a
17	pleasant day for me. It took the entire day because
18	usually they were working me into their schedule. It
19	also meant that another member of my family had to
20	take off work because you cannot drive home from a
21	cardioversion. So two of us would spend a long day in
22	the hospital, but I would be back in rhythm. Now I

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can do it myself.

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As far as learning how to use my activator, it was not difficult. The day after the device was implanted, I sat in my hospital bed and Dr. Schwartzman put the heart out of rhythm and showed me how to place the activator on top of the defibrillator, push the button, the shock was delivered and he showed me that I was back into It's not very complicated. rhythm.

10 At home, now when I go out of rhythm and choose to put myself back in, I have a very specific 11 I go to my family room and sit in my La-Z Boy 12 plan. 13 chair by myself. I don't like anyone else around. Τn fact, there have been times I've done it when my 14 husband hasn't even been in the house. 15 That's how sure I am that all it's going to do is put me back 16 17 I put my feet up in my La-Z Boy and I into rhythm. tell myself you have to do this. The sooner you do 18 19 this, the sooner you can get on doing whatever you 20 plan to do today. I push the button. There's an 21 immediate beeper system that tells me, a series of 22 beeps, that tells me the signal has been received. In

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the two to five seconds that it takes for the shock to 1 build up, I set the activator back down in my lap, put 2 my arms on the arms of the chair and tell myself to 3 relax. I don't think I do, but I try. As soon as the 4 shock is delivered and what it does to me and I tried 5 to think back to describe it to you. I must close my 6 I never see anything. I know I jump and the 7 eyes. sound I make is something like "uh" and then it's 8 over. I take my pulse immediately and I literally can 9 get out of the chair and go and do whatever I plan to 10 11 do that day. I don't take drugs. I don't take wine to calm me down and I think the main reason is I don't 12 13 want to have to go to bed. I want to be able to get up and go and do whatever I need to do. That's what 14 15 I do. 16 The area that I think maybe I appreciate 17

it as much as not having to go in for cardioversions is vacations. Now that I'm retired, I'm free to go places. My husband and I went to Florida for three weeks last winter. Not having my defibrillator the choices that we would have had to deal with when I went out of rhythm were not really acceptable. Come

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1	home early. Live with it out of rhythm. Neither of
2	those I like. I would have to try a hospital in Tampa
3	to do the cardioversion, but with strange doctors and
4	a strange hospital and it would have taken a day of
5	our vacation. Now I take my activator with me
6	wherever I go. We're going to Scotland next year. I
7	hate the thought of trying to find some place over
8	there to be cardioverted. And I decide when I'm going
9	back into rhythm.
10	It's a good feeling. It's a feeling of
11	power, but it's power over me, over my heart and I can
12	put myself back into rhythm whenever I choose.
13	That's kind of my story. Thanks.
14	MR. CARLSON: Good morning. My name is
15	Donald Carlson and my travel has been paid for. I'm
16	a public school teacher in Waterford, Pennsylvania,
17	just south of Erie. I had my implant last October,
18	October 22nd. My story is about the same as Jane's.
19	When I'm out of rhythm, I feel tired, I'm sweaty.
20	Before I had it implanted when I would come home from
21	school I would just kind of crash and go to sleep.
22	Not have much energy to do anything. Since the

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implant now I can put myself back in rhythm and you 1 feel better almost instantly, about 20 minutes I think 2 3 it takes. 4 I went to school one day and had -- was having an arrhythmia thing. During my prep period I 5 sat in my school chair and shocked myself and by the 6 7 time the prep period was over I was feeling a lot better. So it's something you really can do anywhere. 8 I prefer not to do it at school. I prefer to do it 9 10 when I'm relaxed, either sitting on the couch or lying And it seems to work the best then for me. 11 in bed. 12 But you feel better almost immediately and like Jane 13 said, you don't have to go to a hospital to have it 14 done. 15 So I really appreciate the work that Dr. Schwartzman and Medtronic and how it's affected my 16 17 life and I would like to thank them for that. 18 That's about all I have. 19 DR. STANTON: Thank you. That concludes 20 our presentation. 21 DR. TRACY: Thank you very much. We'll 22 move on at this point to the FDA presentation. NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS

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		MS.	TER	RY:	Good	mo	rning.	му	name	is
Doris	Terry	7.	I'm	the	prima	ry	review	for	P9800	050
Supple	ment	1.								
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Incorporated, is seeking approval for the Medtronic Model 7250 Jewel® AF implantable cardioverter defibrillator in the "AF Only" population.

Acknowledgements to the members of the FD Review Team who were instrumental in completing the review of the PMA application.

12 The Model 7250 Jewel® AF is an implantable 13 cardioverter defibrillator that detects and treats 14 episodes of atrial and ventricular tachyarrhythmias 15 bradycardia delivering defibrillation. and by 16 cardioversion, antitachycardia pacing, albradycardia 17 pacing. Atrial arrhythmias are detected by the Model 18 7250 either as atrial fibrillation, atrial tachycardia 19 by monitoring the cycle lengths and regularity of the atrial intervals. We should note that this is a first 20 of its kind ICD intended for use in the "AF Only" 21 population. 22

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1	The system consists of the commercially
2	available pulse generator model 7250, approved under
3	P980050, the Model 9465 Patient Assistant, the Model
4	6937 ACSSEC lead and other commercially available
5	leads and accessories.
6	The proposed indications for use of the
7	Model 7250 Jewel® AF only study are as follows: The
8	Jewel® AF implantable cardioverter defibrillator is
9	intended to provide pacing, cardioversion and
10	defibrillation for treatment of patients with
11	symptomatic, drug refractory, atrial tachyrhythmias
12	and/or life threatening ventricular tachyarrhythmias.
13	As mentioned in the Medtronic
14	representation the study design involved a
15	multi-center perspective IDE study that evaluated
16	safety and effectiveness of the Jewel® AF. Also,
17	there was a randomized crossover study for evaluating
18	prevention therapies. The primary and second
19	objectives were called out in the Medtronic
20	presentation.
21	The PMA population consisted of 146
22	patients enrolled. One hundred forty-four actually
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received the device. The mean follow up was 12.7 plus 1 2 or minus 6.1 months. The primary indication was ATF only in 97 percent. The New York Heart Association 3 4 Class was 53.4 percent Class I; 34.2 percent, Class 5 II. The mean ejection fraction was 51.1 percent. For data analysis, the time to first 6 7 system-related complications was analyzed using the 8 Cox Regression Model. The study requirement is meet 9 when the analyzed data is less than or equal to 3. The relative risk of system in procedural related 10 complications for the Jewel® AF versus the control was 11 The complication-free survival results were 12 1.31. compared to the model 7219D Jewel®. 13 The episode treatment effectiveness, the 14 GEE equation was used to adjust more multiple 15 episodes. 16 The adverse events were categorized as 17 occurring implant, system-related 18 those at requiring invasive intervention, complications 19 observations, events without invasive intervention and 20 events that were not device related. 21 A summary of the adverse events: 11 22 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVENUE, N.W.

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1 events occurred in 11 patients at implant. There were 2 26 system-related complications in 23 patients. Two hundred twenty-one system related observations were 3 reported in 97 patients and 322 nonsystem adverse 4 events such as chest pain, fatigue, congestive heart 5 6 failure were report in 95 patients. 7 Kaplan-Meier estimates compare the complication-free survival of the Jewel® AF 8 Only population and control at 3 and 6 months. 9 The 10 estimates and percent confidence intervals are shown. There's a Panel question regarding the survival rates 11 12 of the Jewel® AF Only population. 13 Eight deaths occurred in the PMA 14 population. Seven nonsudden cardiac and one death categorized as unknown. Kaplan-Meier estimates also 15 compared survival from all cause mortality of the 16 17 Jewel® AF Only in control at 3 and 6 months. The 18 estimates in 95 percent confidence intervals are also 19 shown here.

Episode treatment effectiveness for atrial tachyarrhythmias, the requirement was that for lower 95 percent competence bound is greater than 75

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For atrial tachy therapies treated with 1 percent. atrial shock, 107 patients had 1200 atrial episodes 2 3 that were treated with atrial shock. Ninety-one 4 percent were terminated. The adjusted atrial 5 therapy's effectiveness was 85.9 percent with a lower 6 81.7 percent confidence bound. 7 Episode treatment effectiveness was reported for ATF episodes treated with ATP. 8 Success 9 reported at 38.6 percent; 32.1 percent adjusted. 10 For AF episodes treated with higher 11 frequency bursts, success was 18.2 percent and for AT 12 episodes treated with high frequency bursts there was a success rate of 11.7 percent. The success rate are 13 noted also in a Panel question. 14 The positive predictive value for the 15 16 atrial detection algorithm was reported as 98.6 percent. 17 The effective prevention therapies on the 18 tachyarrhythmias with 19 frequency of atrial the randomized crossover study that included 75 patients 20 reported no statistically significant difference in 21 22 frequency reduction. NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS

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1	The Model 9464 patient activator is
2	hand-held. It's a hand-held device which can be
3	placed over the Model 7250 to trigger delivery of an
4	atrial shock. This is the first of its kind of device
5	which can be used by the patient to initiate atrial
6	shocks to treat their atrial arrhythmias.
7	The clinical experience, of the Model 9464
8	Patient Activator is being used to support approval of
9	the downsized model 9465 Patient Assistant, 71 percent
10	of the patients were programmed for self-activated
11	shocks. The effectiveness for the self-activated
12	shocks was 89.1 percent lower bound of 84.6 percent.
13	Twenty-seven adverse events with use of
14	the Patient Activator in 71 patients were reported.
15	Thirteen of the events in 12 patients were considered
16	as device-related. Of these were 9 cases where the
17	patient was unable to initiate a shock and 4 cases of
18	failure of the activator to deliver warning tones of
19	pending shocks. Fourteen events occurred with use of
20	the activator and were not considered devise-related.
21	Most of the events involved cases where there was an
22	activated shock that failed to defibrillate due to

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insufficient programmed energy.

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2 The 6937 CSSVC Lead, 114 patients were 3 implanted with this lead. The mean atrial DFT was 6.2 plus or minus 6.6 joules. 4 The lead parameters 5 remained stable through 3 months. 6 Regarding the lead-related adverse events for the 6937A, there were no events at implant; 3 7 8 complications, lead dislodgement in 3 patients and one 9 lead-related observation in 1 patient. 10 The Panel questions. In evaluating device 11 safety, Medtronic reported 3 and 6 month complication pre-survival results were lower when compared to 12 adverse event results from previous ICD studies. You 13 14 can see this in Table 1 of the Panel questions. In addition, four patients had a stroke 15 16 during the course of the study. The risk of stroke, possibly as a result of frequent cardioversions raises 17 an important issue when evaluating safety of atrial 18 19 shock therapy. Please discuss the clinical significance 20 of the complication-free survival results and the 21 22 occurrence of stroke in assessing the safety of the NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVENUE, N.W.

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Jewel® AF for the new indication of treating patients with atrial tachyarrhythmias.

3 In their investigational Number two. plan, Medtronic prospectively specified the Model 4 7219D as the safety control. 5 It appears from the demographic co-morbidity data that the Model 7219D 6 7 population was sicker than the Jewel® AF only 8 To address this Medtronic performed a population. risk factor analysis intended to take into account 9 10 baseline differences in cardia health. Given the choice of controls, do the clinical results of the 11 Jewel® AF only study demonstrate device safety for the 12 13 intended patient population?

Number three. As reported in the clinical study, Medtronic met their specified effectiveness hypothesis for atrial shock. Additional effectiveness results were also reported as in Table 2 of the Panel Questions.

The study also examined the effectiveness of atrial prevention therapies on frequency of atrial tachyarrhythmias using a crossover study. Medtronic reported that the reduction in AT/AF frequency when

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1	atrial prevention therapies were programmed ON versus
2	OFF was not statistically significantly different from
3	zero. Based on these effectiveness results, please
4	discuss whether you believe the potential benefits of
5	atrial tachyrhythmia termination and prevention
6	therapies outweigh the risks of implanting the Jewel®
7	AF in the intended patient population.
8	Number four. The clinical experience from
9	the Model 9641 Patient Activator is being used to
10	support approval of the downsized Model 9465 Patient
11	Assistant. Given the experience, do you have comments
12	or concerns regarding the clinical use and labeling of
13	the Model 9465?
14	Number five. Given the proposed new
15	Indications for Use for the Jewel® AF and the
16	likelihood that the patients will be healthier than
17	the ICD patient population, please discuss whether you
18	believe that the potential benefits of implanting the
19	Jewel® AF in patients with atrial tachyarrhythmias
20	outweigh the possible risk associated with the
21	implantation and therapies of the device.
22	Number six. Of the two enrolled patients

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1 who did not receive the device, one patient had no atrial capture during the implant procedure. Also of 2 the 10 reported device explanations, 6 of the reported 3 reasons suggest that the device therapy in these 4 patients was either ineffective or poorly tolerated. 5 Medtronic reported that 13 patients had an ablation 6 7 procedure, alternative therapy, an after being 8 implanted with the Jewel® AF. Please comment on whether you believe the Jewel® AF provides adequate AF 9 10 prevention and/or treatment therapy for this patient 11 population, and whether you believe that the therapies, particularly atrial shock therapy, may be 12 poorly tolerated in some patients. 13 Please provide your clinical impression of these potential 14 intention-to-treat failures and discuss how this 15 16 clinical information should be presented in the Jewel® AF's Instructions for Use labeling. 17

18 Number seven. The Jewel® AF System is 19 intended to provide pacing, cardioversion and 20 defibrillation for treatment of patients with 21 symptomatic, drug-refractory atrial tachyarrhythmias and/or life threatening ventricular tachyarrhythmias. 22

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Please provide your clinical impression of Medtronic's 1 proposed Indications for Usage and comment on whether 2 they are clinically appropriate for the Jewel® AF 3 indicated population. 4 5 DR. TRACY: Thank you. We'll move on to the Open Committee Discussion and the lead reviewer 6 for this product is Tony Simmons. 7 8 MS. MOYNAHAN: Members of the Sponsor can 9 approach the table if they'd like. 10 DR. SIMMONS: Okay. Tony Simmons. Ι guess I have difficulty beating around the bush, so 11 let me go right straight to it and say I have a lot of 12 13 problems with this particular proposal and I hope you can convince me otherwise. 14 15 Let's start off on page 1-35 under the FDA summaries, okay? This is a table of adverse events 16 and complications. 17 18 DR. STANTON: Which section is this in? 19 DR. This is under the FDA SIMMONS: 20 summaries. Section 4. Page 1-35. 21 Atrial fibrillation is a common disease. We see -- I get more atrial fib consults than I ever 22 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS

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-	thought I would even goo in my lifetime and
1	thought I would ever see in my lifetime. And
2	certainly, it's a very complicated disease with lots
3	of causes and lots of potential therapies are being
4	proposed right now. In fact, there's a multi-center
5	study trying to decide it's even safe to treat atrial
6	fibrillation and maybe we just should be
7	anticoagulating these patients and leaving them alone.
8	So I think we have to at least get on the
9	same framework, the same common ground that this is a
10	nonfatal disease, with serious quality of life issues,
11	serious aggravations to patients, but it is not a
12	life-threatening disease. Can we start there?
13	DR. STANTON: I'd agree that it's
14	immediately not life threatening. I think there are
15	data to show that people with atrial fibrillation are
16	at an increased risk of mortality, but I'll concede
17	the point for discussion.
18	DR. SIMMONS: Okay. You know, if we look
19	at this table here and we just start off with a lot
20	of these complications and serious adverse events are
21	just things that I'd expect to see, things like
22	shoulder pain and patients have congestive failure,

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they get more congestive failure, early recurrence of 1 2 atrial fibrillation. I'm going to throw all those 3 things out. Let's just look at the ones that I 4 consider serious complications like two patients with no device implanted, okay? So you took two patients 5 to the operating room and because of the substrate, 6 7 whatever, you couldn't implant the device. That's a complication. Inappropriate detection, oversensing, 8 lead dislodgements, 2 9 11 infections, 1 device 10 explanted because of anxiety, lead failures, patients unable to tolerate therapy, serious undersensing. 11 Ι 12 mean if we just add up those and throw out all the 13 other ones, pacemaker syndrome, things like that. We 14 end up with about 25 significant complications or as serious adverse events which adds up to about 13 15 16 percent. So you're talking about taking patients who don't have a life threatening disease and you're 17 subjecting them to multiple operations and you're 18 19 ending up with a serious complication rate of 20 approaching 15 percent. I mean is this realistic? David, is this realistic? I mean FDA is 21 22 going to ask me this at the end of this time. They're

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going to ask me is this realistic. I mean, really, is this realistic? A 15 percent serious complication rate for a nonfatal disease?

4 DR. SCHWARTZMAN: You say nonfatal as if it's the only arbiter of care in these patients. 5 These patients are highly selected. I think it's fair 6 7 to say the burden of this entity directly attributable to atrial fibrillation, take away all of the bunting, 8 this is atrial fibrillation attributable symptoms is 9 10 tremendous. I'm not saying that this is applicable to the broad swath of atrial fibrillation, I agree with 11 12 you. It's a major public health problem, but in terms 13 of the patient perceived benefit of something like this, this is small across the board. 14 But for a 15 select group of patients, it is not small and I would 16 submit that the benefit is real and worthwhile in the 17 the complication rate. face of Some of the complications that you mentioned I would not describe 18 19 as therapy-limiting. They're realistic. They're IDC like, but again my orientation has been and continues 20 21 to be that this is a reasonable and effective strategy 22 in the right subgroup of patients with atrial

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fibrillation.

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2	DR. STANTON: I think a real important
3	point is that this device therapy is aimed at a very
4	specific limited group of patients with atrial
5	fibrillation and we've been very careful to specify
6	that in our study inclusion criteria and in the
7	labeling that we think is appropriate for this device.
8	In no way are we trying to say this device and device
9	therapy is appropriate for everybody with atrial
10	fibrillation.
11	What I believe is that this offers
12	physicians another tool in their armamentarium for
13	treating these highly symptomatic patients with
14	recurrent atrial fibrillation and the complications
15	that you point out here, we acknowledge, and they are
16	complications of device-based therapy. And in fact,
17	if we looked at published literature on a blatant pace
18	therapy has similar types of problems with lead
19	dislodgement, infection, etcetera.
20	Michael?
21	DR. GOLD: I think to try to put into
22	perspective at least for me this device is part of a
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1 treatment strategy for maintaining sinus rhythm in drug refractory, highly symptomatic patients. If you 2 take everything you point out about failures, those 3 are failures for the treatment strategy, if you take 4 5 the patients who you can't implant a device in, if you take the patients who can't tolerate the therapy, if 6 7 you take the patients who you give up and do A-V junction ablations, if you take the patients who 8 explanted devices for infections, if you take all of 9 them and say we failed on those, you're still talking 10 about a success rate in this population of being able 11 to maintain sinus rhythm on the order of close to 90 12 13 percent at one year. We actually have a slide that we can put up where we looked at that data because we 14 15 were very concerned about that, but I think if you, 16 from a clinical perspective when patients come to me with recurrent drug refractory atrial fibrillation, 17 18 the chance of me with yet another drug or yet another 19 treatment strategy being able to keep them in sinus rhythm is extremely low. I have never -- know of any 20 of other therapies that approach this sort of success 21 22 rate. So is there a price to pay in this high risk

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population? Absolutely. 1 But I think rather than looking at the complication rate, when I look at the 2 success rate, I think we actually had a remarkably 3 high success of being able to maintain a strategy of 4 sinus rhythm in a group of patients who 5 most physicians and most of us would have thought the horse 6 was out of the barn and we'd already lost the battle 7 8 of trying to control their atrial fibrillation. This 9 is the curve here showing at 2 years. We're at 89.9 percent of therapy, device therapy survival calling a 10 11 failure anyone who had their device either turned off, 12 if atrial therapies were turned off, or their device 13 explanted, removed or any A-V junction ablation. If we take all of them lumped together, we still have 81 14 percent of patients at two years receiving therapy 15 which I think really is a testimony to how effective 16 17 this therapy approach is in this group of patients. 18 DR. SIMMONS: I'm not sure I buy that. If 19 you did nothing with this patient population and you 20 did enough EKGs on most of them at two years, you'd

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forth between sinus rhythm and atrial fibrillation,

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find out that a lot of them are still going back and

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wouldn't you?

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I don't think so. 2 DR. GOLD: If 65 3 percent of these patients were in atrial fibrillation, I assume that in that group who are already drug 4 5 refractory, at two years, certainly placebo-controlled 6 studies have suggested in the absence of anti-7 arrhythmic drugs or failed anti-arrhythmic drugs, I 8 think the proportion of those patients who would be in sinus rhythm at two years would be a small minority of 9 10 patients. I'm not saying it would be zero, but it 11 certainly would not approach 81 percent. 12 DR. SIMMONS: Well, that's if you gave up

13 trying to treat them and bringing them in to cardiovert them and I guess if you gave up all therapy 14 and just didn't do any type of treatment for that 15 16 group of patients, I'm still not sure it would be a minority. I mean the placebo-controlled trials I 17 remember would suggest that probably 50 or 60 percent 18 19 of them are still going to remain going back and forth 20 between sinus rhythm and the paroxysmal group.

21 DR. STANTON: Which is only a third of 22 this patient population. Two-thirds were persistent.

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1	DR. GOLD: Whether the total number would
2	be 30 percent, 15 percent, 40 percent, I would be
3	I don't think the literature would support that a
4	majority of patients would be in sinus rhythm in who
5	years at this population. And 81 percent at two
6	years, I found actually very reassuring.
7	DR. SIMMONS: You know, I'm not denying
8	that I guess that the device has effectiveness. I'm
9	just not completely convinced that this is the device,
10	that this is that the price that you're willing to
11	pay, I guess, at this point in time I'm not completely
12	convinced that the price for the device is worth the
13	effectiveness. Do you understand what I'm saying?
14	These are significant operations.
15	Now you guys are doing them, so you're
16	taking care of the patients, so you are somewhat
17	emotionally involved in taking care of the patients,
18	but when you stand back and look and see how many
19	reoperations these patients had and how many of them
20	ended up with their devices explanted and how many of
21	them ended up with A-V node ablations and I mean it's
22	a significant number.
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1	DR. STANTON: I think it's also you can
2	look at the glass as being partially empty or mostly
3	full. These, again, I want to come back and say this
4	is a very select patient population. This isn't all
5	comers with a-fib that you see in an a-fib clinic.
6	These are highly symptomatic people who have failed on
7	an average of three drugs prior to coming to this
8	point and these patients, I think now can and should
9	be offered an alternative that for many of these
10	patients, in fact, the majority of these patients
11	works very well with known complications that are in
12	the same range as device-based therapy. I think when
13	clinicians offer any therapy, be it surgical, drug,
14	ablation, you have to go through a list of what the
15	complications are. With anti-arrhythmic drugs, you
16	have to talk about pro-arrhythmia, the chance that a
17	person is going to die from the treatment you're
18	initiating for a nonfatal arrhythmia, as you point
19	out. Nobody died because of device therapy in this
20	trial. With the surgical maze procedure there's
21	certainly a lot of morbidity associated with that.
22	For appropriate patients, it's an appropriate thing to

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offer.

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2 DR. GOLD: And I may again to reemphasize, 3 tomorrow I'm going to be seeing patients as well and 4 just as you are, I can guarantee you that in my clinic tomorrow I'm going to be seeing patients with atrial 5 6 fibrillation coming there. When a patient shows up in my office with atrial fibrillation do I recommend an 7 8 atrial fibrillator to them, to most of them? 9 Certainly not. We've estimated about 5 percent of the 10 population of atrial fibrillation patients, those who remain highly symptomatic, who have failed drugs, who 11 12 are very motivated as we heard from the couple of patients we heard today, patients who are really 13 debilitated symptomatically from their arrhythmias. 14 For those patients to accept the chance that there's 15 16 a 10 to 20 percent chance over the course of two years 17 that this therapy may fail, to give them an 80 percent chance of being in sinus rhythm and in fact, 94 18 percent of this population was in sinus rhythm at one 19 20 year. That group of patients, I think, not only would benefit, but would jump at the opportunity for that. 21 22 But it's a very select group of highly motivated,

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highly symptomatic patients in whom this invasive 1 2 therapy is a useful therapy with very low, at least no mortality measured, A-V node ablation which we do 3 commonly in this group, clearly has some measurable 4 mortality and sudden death associated with the 5 anti-arrhythmic drug therapy which I give to these 6 patients has some measurable pro-arrhythmia mortality 7 8 associated with it. So it's a cost to all of our 9 therapies and I think in a selected group of motivated, highly symptomatic patients, they are more 10 than willing and they benefit from the therapy. 11 12 DR. SIMMONS: I guess, you know, I can understand what you're saying and I appreciate what 13 you're saying. When you, however, release this device 14

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15 to say it is now an atrial fibrillator and it's being 16 released to every physician who can get a license to 17 implant, I'm not so sure that the device will necessarily be applied and I don't know of any way to 18 19 get the device to be applied to that select, less than 20 5 percent of patients who are going to be -- you know, 21 really beneficent, because I think you're right. Ι 22 appreciate what you're saying, that there are

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motivated people with high pain tolerances who can 1 2 learn to live with this thing and make it work and in that very small group of patients, yeah, I could see 3 4 this could be a very valuable thing. But as a therapy for atrial fibrillation and have an indication this 5 6 device can be impacted for atrial fibrillation, I 7 don't know. 8 DR. SCHWARTZMAN: Let me try to address that, Tony, because I think that's my concern as well, 9 10 based on now interfacing with communities surrounding 11 my Center. I think that, first of all, this is not a 12 -- I'm not selecting patients here for high pain 13 14 tolerance, if you will. I think patients look at it 15 as risk reward and again, at least in my cohort we have a large representation of age, group and gender 16 17 co-morbidity, for example. We've had no explanations for intolerance. People use shocks variably and their 18 19 thinking on it evolves with the study, but shock use 20 is the rule rather than the exception. 21 In terms of how this will be applied in 22 the community, it is my feeling that the patients will NEAL R. GROSS

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drive the utilization of this device and by that I 1 2 mean if physicians begin implanting this in patients in whom the risk reward is not there, particularly 3 4 those who get shocks that are automatic, for example, that will not be tolerated and in no uncertain terms 5 that will return to the physician and the physician 6 7 will stop prescribing that therapy. So I personally believe that this will be relegated to the shelf of 8 electrophysiologists who deal with referral type 9 10 atrial tachyarrhythmias who have considered all of the 11 therapeutic options and who have taken the time to 12 establish that the symptoms are attributed to atrial 13 arrhythmia and severe enough to warrant considering 14 it. I believe that's the way it will evolve. I don't 15 think it's going to go out there and these things are 16 going to go in willy-nilly and let the chips fall 17 where they may. I really think that it will constrain 18 itself because of the risk reward issue.

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DR. SIMMONS: Let's go on to another topic. On that same page under Table II, Lead Dislodgements, if we look at the lead dislodgements for this study, overall you had 12 out of 254 leads

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1	dislodged which is 4.7 percent which is high. If we
2	look at just the atrial leads and the CS leads, the
3	dislodgement was 11 out of 218 which is around 5
4	percent which is pretty high. And then if we give you
5	the benefit of the doubt and throw out the 6937 data
6	and just look at the 6937A data for the atrial and CS
7	lead dislodgement, you're talking about 10 out of 200
8	which is about a 4.7 percent atrial or CS lead
9	dislodgement. So I actually went to the library,
10	actually I sent the EP Fellow to the library
11	(Laughter.)
12	and had them look up lead dislodgements
13	over the last few years, atrial lead dislodgements and
14	certainly Parsonette's database, the European database
15	and these actually include surgeon's putting in atrial
16	leads, was only around 2 percent. I expected to get
17	a comments from the surgeons when I made that comment,
18	but I didn't get it.
19	(Laughter.)
20	It was a joke, it was a joke. It was only
21	about 2 percent. So you're talking a significantly
22	high lead dislodgement rate than is in the reported
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1 literature.

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2	When we met for the 7250, we were
3	concerned about the atrial lead dislodgements and
4	actually proposed that there should be a
5	post-marketing surveillance for this led. Do you have
6	any data from that, anything you want to comment about
7	that?
8	DR. STANTON: Yes. The 6943 lead has just
9	begun a post-market study as FDA asked for. We don't
10	have any data from it yet.
11	The lead dislodgement rate is 6.9 percent
12	which is about the same as it was in the VT/AT study
13	that you're referring to.
14	DR. SIMMONS: Don't you think that's
15	that's very high.
16	DR. STANTON: Yes. It's certainly higher
17	than the 2 to 3 percent that's reported in the
18	literature.
19	DR. SIMMONS: Do you guys want to comment?
20	DR. GOLD: I may comment. I absolutely
21	agree that it's high, a very high rate, not a rate
22	that we normally accept or want to see. Most of those
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lead dislodgements were due to putting defibrillation 1 coils in the atrium or in the coronary sinus. That is 2 not a requirement for the implantation of the system. 3 I think it's important to point out to implanters and 4 investigators that there's different ways to skin a 5 6 cat. 7 David and I differ, I think, a little bit 8 in terms of our implantation approach, but I'm of the 9 approach that the simpler, the better and the -- I don't use this lead at all. The lead system that I 10 11 use is the simplest, easiest to implant lead system to 12 try to minimize my complications. And the lead 13 complications with standard leads and standard positions are no different with this system than with 14 15 other type leads. So one has the option of an adequate well functioning system with different lead 16 17 complications with lower complications --18 DR. SIMMONS: So what system do you use? DR. GOLD: I use the standard dual coil 19 20 defibrillation lead and a standard atrial pacing lead. 21 I don't use a coronary sinus lead. I don't use an 22 atrial coil. I use the same lead system that I used

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2	DR. SIMMONS: I do think that's
3	interesting because that was going to be one of my
4	later points is that if we look at the defibrillation
5	thresholds as reported with the coronary sinus lead in
6	the coronary sinus versus the atrial defibrillation
7	thresholds without that lead, they are .2 joules
8	difference and you're recommending programming this
9	thing at twice the atrial DFT which is going to be
10	around 12 to 15 joules as a first shock for the
11	average patient, so why are we even bothering with
12	this lead? Why are we even asking for approval for
13	this lead?
14	DR. SCHWARTZMAN: Because there are
15	individuals who require that vector, presumably for
16	effective atrial defibrillation.
17	DR. SIMMONS: Maybe, maybe huh.
18	DR. STANTON: Tony, it wasn't randomized
19	for looking at does the coronary sinus lead change
20	defibrillation thresholds. This was at the discretion
21	of physicians and in some cases they may have added it
22	to try and lower the defibrillation threshold, so

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those are the numbers of the DFTs, but I don't know 1 2 what they mean in comparison. 3 DR. SIMMONS: Okay. DR. GOLD: But I think simple lead systems 4 have low lead dislodgement, low lead complication 5 rates. Investigators and implanters need to know that 6 more complicated lead systems and more coils in the 7 8 heart increase complication rates and lead 9 dislodgement rates and it becomes, I think, if 10 approved their choice of is the benefit worth the risk 11 in that situation. 12 DR. SIMMONS: Well, maybe there should be 13 something in the packaging, an insert or something to 14 suggest the fact of just exactly what you said. If we do decide to approve the lead, based upon its high 15 16 dislodgement rate is still a question, but if we do decide to approve the lead, whether or not it 17 shouldn't come with a warning that there is a high 18 dislodgement rate and there is no proof that adding 19 20 that lead right now actually does much for you. 21 DR. STANTON: Tony, I'm sorry, I missed 22 some of that. Were you talking now abut the 6937A or

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74 1 the --2 DR. SIMMONS: Yes. 3 DR. STANTON: The lead dislodgement rate was 2.5 percent for the 6937A which is the coronary 4 sinus lead and that's actually acceptable. 5 DR. SIMMONS: Right. 6 7 DR. STANTON: Right, and with the 6943, were you raising a question --8 No, whether or not just --9 DR. SIMMONS: 10 you know, let me back up for just a second. Out of your 146 patients, only 86 had atrial defibrillation 11 thresholds done, is that what I saw? I mean why so 12 13 low? I mean that's terrible. That's for any clinical Those are significant protocol violations, 14 study. Sixty percent of your patients went 15 aren't they? 16 through the protocol the right way? MR. BROWN: My name is Scott Brown. 17 I am a statistician with Medtronic. All of the patients 18 with the exception of one did go through an atrial 19 20 defibrillation threshold testing process. For the purpose of analyzing DFTs, we only reported those 21 numbers if they followed precisely the two-step 22

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protocol which included the precise use of increased 1 2 thresholds as they went along. So there were a vast 3 majority of patients who did have testing. Not all the data was analyzed as such. 4 5 DR. SIMMONS: Okay. Well, that makes me feel somewhat better. 6 What we were talking about is you have no 7 8 proof that adding that coronary sinus lead is really 9 going to improve your defibrillation thresholds 10 significantly, then maybe if we do approve it, at the 11 very least that lead should come with some warning 12 that's there no evidence that it actually does 13 anything as far as improving thresholds. Do you want 14 to comment on that? Well, I think the coronary 15 DR. GOLD: sinus lead was not the culprit for the increased lead 16 dislodgements. 17 DR. SIMMONS: No, right, but still if 18 19 you're going to program something to 15 joules and you can put in a coronary sinus lead and drop the joules 20 21 down to 10, the patient is not going to perceive any 22 difference.

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1	DR. STANTON: Yeah, I would say we
2	certainly are not making any claim that the 6937A does
3	anything different to atrial defibrillation thresholds
4	and if you want that in the labeling we can put it in.
5	We did not test that as part of the study protocol.
6	DR. SIMMONS: Okay. I must say I'm
7	disappointed there's no data from that post-marketing
8	surveillance. When did you go on the market with
9	this?
10	DR. STANTON: The device was approved in
11	June of 2000 and we did not start to release it until
12	late August, so with rolling out the investigational
13	protocols and getting IRB approval it's just starting
14	for that study.
15	DR. SIMMONS: Okay. A few other things
16	and then I'll let it go for other people.
17	One thing I wasn't clear about is I
18	noticed in the manual a couple of times it says a
19	rapid ventricular rate precludes therapy. If the
20	patient has a rapid ventricular rate and it's atrial
21	fib. or atrial flutter, then giving them therapy
22	should be beneficial. If it's ventricular

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arrhythmias, then giving them therapy at the very 1 least shouldn't hurt them. Why does rapid ventricular 2 3 rates preclude therapy? DR. STANTON: Are you talking about the --4 there is a safety features that prevents delivery of 5 an atrial shock during rapid ventricular rates and the 6 reason for that is so that you don't have the 7 possibility of when you're delivering relatively low 8 9 energies as you might during atrial defibrillation, possibly hitting during repolarization 10 of the 11 ventricle. 12 DR. SIMMONS: So what are you defining as a rapid ventricular rate that you can't -- is this 13 like a programming lockout? 14 15 DR. STANTON: Yes. It's programmable and the minimum value is 400 milliseconds. So nothing --16 it won't deliver if the RR interval is shorter than 17 18 400 milliseconds. It's a safety feature. 19 DR. SIMMONS: One hundred fifty beats a 20 minute. All right. Do you guys agree with that? Does that make sense to you? 21 22 DR. GOLD: I do. I think obviously safety NEAL R. GROSS

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is the number one concern and since we all induce 1 2 ventricular fibrillation routinely by shocking low energy on T waves, the concern was that if patients 3 with a very rapid response and it's not a regular 150, 4 they're in atrial fibrillation, that with a long short 5 coupling interval that a shock synchronized to an R 6 wave could still be a vulnerable period from the 7 preceding beat somewhere else in the heart and there's 8 9 been concern the in literature about inducing ventricular tachyarrhythmias, ventricular fibrillation 10 11 with such shocks. So it seems to be, I think, a reasonable safety approach and the data show there 12 13 were no pro-arrhythmia events with shocks, so clearly the way it's now designed it's very safe 14 for 15 delivering shocks.

DR. SIMMONS: It just seems like a couple of the patients that you just brought up here on no antiarrhythmic drugs could very easily have an RR of 155 beats a minute and then they wouldn't be able to get their therapy.

DR. SCHWARTZMAN: As a matter of strategy, it has happened. It happens occasionally. But in

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terms of the way it generally plays out, depending on 1 what the patient is doing in part, obviously, if 2 3 they're more active or upright. And so the device, the activator will tell them if the device cannot 4 5 delivery therapy. Generally, that's because of the 6 rapid rate and what will happen is they lie down and 7 relax for a few minute or take a single dose of a beta blocker, for example, and those patients in which the 8 problem has been a persistent problem, they get put on 9 standing drugs, such as a calcium channel blocker or 10 11 a beta blocker. So as a matter of incidence that has 12 happened, certainly a minority of patients and in 13 terms of responding to it, it's not a big deal. 14 DR. STANTON: And, Tony, just to clarify, it's not an average rate of 150, so 400 milliseconds, 15 16 it's any interval short than. So if you have one interval that's longer than 400 milliseconds, that's 17 the programmed lockout, then it would be able to 18

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DR. SIMMONS: Just one or two other little

deliver. But as David points out, there are going to

be cases where people are going to be going rapidly

and consistently be over 150.

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quick things. Under your indications section and we 1 2 can talk about this later, but certain atrial tachyarrhythmias, I mean I don't think I could ever 3 vote for a device that's going to be labeled as 4 therapy for atrial tachyarrhythmias. 5 I mean this is an atrial fibrillation device. I can't even imagine 6 wanting it to say this is a primary therapy for atrial 7 8 flutter and certainly not for regular superventricular 9 tachyarrhythmias. So just as а matter of 10 housekeeping, certainly we are talking about an atrial fibrillation device, not an atrial flutter device. 11 12 You only have 3 percent of your patients so I don't think you can make very many claims for -- this is 13 therapy for atrial tachyarrhythmias other than atrial 14 15 flutter and atrial fibrillation. Do you want to 16 comment on that, David?

DR. SCHWARTZMAN: I would like to, mainly as a function. I agree with you in terms of uniform rhythms whether pharmacologic or catheter ablationbased solutions, but what I would submit is that -and based on what we're learning from these devices is that these syndromes are not static or describable as

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a single entity. For example, patients that you would 1 2 swear were in persistent atrial fibrillation will have periods of flutter or atrial tachyrhythmia that are 3 4 minimal to base termination. On the contrary, patients with primarily uniform syndromes like flutter 5 will be in fibrillation. Part of the problem is our 6 7 inability define from to the surface of an electrocardiogram what is going on and part of the 8 9 problem is that these are hybrid syndromes and that is 10 turning out to be the rule rather than the exception. 11 A perfect example is atrial flutter which, in my opinion, is rarely a solitary rhythm. It is generally 12 13 fibrillation that happens to have a combination of electrophysiologic features and probably anatomical 14 15 features in the right atrium that support a macro 16 re-entrant rhythmia such when you remove that possibility sooner or later you're left with an atrial 17 fibrillation syndrome. 18

So I think it's not that simple. I would agree with you wholeheartedly that if you can define a uniform rhythm, then this device is certainly not the way to go, but I would also submit to you and

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again with a large experience in an atrial arrhythmia center it is very rare to see patients with pure syndromes relative to those with impure syndromes.

DR. SIMMONS: Yes. And I have no problem with patients having atrial fibrillation and atrial flutter being candidates. Clearly, you're right, atrial pacing and even the high burst may turn out to be very effective therapies for those arrhythmias, but to put this device in as a therapy for atrial flutter which now has probably a 90 plus percent cure rate with ablated therapies and other therapies, I don't think you've prove that that kind of risk benefit ratio exists.

14 DR. GOLD: Yes. I think we agree or at 15 least I agree. The distinction is probably more for the treatment of the arrhythmias. When we separate 16 the arrhythmias as the device does into regular atrial 17 18 tachyrhythmias, atrial tachycardias from atrial 19 fibrillation, there's obviously a very different success rate in terms of case termination and other 20 21 treatments of those arrhythmias. So they're 22 concomitant arrhythmias with the atrial fibrillation

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1	that the treatment is more effective and we have
2	effective ways of being able to deal with the, at
3	least periods of more organized rhythms in these
4	populations of the patients, but I don't think there
5	are many people who would suggest that for a patient
6	with paroxysmal SVT or atrial flutter, we're going to
7	start implanting defibrillators.
8	DR. SIMMONS: One other quick question and
9	then I'll quit. Under your look at page 5 in the
10	package insert. It says whenever the patient has an
11	A-V node ablation, antitachycardia pacing and
12	frequency burst pacing therapy should be disabled.
13	Why is that?
14	DR. STANTON: I'm sorry, which was it
15	again?
16	DR. SIMMONS: It's at page 5 under the
17	package insert. A-V node ablations, patients
18	receiving A-V nodal ablation after implant should have
19	atrial anti-tachycardia pacing and atrial high
20	frequency burst therapies disabled.
21	DR. CONLEY: My name Dennis Conley from
22	Medtronic. The reason we put that in there is because
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during ATP pacing in the atrium we did not have backup 1 ventricular pacing in this device. So we thought once 2 this is out in the marketplace, that is the most 3 conservative warning that we could have in that 4 Does that make sense? 5 device. 6 DR. SIMMONS: Yes. I guess I didn't 7 appreciate that. So you have no backup ventricular packing when you're doing anti-tachycardia pacing? 8 9 DR. CONLEY: In the atrium, that's correct, in this particular device. 10 11 However, you could speak to your experience maybe with A-V nodal ablation? 12 13 DR. SIMMONS: Maybe I'll have about half 14 a dozen patients with nodes either prior to or 15 subsequent to the device implant and that's obviously 16 a problem. 17 What we've done is we've programmed the antitachycardia pacing durations to be a second or 18 And none of the patients are perceived that 19 less. brief period of withdrawal of ventricular support 20 21 pacing. 22 The shock therapy, obviously, has nothing NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS

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to do with the trial anti-tachycardia pacing. Whether 1 the briefer duration of atrial tachycardia pacing is 2 less effective than the generally multiple second 3 atrial antitachycardia pacing is hard to say with such 4 a small group in the context of the larger group of 5 patients with ATP ON, but as a matter of strategy, A-V 6 node ablation does not preclude the use of the device. 7 8 DR. SIMMONS: Maybe I'll give somebody else a chance. 9 Dr. Aziz? 10 DR. TRACY: 11 DR. AZIZ: Well, I think some of mv questions are from a surgical type perspective. 12 13 Do all these patients, are they on anticoagulants for the duration of the therapy? 14 15 Do you recommend that they should be on anticoagulation? 16 17 DR. STANTON: Sixty percent of the 18 patients were taking Coumadin at various points during the trial. That was left up to the clinician. 19 20 Michael, do you want to make some 21 comments? 22 DR. GOLD: Yes. I think it was not NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVENUE, N.W. WASHINGTON, D.C. 20005

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mandated that patients be on warfarin. Certainly, my 1 clinical practice is that patients with atrial 2 fibrillation and structural heart disease should be on 3 warfarin and should be persistently on warfarin and I 4 put all my patients on that. I think they probably 5 should be on it. 6 7 DR. AZIZ: And from the analysis of your data, could you sort of give some ideas as to whether 8 the initiation of the atrial fibrillation was from the 9 10 right atrium or left atrium? Do you have that sort of data? No. 11 DR. STANTON: 12 No. 13 DR. AZIZ: Do you think that has any 14 bearing on the success of your termination of atrial 15 fibrillation as to where the etiology starts from? DR. SCHWARTZMAN: 16 That's а very interesting question, obviously, because of how the 17 field is unfolding, but the best answer would be 18 paroxysmal versus persistent, for example. So if you 19 take the patients with relatively well preserved 20 hearts, relatively small left atria, paroxysmal atrial 21 fibrillation 22 syndrome, Ι think most

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electrophysiologists would tell you that it is likely that the initiation of that entity is left atrial and depending on who you talk to, I think most of us are gravitating toward atrial fibrillation being more of a left atrial disease or not, so I don't know that that kind of data even makes sense.

The point is that regardless of clinical syndrome and regardless of cardiac structure, my experience and the multi center experience certainly demonstrates that the strategy -- the efficacy of the strategy did not change significantly. So my sense of it is that mechanism, trigger mechanism doe snot have a major influence on whether or not this strategy should be used.

15 DR. GOLD: I think if we at least use analogies of ventricular tachycardia literature, what 16 17 we know, tachycardia, ischemic heart disease are 18 coming from the left ventricular, pace termination is 19 very successful from the right ventricular as long as you can entrant an arrhythmia. If it's a re-entrant 20 arrhythmia you have a reasonable chance of being able 21 22 to terminate that arrhythmia. So being close to the

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1	arrhythmia origin probably gives you relatively little
2	benefit, incremental benefit for pace termination, at
3	least for ventricular tachycardias assuming the same
4	thing where atrial flutter has been shown that you can
5	pace terminate it anywhere, whether or not you're in
6	the circuit. So we can say very little about where
7	these arrhythmias are coming from, but it probably has
8	a minor impact in terms of the efficacy of therapy, at
9	least pacing therapy.
10	DR. AZIZ: You know, I think there were
11	four patients who had a CVA during the course of the
12	study. I think some of them had just stopped Coumadin
13	and some hadn't.
14	What do you think the etiology of that
15	was?
16	DR. GOLD: Of the four patients who had
17	strokes during the study, three of them were not on
18	warfarin at the time of their strokes. One of them
19	had had several shocks several days before that. The
20	others had not had recent, or at least immediately
21	recent shocks. Again, this reemphasizes to me the
22	importance of warfarin therapy and people with atrial
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1 fibrillation, we don't understand all the mechanisms 2 for why patients with atrial fibrillation have 3 strokes. But we do know in many, many very well controlled, large, randomized studies that 4 they benefit from warfarin therapy to reduce the risk of 5 The AFFIRM Study, which is a large NIH study 6 stroke. looking at treatment strategies mandates warfarin 7 therapy whether you're in a rhythm control arm or a 8 9 rate control arm. And I think the field is evolving 10 to the point that we should not be reassured by the 11 fact that we have a patient on an anti-arrhythmic drug that appears to be working, we should not be reassured 12 13 that we have a device that may be able to treat these arrhythmias quickly. Atrial fibrillation is a 14 pro-thrombotic state that leads to strokes and at this 15 16 point we have no data, no evidence in my mind that any treatment of atrial fibrillation, whether mechanical 17 or drug is, in fact, reducing that risk of stroke, 18 19 which is why I strongly advocate that all patients should be on warfarin if they have atrial fibrillation 20 with a history of structural heart disease regardless 21 22 of what treatment strategy we take.

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1	DR. AZIZ: Do you think the greatest
2	danger period is the time when you convert the patient
3	from atrial fibrillation back into a regular rhythm
4	for am emboli dislodging?
5	DR. GOLD: That's certainly been the
6	traditional teaching from Dr. Lown and others, but the
7	data to support that, the risk may go up during that
8	period of time, but my anecdotal experience with the
9	firm where we've had many patients in that, I've now
10	had collected, unfortunately four patients who are in
11	the rhythm control arm of a firm, who have only
12	documented sinus rhythm, never documented atrial
13	fibrillation on their drugs and four patients who have
14	had strokes. Whether they're going in and out of
15	atrial fibrillation, whether atrial fibrillation is an
16	epiphenomenon and they simply have atrial myopathies
17	that lead to strokes, I don't know. We just don't
18	have sufficient data. But we do have overwhelming
19	data in support of the use of warfarin. So I think we
20	need to hopefully use evidence-based medicine to guide
21	us in terms of our clinical management and these
22	patients, bottom line, should be on warfarin,

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regardless of whether we shock them in two minutes, 1 two hours, two days, whether they're on 2 anti-arrhythmic drugs or not. Whatever we do to them, 3 we know warfarin works and until we can prove 4 5 otherwise, that's certainly my recommendation. I'd like to make a quick 6 DR. STANTON: think 7 comment. Ι there's some interesting 8 considerations in this regard. As you know, the 9 American College of Chest Physicians recommends that 10 if a person comes in with atrial fibrillation of less 11 than 48 hours duration, then it's okay to go ahead and 12 cardiovert them even if they're not on anticoagulants. 13 I don't personally agree with that. I have used 24 14 hours and I'm not even sure that that's right. All the shocks delivered in this study 15 16 were within 24 hours. 17 DR. AZIZ: I mean you're not aware of any TCD type monitoring at the time that these shock 18 therapies are being done to see if you do have 19 increase blips going up in the middle cranial or 20 anything 21 like that, a trans-cranial Doppler 22 monitoring, you're not aware of any studies of that

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92 nature? 1 2 DR. GOLD: No, I'm not. DR. AZIZ: One other question. How do you 3 sort of decide whether to put the SVC lead versus a 4 5 coronary sinus lead, what sort of predetermines -- not being an EP guy, which lead do you put in? 6 7 DR. GOLD: I think it depends on whether 8 you get implanted in Baltimore or in Pittsburgh. (Laughter.) 9 It's largely investigative preference. I 10 11 think the lead systems -- I think David may want to 12 comment on some of those decisions. 13 DR. SCHWARTZMAN: I don't want to leave the beaten path. We've used the coronary sinus lead 14 routinely. It was and remains my preconceived bias 15 that the success of a twice DFT defibrillation will be 16 17 higher with a right atrial coronary sinus circuit than with a circuit that does not incorporate the left 18 atrium, i.e., the coronary sinus lead. That data is 19 20 being played out now. 21 Based on our preceding conversation though 22 I would agree that certainly that that data does not NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVENUE, N.W.

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prove promising, that the coronary sinus portion of 1 2 the circuit should be left at the discretion of the 3 physician for those patients in whom adequate atrial defibrillation cannot be achieved with circuits not 4 incorporating the coronary sinus lead. 5 6 DR. STANTON: Dr. Aziz, I just want to correct a statement I made before about the number of 7 shocks that were within 24 hours. 8 That was 95 9 percent, not 100 percent. 10 DR. AZIZ: In your experience has the size of the left atrium had an impact on how successful 11 your defibrillation has been or do most of your 12 13 patients have a small left atrium? 14 DR. SCHWARTZMAN: We're in the 40s now and we've seen no relationship and obviously there's a 15 biased sample in that (a) these patients 16 need demonstrable maintenance of sinus rhythm after 17 trans-thoracic cardioversion if they were persistent 18 prior to the implant; and (b) we stay away from the 19 enormous left atria so given that bias, we're talking 20 about under 6 centimeters, but within that cohort, 21 22 we've seen no significant difference. We've certainly

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seen no difference in the ability, 100 percent of our 1 patients have had an adequate defibrillation threshold 2 utilizing a right atrial coronary sinus circuit. 3 In terms of the specific threshold we've really seen 4 nothing compelling regarding a correlation between the 5 actual energy and the volume of the left atrium, if 6 7 you will. As in ventricular DFTs I think it's not so 8 9 simple. A lot of it has to do with orientation, 10 anatomy, probably things extrinsic to the heart and so that I think the structure correlation between energy 11 and structure gets washed out because of these other 12 13 competing influences. DR. GOLD: We have actually looked at that 14 15 in a little more detail, not in this series of 16 patients, not with this specific lead system, but using a uniform lead system and testing protocol with 17 a dual coil lead with one coil in the right ventricle, 18

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the other coil in the SVC right atrial junction and

then an emulator in the left pectoral region, so a

classic triad type of shocking configuration for

induced atrial fibrillation in over 100 patients now,

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1 there is a correlation between left atrial size and 2 atrial defibrillation thresholds. It's not a strong correlation, but it's statistically significant, but 3 again, as David has pointed out, we can uniformly 4 5 defibrillate patients. So large atrium may have defibrillation thresholds of 7. A smaller atrium may 6 have a threshold of 4, that sort of range with mean 7 thresholds of around 5 joules and are sort of large 8 prospective evaluation of this. So it does affect the 9 10 amount of energy, but it doesn't preclude the ability 11 to uniformly defibrillate atria in patients within the 12 established amount of energy that are provided with 13 these devices.

14 DR. AZIZ: In the patient cohort that you have, I think there were 80 percent of patients with 15 a New York Heart Association Class I or II. 16 If you 17 could sort of put your futuristic hat on, if you had patients who have lower and I think you excluded New 18 York Heart Association Class IV, but a lot of the 19 times patients in heart failure obviously do get 20 21 trouble from atrial arrhythmias. In the future, do 22 you see these devices playing a beneficial role,

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particularly in giving people the atrial kick with bad EFs? Do you see that as an application?

3 DR. SCHWARTZMAN: Well, I can address my 4 own experience. We actually have had a lot of interest from our heart failure group for their 5 patients with reduced ejection fraction 6 atrial arrhythmia attributable difficulties in controlling 7 their heart failure syndromes and we have now 18 8 9 patients of various degrees of follow up with 10 congestive cardiomyopathy, whether ischemic-based or 11 And if you put them into the analysis mix with not. patients with structurally normal hearts or preserved 12 13 ejection fraction, there's no difference in efficacy. 14 Again, I don't think the metric is six months. Ι 15 don't think months. it's 12 It's probably 16 significant. But some of the issues that we're looking at and have had anecdotal results that are 17 promising regard hospitalization. That was one of the 18 19 cases. Preservation or improvement in ejection 20 fraction, possibly related to a tachycardia mediated 21 component of left ventricular dysfunction in these 22 patients. Obviously, the patients have attributable

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symptoms and so quality of life issues. 1 2 And so the way it has played out thus far, is that that is a particularly interesting population 3 and I think as device-based therapies evolve we will 4 5 gravitate more and more to the patient with cardiac co-morbidity, i.e., congestive heart failure, reduced 6 7 left ventricular function. 8 DR. GOLD: I'd like to echo a similar sentiment. I have the most enthusiasm for using this 9 10 type of therapy in patients with the most underlying 11 heart disease. Our interest has been largely in 12 applying this to patients of coronary disease and particularly congestive heart failure. 13 14 We've had the same experience that it 15 works well having the backup ventricular defibrillation is reassuring, particularly in patients 16 with a lot of structural heart disease and low 17 ejection fractions and we are beginning an 18 19 IDE-approved study through the FDA to, in fact, 20 evaluate the use of this device in a randomized 21 fashion in patients with congestive heart failure. So our experience anecdotally is that it works well and 22

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1 I think it's going to be a very important substrate 2 for the use of rhythm stabilization in which drug 3 therapy is fraught with problems of limited use 4 because contraindications, of increased para 5 arrhythmia and other problems in that population. 6 DR. AZIZ: Just two quick small questions. 7 surgical type population you've excluded In а obviously patients with mechanical tricuspid valves, 8 9 but biological prosthetic valves I presume it's okay to use that? 10 DR. SCHWARTZMAN: 11 Yes. 12 DR. AZIZ: By the same token, sometimes people with heart transplants who have repeated 13 biopsies done, you don't see any problem using this 14 15 sort of device in those patients who luckily don't get 16 a lot of atrial arrhythmias on this? What do you say about that? 17 18 DR. SCHWARTZMAN: These are biopsies --19 DR. AZIZ: Heart transplant patients who obviously have repeated heart biopsies with the 20 boptome being put through the tricuspid valve. Do you 21 22 that patient population as being see а NEAL R. GROSS

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contraindication to its use or haven't you addressed that?

DR. STANTON: None of the patients had heart transplant prior to having the device implant so we don't have any data on it. I'm not sure if it would necessarily contraindicated, but it would certainly be a rare occurrence.

8 DR. GOLD: Surely, there's а long literature for pacing those patients if they need 9 10 So putting leads across the tricuspid pacemakers. transplant patient requires frequent 11 valve in a 12 biopsies is well established. These leads are 13 slightly larger, but certainly placing leads across 14 those valves are commonly done.

MR. BROWN: Just one last -- the incidence 15 of atrial fibrillation in cardiac surgery patients, 16 17 obviously, is very variable and I see in your protocol you exclude patients within a month of cardiac 18 surgery.

20 Do you have experience with patients who have a very persistent fibrillation tachyarrhythmias 21 22 a month or more after cardiac surgery in this mix of

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1	patients?
2	DR. STANTON: We haven't been able to
3	slice the data that way to answer that question right
4	now.
5	I think as you point out though the reason
6	we had that as an exclusionary is one third or so of
7	people after thoracotomy having atrial fibrillation,
8	that's not the patient group we wanted to include.
9	DR. TRACY: Dr. Crittenden?
10	DR. CRITTENDEN: Tony and Salim really
11	asked the questions that I was concerned about, but I
12	just have one kind of educational question is can
13	you tell me that none of these patients seem to get
14	symptomatic relief from the examples that you had this
15	morning. As soon as they were cardioverted they felt
16	better. I was under the impression and maybe this is
17	a wrong impression that conversation to sinus rhythm,
18	electrical conversion to sinus rhythm doesn't always
19	translate into an effective atrial transport
20	mechanism. We see a lot of symptomatic relief based
21	on the SF-36 scores. Can you kind of correlate all of
22	that for me to help me understand a little better?

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