

The microstim was originally designed in MRI by a team of Medical Physicist Technicians led by Malcolm Purnell.

CE marking did not exist.
ISO 9000 (BS5750) was not in operation and it was not until the mid 1990's that MRI & Vitrol achieved ISO 9000 for design.

The current microstim file can therefore only be re-written as a product already designed & manufactured with a 10 year track record before the current legislation.

I believe we can only update the file as long as we do not falsify information not originally existing.

- 1) We can update safely
essential requirements
change to design etc.
- 2) We can complete the risk assessment assuming we were starting now but still endorse with the current design. Unless the current product is "unsafe".
- 3) TMC. The product was designed pre BAC legislation but was tested clinically in severe TMC conditions i.e. 'threats'. We need to confirm that the existing rationale is still valid.
- 4) New information can be added to the file as long as it adds to its value and does not have the effect of reducing product credibility. This would certainly mean a product withdrawal & re-design. Probably not economic.

[Signature] 08/06/03