



DiA Imaging Analysis Ltd.
% George Hattub
Senior Project Manager
Medicsense USA
291 Hillside Avenue
SOMERSET MA 02726

September 29, 2020

Re: K202546
Trade/Device Name: LVivo Seamless
Regulation Number: 21 CFR 892.2050
Regulation Name: Picture archiving and communications system
Regulatory Class: Class II
Product Code: QIH
Dated: August 31, 2020
Received: September 2, 2020

Dear George Hattub:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm> identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for

devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance>) and CDRH Learn (<https://www.fda.gov/training-and-continuing-education/cdrh-learn>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

For

Thalia T. Mills, Ph.D.
Director
Division of Radiological Health
OHT7: Office of In Vitro Diagnostics
and Radiological Health
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)

K202546

Device Name

LVivo Seamless

Indications for Use (Describe)

LVivo platform is intended for non-invasive processing of ultrasound images to detect, measure, and calculate relevant medical parameters of structures and function of patients with suspected disease.

Type of Use (Select one or both, as applicable)

Prescription Use (Part 21 CFR 801 Subpart D)

Over-The-Counter Use (21 CFR 801 Subpart C)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

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510(k) Summary

K202546

Pursuant to CFR 807.92, the following 510(k) Summary is provided:

1. (a) **Submitter Address:** George J. Hattub
Medicsense USA LLC
291 Hillside Avenue
Somerset, MA 02726
ghattub@comcast.net
<https://www.upwork.com/freelancers/~0196e832ca4b82a2f3?viewMode=1>
1. (b) **Manufacturer Address:** DiA Imaging Analysis Ltd
HaEnergia Street 77
Beer-Sheva, Israel 8470912

Mfg. Phone: Tel.: +972 77 7648318

Contact Person: Mrs. Michal Yaacobi

Date: September 21, 2020
2. **Device & Classification Name:** Automated Radiological Imaging Processing Software - classified as Class 2 QIH, Regulation Number 21 CFR 892.2050
LVivo Seamless
3. **Predicate Device:** K200232 LVivo Software Application
4. **Description:** The LVivo Seamless is a standalone application that extends the LVivo Platform and runs offline on a server in a healthcare environment. The system accepts echo examinations in DICOM format that are sent from an Ultrasound device and automatically selects the adequate clips for EF evaluation. After the clip selection, the LVivo Seamless activates the FDA cleared LVivo EF module which performs automatic evaluation. The results are sent to the PACS and are evaluated by a healthcare professional.
5. **Intended Use:** LVivo platform is intended for non-invasive processing of ultrasound images to detect, measure, and calculate relevant medical parameters of structures and function of patients with suspected disease
6. **Comparison of Technological Characteristics:** With respect to technology and intended use, DiA's LVivo Seamless is substantially equivalent to its predicate device. Based upon the outcomes from the risk analysis and Performance Testing Evaluation, DiA believes that the modification of the predicate device does not raise additional safety of efficacy concerns. The following comparison table depicts the changes.

	Submitted Device	Predicate Device
Features/Characteristics	LVivo Seamless	LVivo Software Application
Product Code	QIH	QIH
Indication for Use	LVivo platform is intended for non-invasive processing of ultrasound images to detect, measure, and calculate relevant medical parameters of structures and function of patients with suspected disease.	LVivo platform is intended for non-invasive processing of ultrasound images to detect, measure, and calculate relevant medical parameters of structures and function of patients with suspected disease.
Modules	LVivo EF	LVivo EF, LVivo SG, LVivo SAX, LVivo RV & LVivo Bladder
Automation	same	yes
Manual Adjustment	no	yes
Bi plane EF evaluation	same	yes
Simultaneous 2CH and 4CH evaluation	same	yes
Off-line EF evaluation using DICOM clips of any vendor	same	yes
Automated ED and ES frames selection	same	yes
Dynamic left ventricular	no	yes
Manual editing by user capability	no	yes
Visually confirm EF	same	yes

Automated rejection of false results	same	yes
Volume calculation by standard Simpson's method of discs	same	yes
Volume curve Presentation	no	yes
EF results presentation	same	yes
Enables presentation EF results for different cycle	Same results are presented for the default beats	yes
Algorithm	same	yes
Calculation speed	same	yes
Capability or a part of a bigger package (device) for LV function	same	yes
Segmental Longitudinal Strain Measure	no	yes
Global Longitudinal Strain Measure	same	yes
Segmental wall motion evaluation	no	yes
Operating System	same	Windows/Linux (with Android option for LVivo EF)
510(k) #	Pending	K200232

7. Performance Evaluation: A summary of the Performances Evaluation, which was based upon well-established test methods, demonstrated conformity to intended use.

8. Conclusion: The Intended Use and the technological characteristics in the current device are the same as those in the predicate device, and the minor changes from the predicate device, including the offline application in the institutional server and changes in the user input on the final images, do not affect the safety and effectiveness of the device. The performance tests have been completed and successfully support the device performance. Therefore, DiA Imaging Analysis concludes that LVivo Seamless software is substantially equivalent to the predicate device.