June 16, 2022

Zhejiang Yinchili Medical Technology Co., Ltd.
℅ Ivy Wang
Technical Manager
Shanghai Sungo Management Consulting Company Limited
14th Floor, 1500# Central Avenue
Shanghai, Shanghai 200122
CHINA

Re: K203624
Trade/Device Name: Custom-made Invisible Aligners
Regulation Number: 21 CFR 872.5470
Regulation Name: Orthodontic Plastic Bracket
Regulatory Class: Class II
Product Code: NXC
Dated: May 7, 2022
Received: May 12, 2022

Dear Ivy Wang:

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,

Michael E. Adjodha, M.ChE.
Assistant Director
DHT1B: Division of Dental and
ENT Devices
OHT1: Office of Ophthalmic, Anesthesia,
Respiratory, ENT and Dental Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: 06/30/2023
See PRA Statement below.

510(k) Number *(if known)*
K203624

Device Name
Custom-made Invisible Aligner

Indications for Use *(Describe)*
The Custom-made Invisible Aligners is indicated for the treatment of tooth malocclusion in patients with permanent dentition (i.e., all second molars). The Custom-made Invisible Aligners positions teeth by way of continuous gentle force.

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.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services
Food and Drug Administration
Office of Chief Information Officer
Paperwork Reduction Act (PRA) Staff
PRAStaff@fda.hhs.gov

"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."

K203624

510(K) Summary

This summary of 510(K) safety and effectiveness information is being submitted in accordance with the requirement of 21 CFR 807.92.

A. Applicant:

Zhejiang Yinchili Medical Technology Co., Ltd.
Address: North 4F, Building 1, No.239 Yatai Road, Daqiao Town, Nanhu District, Jiaxing, Zhejiang Province, China
Contact Person: Ms. Hangli Chen
Tel: +86-15024335314
Email: chenhangli@smartee.cn
Date of summary prepared: 2022-05-24

Submission Correspondent:
Primary contact: Ms. Ivy Wang
Shanghai SUNGO Management Consulting Co., Ltd.
Room 1309, Dongfang Building, 1500# Century Ave., Shanghai 200122, China
Tel: +86-21-58817802
Email: haiyu.wang@sungoglobal.com
Secondary contact: Mr. Raymond Luo
Room 1309, Dongfang Building, 1500# Century Ave., Shanghai 200122, China
Tel: +86-21-68828050
Email: fda.sungo@gmail.com

B. Device:

Trade Name: Custom-made Invisible Aligners
Common Name: Sequential Aligners
Regulatory Information
Classification Name: Aligner, Sequential
Classification: Class II
Product code: NXC
Regulation Number: 21 CFR 872.5470
Review Panel: Dental

C. Primary Predicate device:

K180346
Byte Aligner System
Straight Smile, LLC

D. Indications for use of the device:

The Custom-made Invisible Aligners is indicated for the treatment of tooth malocclusion in patients with permanent dentition (i.e., all second molars). The Custom-made Invisible Aligner positions teeth

by way of continuous gentle force.

E. Device Description:

The Custom-made Invisible Aligners System is a series of dental aligners that are fabricated of clear, thin thermoformed Polyethylene terephthalate (PETG) plastic to progressively reposition the teeth. Corrective force to reposition the teeth is delivered via minor changes into a position in each subsequent aligner.

F. Comparison to predicate device

The Custom-made Invisible Aligners is substantially equivalent in intended use, indications for use, mode of action, mode of use, design, and materials to the predicate Straight Smile Byte Aligner System (K180346). Only minor differences exist between the subject product and the predicate, which do not affect the safety or effectiveness of the subject device.

Table 1 provides a comparison of the subject and predicate device.

Table 1: Comparison to Predicate Device

Device	**Subject Device**	**Primary Predicate Device**	**Result**
Manufacturer	Zhejiang Yinchili Medical Technology Co., Ltd.	Straight Smile, LLC	-
510K number	K203624	K180346	-
Model Name	Custom-made Invisible Aligners	Byte Aligner System	-
Classification	Class II Device, NXC (21 CFR 872.5470)	Class II Device, NXC (21 CFR 872.5470)	Same
Classification Name	Aligner, Sequential	Aligner, Sequential	Same
Indications for use	The Custom-made Invisible Aligners is indicated for the treatment of tooth malocclusion in patients with permanent dentition (i.e., all second molars). The Custom-made Invisible Aligner positions teeth by way of continuous gentle force.	The Byte Aligner System is indicated for the treatment of tooth malocclusion in patients with permanent dentition (i.e., all second molars). The Byte Aligner System positions teeth by way of continuous gentle force.	Same
Mode of Action	Orthodontic tooth movement occurs through forces applied by the device to the dentition as each tooth follows the programmed displacement based on a doctor's prescription.	Orthodontic tooth movement occurs through forces applied by the device to the dentition as each tooth follows the programmed displacement based on a doctor's prescription.	Same

Anatomical Site of Use	Oral cavity	Oral cavity	Same
Mode of Use	Each aligner is worn by the patient as determined by the treating dental practitioner, generally for 22 hrs/day (or full time except for eating and hygiene) for 2 weeks prior to being replaced by the next aligner in sequence. This is repeated for a duration as prescribed by a Dental Professional.	Each aligner is worn by the patient as determined by the treating dental practitioner, generally for 2 weeks prior to being replaced by the next aligner in sequence. This is repeated for a duration as prescribed by a Dental Professional.	Same
Application	Removable	Removable	Same
Raw Material Used	Thermoplastic copolyester (polyethylene terephthalate-ethylene glycol copolyester)	Thermoplastic polymers (polyethylene terephthalate glycol or PETG)	Similar. Both are thermoplastic forming materials that do not raise any additional questions of safety or efficacy.
Method of Manufacturing	Thermoforming	Thermoforming	Same
OTC or Rx	Rx	Rx	Same
Sterile	No	No	Same
Biocompatibility	In compliance with ISO 10993, tests including Cytotoxicity Oral Mucosa Irritation Sensitization	In compliance with ISO 10993, tests including Cytotoxicity Sensitization	Similar. Both are in compliance with ISO 10993
Design		Byte Aligner System 	Similar. Both are transparent plastic films.

G. Non-clinical Test

1) Performance Testing

Bench testing has demonstrated that the device is in compliance with pertinent standards and

specifications, the expectations of the dental community and the product labeling. A comparison testing was performed in combination with the subject and predicate device including thickness, appearance, odor, density, water absorption, dissolution, color stability, tear resistance, wear resistance, flexural modulus of elasticity. Please see below table 2.

Test item	Test standard/method	Acceptance criteria	Result
Thickness	Internal standard "ZMT-FD-SS-052"	≤1.2mm	Pass
Appearance		No crack or bubbling; No defects	Pass
Odor		Odorless	Pass
Density	ASTM D792-2013	≤2.6g/cm^3	Pass
Water absorption	ISO20795.1-2013	≤32μg/mm^3	Pass
Dissolution	ISO20795.1-2013	≤1.6μg/mm^3	Pass
Color stability	ISO20795.1-2013	No change	Pass
Tear resistance	ISO6383.1-2015	＞200N/cm	Pass
Wear resistance	ISO9352-2012	＜0.25g/1000r	Pass
Flexural modulus of elasticity	ISO20795.1-2013	≥600Mpa	Pass

The results showed that the subject device is as effective as the predicate device.

Manufacturing validation accuracy testing

Manufacturing accuracy validation were conducted to the Custom-made Invisible Aligners. Aligners from 12 different patient case were evaluated at the beginning, middle and end throughout the sequence. The accuracy of 3D molding and aligner molding are checked and meet the pre-established specification. The suitability, function and form of the aligner were checked and comparing it to the treatment design in the software, and the results were comply with the pre-established specifications and acceptance criteria.

Shelf life – 2 years

A 2-year shelf life was determined by real-time aging testing. Performance testing were conducted after 30 months real-time aging under commercial storage condition. The test results showed conformity with the pre-established specifications and acceptance criteria.

2) Biocompatibility Testing

The biocompatibility evaluation for the device was conducted in accordance with "Use of International Standard ISO 10993-1, Biological evaluation and testing within a risk management process –Guidance for Industry and Food and Drug Administration Staff" as recognized by FDA. The aligner is considered mucosal membrane contacting for a duration of greater than 30 days. The testing included the following tests:

- Cytotoxicity
- Irritation
- Sensitization

The results of the testing met the requirements of the study protocols and the material is considered non-cytotoxic, non-sensitizing and is not an intracutaneous irritant. The results of the studies further support a determination of substantial equivalence.

3) Software Verification and Validation Testing

Software verification and validation testing were conducted on the software that facilitates ordering and processing of the Custom-made Invisible Aligner to support that the device is as safe and effective as the predicates. Documentation was provided as recommended by FDA's Guidance for Industry and FDA Staff, "Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices." The software for this device was considered as a "moderate" level of concern.

H. Clinical Test Conclusion

No clinical study is included in this submission.

I. Conclusion

The conclusions drawn from the nonclinical tests demonstrate that the subject device is as safe, as effective, and performs as well as or better than the legally marketed predicate device K180346.