

December 8, 2020

Shenzhen Konmed Technology Co., Ltd.
% Tracy Che
Registration Engineer
Feiying Drug & Medical Consulting Technical Service Group
Rm 2401 Zhenye International Business Center, No. 3101-90,
Qianhai Road
Shenzhen, Guangdong 518052
China

Re: K202648

Trade/Device Name: Biofeedback Nerve and Muscle Stimulator Regulation Number: 21 CFR 890.5850 Regulation Name: Powered Muscle Stimulator Regulatory Class: Class II Product Code: IPF, KPI, HCC Dated: September 7, 2020 Received: September 11, 2020

Dear Tracy Che:

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 <u>https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems</u>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance</u>) and CDRH Learn (<u>https://www.fda.gov/training-and-continuing-education/cdrh-learn</u>). 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 (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</u>) for more information or contact DICE by email (<u>DICE@fda.hhs.gov</u>) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

for Heather Dean, PhD Assistant Director DHT5B: Division of Physical Medicine- Acute Injury Devices OHT5: Office of Neurological and Physical Medicine Devices Office of Product Evaluation and Quality Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number *(if known)* K202648

Device Name

Biofeedback Nerve and Muscle Stimulator (Model: KM530, KM531)

Indications for Use (Describe)

As a powered muscle stimulator the Biofeedback Nerve and Muscle Stimulator is indicated for the following conditions:

·Relaxation of muscle spasm

·Prevention or retardation of disuse atrophy

·Increasing local blood circulation

·Muscle re-education

Immediate post-surgical stimulation of calf muscles to prevent venous thrombosis

·Maintaining or increasing range of motion

As a biofeedback device the Biofeedback Nerve and Muscle Stimulator is indicated for the following conditions: •Biofeedback, relaxation and muscle re-education purposes

As a nonimplanted electrical continence device the Biofeedback Nerve and Muscle Stimulator is indicated for the following conditions:

•Acute and ongoing treatment of stress, urge or mixed urinary incontinence and where the following results may improve urinary control: Inhibition of the detruser muscles through reflexive mechanisms and strengthening of pelvic floor muscles.

·Incontinence treatment for assessing EMG activity of the pelvic floor and accessory muscles such as the abdominal and the gluteus muscles.

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

K202648

This "510(k) Summary" of 510(k) safety and effectiveness information is submitted in accordance with requirements of Title 21, CFR Section 807.92.

(1) Applicant information:

510(k) owner's name:	Shenzhen Konmed Technology Co., Ltd.
Address:	601, Building B4, Shenchengtou Creative Factory Life Science Park,
	Julongshan A Road, Xiuxin Block, Kengzi Street, Pingshan District,
	Shenzhen, Guangdong, CHINA, 518118
Contact person:	Shuishan Yin
Title	General manager
Phone number:	+86 755 8670 4556
Fax number:	+86 755 8670 4556
Email:	2519021651@qq.com
Date of summary prepared:	December 3, 2020

(2) Reason for the submission

New device, there were no prior submissions for the device.

(3) Proprietary name of the device

Trade name/model:	Biofeedback Nerve and Muscle Stimulator/ KM530, KM531
Common name:	Powered muscle stimulator
	Non-implantable electrical continence device
	Biofeedback device
Regulation number:	21 CFR 890.5850
	21 CFR 876.5320
	21 CFR 882.5050
Product code:	IPF, KPI, HCC
Review panel:	Physical Medicine
	Gastroenterology/Urology
	Neurology
Regulation class:	Class II

(4) Predicate and reference device

> Predicate device

Sponsor	Otto Bock Healthcare Product GmbH
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Device Name and Model	STIWELL med4/ Model: 900101S	
510(k) Number	K080950	
Product Code	IPF, GZI, KPI, GZJ, HCC	
	21 CFR 890.5850	
	21 CFR 876.5320	
Regulation Number	21 CFR 882.5050	
	21 CFR 882.5890	
	21 CFR 882.5810	
Regulation Class	Ш	

Reference device

Sponsor	Thought Technology Ltd	Mantra International (HK)	
	Thought reenhology Etd	Ltd	
Device Name and Model	MyoTrac Infiniti System	Kegel8	
510(k) Number	K053434	K081480	
Product Code	IPF, KPI, HCC	KPI	
	21 CFR 890.5850		
Regulation Number	21 CFR 882.5050	21CFR876.5320	
	21 CFR 876.5320		
Regulation Class	Π	II	

(5) Description/ Design of device:

This Biofeedback Nerve and Muscle Stimulator is a new type of biofeedback and neuromuscular electrical stimulation therapy device through the evaluation of myoelectric signal acquisition, multimedia biofeedback training, electromyography triggered electrical stimulation, passive electrical stimulation training and treatment.

There are two models of Biofeedback Nerve and Muscle Stimulator which are KM530 and KM531. Their intended use, working principle, product structure and major parameters are all same, apart from the difference of product appearance, and KM531 has several more programs than KM530.

The device is battery-powered with a display screen and offers the user a choice of EMG Test (Only for EMG acquisition, not for electrical stimulation), EMG Game (6 biofeedback responsebased vivid games, active training for the user to contract the muscles of the treatment area, no electrical stimulation is generated), ETS (electromyography triggered stimulation; Only when the EMG value reaches the set threshold, the electrical stimulation is triggered; This module is a combination of active and passive treatment module, which exercise the self-contracting ability of the user), and STIM (Neuromuscular stimulation with fixed programs and customized programs of which parameters can be adjusted under the directions of physicians or professionals).

The device is supplied with vaginally inserted probe used with the device to stimulate the muscle of the pelvic floor (the probe is identical to that used in the model KM518 with 510(k) number

K163288). Anal probe is optional, user can choose to purchase qualified probe. The device is supplied with biofeedback reference lead wire with skin electrodes. The device main unit connects directly to the vaginal electrode and reference wire by cable and plug. The device provides independent dual-channel EMG signals acquisition and dual-channel electrical stimulation output which is convenient for the treatment of different sites.

(6) Indications for use:

As a powered muscle stimulator the Biofeedback Nerve and Muscle Stimulator is indicated for the following conditions:

- Relaxation of muscle spasm
- Prevention or retardation of disuse atrophy
- Increasing local blood circulation
- Muscle re-education
- Immediate post- surgical stimulation of calf muscles to prevent venous thrombosis
- Maintaining or increasing range of motion

As a biofeedback device the Biofeedback Nerve and Muscle Stimulator is indicated for the following conditions:

• Biofeedback, relaxation and muscle re-education purposes

As a nonimplanted electrical continence device the Biofeedback Nerve and Muscle Stimulator is indicated for the following conditions:

• Acute and ongoing treatment of stress, urge or mixed urinary incontinence and where the following results may improve urinary control: Inhibition of the detruser muscles through reflexive mechanisms and strengthening of pelvic floor muscles.

• Incontinence treatment for assessing EMG activity of the pelvic floor and accessory muscles such as the abdominal and the gluteus muscles.

Component name	Material of Component	Body Contact Category	Contact Duration
Electrode	Three layers:	Surface-contacting	Less than 24 hours
patches	1. Insulation backing	device: Intact skin	
	material:		
	Fabric/Foam/Tan fabric		
	2. Conductive film:		
	Carbon film/Carbon film		
	coated with silver/Aluminum		
	foil film		

(7) Materials

	3. Conductive hydrogel (A, T or U gel)		
Vaginal probe	ABS plastic, stainless steel	Surface-contacting	Less than 24 hours
		device: Mucosal	
		membrane	

We have selected 510(k) cleared electrode patches to be used with our device, its 510(k) number is K160138 (model: OCWN2505), and its biocompatibility complies with ISO 10993. The vaginal probe is the same probe with that used in another model KM518 manufactured by our company, which has already obtained 510(k) number K163288 on 01/18/2018, biocompatibility test reports were submitted during that application. For details, please refer to "Biocompatibility Discussion".

(8) Technological characteristics and substantial equivalence:

Item	Targeted device	Predicate device 1	Reference device 1	Reference device 2	Remark
Trade name	Biofeedback Nerve and Muscle Stimulator	STIWELL med4/ Model: 900101S	MyoTrac Infiniti System	Kegel8	/
510 (k) number	K202648	K080950	K053434	K081480	/
Manufacturer	Shenzhen Konmed Technology Co., Ltd	Otto Bock Healthcare Product GmbH	Thought Technology Ltd	Mantra International (HK) Ltd	/
Regulation number	21 CFR 890.5850 21 CFR 876.5320 21 CFR 882.5050	21 CFR 890.5850 21CFR876.5320 21CFR882.5050 21CFR882.5890 21CFR882.5810	21 CFR 890.5850 21 CFR 882.5050 21CFR876.5320	21CFR876.5320	Same
Regulation description	Powered muscle stimulator; Nonimplanted electrical continence device;Biofeedback device	Powered muscle stimulator; Nonimplanted electrical continence device;Biofeedbackd evice; Transcutaneouselectr icalnervestimulatorfo rpainrelief;Externalfu nctionalneuromuscul arstimulator	Powered muscle stimulator;Biofeedb ackdevice; Nonimplanted electrical continence device	Non-implanted electrical continence device	Same
Product code	IPF, KPI, HCC	IPF, KPI, HCC, GZJ,GZI	IPF, HCC, KPI	КРІ	Same
Class	II	II	II	II	Same

Indications	As a powered	The STIWELL med4	The MyoTrac	The 'Kegel8' Pelvic	Similar,
for use/	muscle stimulator	is a neuromuscular	Infiniti system is	Muscle Trainer is	the
Intended use	the Biofeedback	electronic stimulator	indicated for acute	intended to provide	indicatio
	Nerve and Muscle	indicated for use	and ongoing	electrical	ns for
	Stimulator is	under medical	treatment of stress,	stimulation and	use of
	indicated for the	supervision for	urge or mixed	neuromuscular re-	the
	following	adjunctive therapy in	urinary incontinence	education for	targeted
	conditions:	the treatment of	and where the	the purpose of	device is
	· Relaxation of	medical diseases and	following results	rehabilitation of	within
	muscle spasm	conditions.	mayimprove urinary	weak pelvic floor	that of
	· Prevention or	As a powered muscle	control: Inhibition of	muscles for the	the
	retardation of disuse	stimulator the	the detruser muscle	treatment of stress	predicate
	atrophy	STIWELL med4 is	through reflexive	urge and mixed	device
	 Increasing local 	indicated for the	mechanisms,	urinary	
	blood circulation	following conditions:	strengthening of	incontinence in	
	· Muscle re-	· Relaxation of	pelvic floor muscle.	Women.	
	education	muscle spasm	It is also indicated		
	· Immediate post-	· Prevention or	duringincontinence		
	surgical stimulation	retardation of disuse	treatment for		
	of calf muscles to	atrophy	assessing EMG		
	prevent venous	 Increasing local 	activity of the pelvic		
	thrombosis	blood circulation	floor and accessory		
	· Maintaining or	· Muscle re-	muscles such as the		
	increasing range of	education	abdominal or gluteal		
	motion	 Immediate post- 	muscles.		
		surgical stimulation	The MyoTrac		
	As a biofeedback	of calf muscles to	Infiniti system is		
	device the	prevent venous	also indicated for the		
	Biofeedback Nerve	thrombosis	ongoing treatment of		
	and Muscle	· Maintaining or	thefollowing		
	Stimulator is	increasing range of	conditions:		
	indicated for the	motion	Relaxation of Muscle		
	following	As a transcutaneous	Spasms, Prevention		
	conditions:	electrical nerve	or retardation of		
	· Biofeedback,	stimulator for pain	disuse atrophy,		
	relaxation and	relief the STIWELL	increasing local		
	muscle re-education	med4 is indicated for	blood circulation,		
	purposes	the	immediate post-		
		followingconditions:	surgical		
	As a nonimplanted	· Symptomatic relief	stimulation of calf		
	electrical continence	and management of	muscles to prevent		
	device the	chronic (long-term),	venous thrombosis,		
	Biofeedback Nerve	intractable pain	Maintaining or		
	and Muscle	· Adjunctive	increasingrange of		

r				r	
	timulator is	treatment in the	motion and Stroke		
	ndicated for the	management of post-	Rehab by Muscle re-		
fo	ollowingconditions	surgical pain and	education. Itis also		
:		post traumatic acute	used for		
• 1	Acute and ongoing	pain.	Biofeedback,		
tre	eatment of stress,	As a biofeedback	Relaxation &		
ur	rge or mixed	device the STIWELL	MuscleRe-		
ur	rinary incontinence	med4 is indicated for	Education purposes.		
ar	nd where the	the following			
fo	ollowing results	conditions:			
m	nay improve	· Biofeedback,			
ur	rinary control:	relaxation and			
In	nhibition of the	muscle re-education			
de	etruser muscles	purposes			
th	nrough reflexive	As an external			
m	nechanisms and	functional			
st	trengthening of	neuromuscular			
pe	elvic floor muscles	stimulator the			
•	Incontinence	STIWELL med4 is			
tro	eatment for	indicated for the			
as	ssessing EMG	following conditions:			
	ctivity of the pelvic	· Helps to relearn			
	loor and	voluntary motor			
ac	ccessorymuscles	functions of the			
	uch as the	extremities			
	bdominal and the	As a nonimplanted			
	luteus muscles	electrical continence			
0-		device the STIWELL			
		mad4 is indicated for			
		the following			
		conditions:			
		 Acute and ongoing 			
		treatment of stress,			
		urge or mixed			
		urinary incontinence			
		and where the			
		following results			
		may improve urinary			
		control: Inhibition of			
		the detruser muscles			
		through reflexive			
		mechanisms and			
		strengthening of			
		pelvic floor muscles			

		· Incontinence			
		treatment for			
		assessing EMG			
		activity of the pelvic			
		floor and accessory			
		muscles such as the			
		abdominal and the			
		gluteus muscles			
Patient	Adult	Adult	Adult	Adult	Same
population	Adult	7 tout	7 Kullt	Mun	Same
<u> </u>	Ducconintion	Ducconintion	Ducconintion	Dressintion	Same
Location for	Prescription	Prescription	Prescription	Prescription	Same
use					
Basic unit spe			Г	[[
Power	7.4V DC/1200mAh	Battery Pack Li-lon	4X AAA 1.5	9V PP3	Different
supply	rechargeable lithium	11.1V	Alkaline or		Note 1
	battery		rechargeable NiMH		
			Battery pack		
			6VDC-15W Medical		
			Class II power		
			adapter		
Method of	N/A	Medical Class II	N/A	N/A- Battery	Same
Line Current		Power Adapter		powered	
Isolation		*		*	
Leakage	N/A (Battery)	N/A (Battery)	N/A	N/A- Battery	Same
current				powered	
- Normal				F	
condition					
- Single fault					
condition					
Number of	2	1	/	1	Different
	Z	1	/	1	
output modes					Note 2
Number of	2	4	/	2	Same
	2	4	/	2	Same
output					
channel	a 1	A.1			
-	Synchronous	Alternating		Synchronous/	Similar
Synchronous				Alternating	
or					
Alternating?					
Method of	Transformer	Transformer,	/	Individually	Same
channel		inductive couplers		isolated circuits	
isolation		-			
Software/	Yes	Yes	Yes	Yes	Same
Firmware/					
I mmware/					

Microprocess					
or Control?					
	Yes	Vec	1	Not auhlight	Same
Automatic	ies	Yes	/	Not publicly	Same
Overload				available	
trip	37	X 7			0
Automatic	Yes	Yes	/	Not publicly	Same
no-load trip				available	
Patient	Yes	Yes (Stop Button)	/	Not publicly	Similar
override				available	
control					
method					
Indicator	Yes	Yes	/	Yes	Same
display					
-On/Off					
status					
-Low battery					
-Output					
mode					
-Time to cut-					
off					
-Voltage/					
current level					
Automatic	Yes	Yes	/	Yes	Same
Shut Off					
Timer range	1-99min, adjustable	2-120min	/	Up to 90	Similar
Dimensions	KM530:	175×95×30mm	/	6.2cm W x 2.3cm	Different
	140.5×25.5×69mm			D x 10.8cm H	Note 3
	KM531:			[2.4" W x 0.9" D x	
	146.5×29×74mm			4.25" H]	
Weight	KM530: 192 g	440g	/	0.07 Kg without	Different
-	KM531: 230g			battery, 0.1KG	Note 3
				with battery	
Housing	Plastic	Plastics	/	/	Same
material and					
construction					
Compliance	IEC 60601-1;	IEC 60601-1;	IEC 60601-1;	IEC 60601-1;	Same
with	IEC 60601-1-2;	IEC 60601-1-2;	IEC 60601-1-2;	IEC 60601-1-2;	
voluntary	IEC 60601-2-10;	IEC 60601-2-10	IEC 60601-2-10	IEC 60601-2-10	
standards	IEC 60601-1-11;	-			
	IEC 60601-2-40				
Compliance	Yes	Yes	Yes	Yes	Same
with 21CFR					
898					

Output specif	ications				
Waveform	Pulsed symmetric, asymmetric, biphasic square wave	Pulsed symmetrical, rectangular wave	Asymmetrical Balanced Pulsed Current	Biphasic, Rectangular	Similar
Maximum output voltage	47.2V @ 500Ω 108V @ 2kΩ 150V @ 10kΩ	50V@500Ω 115V@2kΩ N/A	/	45V @ 500Ω 100V @ 2kΩ 190V @ 10kΩ	Similar Within the range of predicate device
Maximum output current	94.4mA @ 500Ω 54mA @ 2kΩ 15mA@ 10kΩ	100mA@500Ω 58mA@2kΩ N/A	100mA	90mA @ 500Ω 50mA @ 2kΩ 19mA @ 10kΩ	Similar Within the range of predicate device
Net Charge (per pulse)	Forpulsedsymmetric,biphasic: 0μ C 500Ω ;Forpulsedasymmetric,biphasic:15.68μC $@$ 500Ω	0μC @ 500Ω	/	0 [μC] @ 500Ω	Similar Note 4
Maximum Phase Charge (500Ω)	51.4µC @ 500Ω	EMS: 40μC @500Ω Incontinence: 50μC @ 500Ω	60µC	40.5μC @ 500Ω	Similar
Maximum current density (500Ω)	6.01mA/ cm ² @ 500Ω	EMS: 12.5mA/cm ² @ 500Ω Incontinence: 4.7mA/cm ² @ 500Ω	St-CloudVaginal6.76mA/cm2FemelexVaginal4.76mA/cm2St-CloudRectal19.72mA/cm2	14.1 [mA/cm ²]	Similar
Maximum power density (500Ω)	0.012W(12mW) / cm2@ 500Ω	EMS: 7.9mW/cm ² @ 500Ω (0.0079W/cm ² @ 500Ω) Incontinence: 23.5μW/cm ² @ 500Ω	St-Cloud Vaginal 22.84mW/cm ² Femelex Vaginal 11.32mW/cm ² St-Cloud Rectal 194mW/cm ²	57 $[mW/cm^2]$ At maximum frequency of 100Hz, pulse width 450 μ S and current of 90mA PC Electrode area: 6.4 cm ²	Similar

Pulse	2-100Hz	1-140Hz	12.5,50,100,200Hz	2 to 100Hz	Similar		
frequency							
Pulse	50-450µs	50-400µs	0.2ms	50 to 450 [µsec]	Similar		
duration				Program dependent			
Biofeedback performance							
Number of	2	2	2	/	Same		
EMG							
channel							
EMG	3kHZ	3kHz	/	/	Same		
sampling rate							
EMG	Bipolar	Bipolar	Bipolar	/	Same		
detection							
(bipolar/							
monopolar)							
EMG range	0.2-2000µV	1-2000µV	0-5, 0-10, 5-10, 0-	/	Similar		
(µV)			20, 5-20, 10-20, 0-				
			50, 10-50, 0-100,				
			50-100,0-200, 50-				
			200, 100-200, 0-				
			500,100-500, 0-				
			1000, 0-2000				
EMG	20Hz-500Hz	70-480Hz	20Hz-500Hz	/	Same		
bandwidth							
EMG signal	Root mean square	AVR	Root mean square	/	Same		
processing	(RMS)	(Average Rectified	(RMS)				
		Value)					

Comparison in details:

Note 1: The targeted device uses lithium battery for power supply which is the same as the predicate device, although the voltage of the two batteries are different, the lithium battery used in the targeted device has been tested according to IEC 62133, so this difference should not raise any problems.

Note 2: The number of output modes are defined by the manufacturer, although it's different from that of the predicate device, the output parameters are similar to that of the predicate device, so this difference should not raise safety and effectiveness problem.

Note 3: Although the appearance, weight and dimensions are different between the targeted and predicate device, these differences are insignificant and do not raise any problems.

Note 4: Although the parameter is different from that of the predicate device, the targeted device has passed IEC 60601-1 and IEC 60601-2-10, so this difference should not affect safety and effectiveness.

Conclusion:

Biofeedback Nerve and Muscle Stimulator is substantially equivalent to the predicate devices.

(9) Non-clinical studies and tests performed:

Non-clinical testings have been conducted to verify that the Biofeedback Nerve and Muscle Stimulator meets all design specifications which supports the conclusion that it's Substantially Equivalent (SE) to the predicate device. The testing results demonstrate that the targeted device complies with the following standards:

- ANSI AAMI ES 60601-1, Medical electrical equipment -- Part 1: General requirements for basic safety and essential performance
- IEC 60601-1-2, Medical electrical equipment Part 1-2: General requirements for basic safety and essential performance - Collateral standard: Electromagnetic disturbances - Requirements and tests
- IEC 60601-1-11, Medical electrical equipment -- Part 1-11: General requirements for basic safety and essential performance -- Collateral standard: Requirements for medical electrical equipment and medical electrical systems used in the home healthcare environment
- IEC 60601-2-10, Medical electrical equipment -- Part 2-10: Particular requirements for the basic safety and essential performance of nerve and muscle stimulators
- IEC 60601-2-40, Medical electrical equipment Part 2-40: Particular requirements for the basic safety and essential performance of electromyographs and evoked response equipment

The body-contacting components of this device are electrode patches and vaginal probe. For these components, FDA 510(k) clearance and test reports have been provided. So we have reason to believe that the electrode patches and vaginal probe are safe for the users. They comply with the following standards.

- ISO 10993-5, Biological Evaluation of Medical Devices -- Part 5: Tests for InVitro Cytotoxicity
- ISO 10993-10, Biological Evaluation of Medical Devices Part 10: Tests for Irritation and Skin Sensitization.

We have also conducted:

- Software verification and validation test according to the requirements of the FDA "Guidance for Pre Market Submissions and for Software Contained in Medical Devices"
- The waveform test report has also been conducted to verify the output specifications of the device according to Guidance Document for Powered Muscle Stimulator 510(k)s

(10) Conclusion

Based on the above analysis and tests performed, it can be concluded that the performance and function of Biofeedback Nerve and Muscle Stimulator are normal, it is Substantially Equivalent (SE) to the predicate device.