

April 1, 2022

Sonoscape Medical Corp. % Diana Hong General Manager Mid-Link Consulting Co., Ltd P.O.box 120-119 Shanghai, 200120 CHINA

Re: K211882

Trade/Device Name: HD-550 Video Endoscope System Regulation Number: 21 CFR 876.1500 Regulation Name: Endoscope and accessories Regulatory Class: Class II Product Code: NWB, FDF, FDS Dated: March 25, 2022 Received: March 29, 2022

Dear Diana Hong:

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,

Shanil P. Haugen, Ph.D.
Assistant Director
DHT3A: Division of Renal, Gastrointestinal, Obesity and Transplant Devices
OHT3: Office of GastroRenal, ObGyn, General Hospital and Urology Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number *(if known)* K211882

Device Name HD-550 Video Endoscope System

Indications for Use (Describe)

HD-550 Video Endoscope System

The HD-550 video endoscope system, which includes a video gastroscope /video colonoscope, image processor, light source, monitor, accessories and other peripheral devices, is intended for endoscopic examination, diagnosis and treatment of the upper and lower gastrointestinal tract.

EG-550 Series Video Gastroscope

The EG-550 Series Video Gastroscope has been designed to be used with the image processor, light source, monitor and other peripheral devices for endoscopic observation, diagnosis and treatment of the upper digestive tract (including the esophagus, stomach and duodenum).

EC-550 Series Video Colonoscope

The EC-550 Series Video Colonoscope has been designed to be used with the image processor, light source, monitor and other peripheral devices for endoscopic observation, diagnosis and treatment of the lower digestive tract (including the anus, rectum, colon and ileocecal segment).

HD-550 Series Image Processor

The HD-550 Series Image Processor has been designed to be used with the endoscope, light source, monitor and other peripheral devices for endoscopic observation, diagnosis, treatment, and video recording.

VLS-55 Series Light Source

The VLS-55 Series Light Source has been designed to be used with the endoscope, image processor and other peripheral devices for endoscopic observation, diagnosis and treatment.

| 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

This 510(k) Summary is being submitted in accordance with requirements of SMDA 1990 and Title 21, CFR Section 807.92.

The assigned 510(k) Number: K211882

- 1. Date of Preparation: 03/28/2022
- 2. Sponsor Identification

SONOSCAPE MEDICAL CORP.

Client Address: Room 201 & 202, 12 th Building, Shenzhen Software Park Phase II, 1 Keji Middle 2 nd Road, Yuehai Subdistrict, Nanshan District, Shenzhen, 518057, Guangdong, China Establishment Registration Number: 3004705634

Contact Person: Toki Wu Position: Regulatory Affairs Manager Tel: +86-755-26722890 Fax: +86-755-26722850 Email: ra@sonoscape.net

3. Designated Submission Correspondent

Ms. Diana Hong (Primary Contact Person) Ms. Jing Cheng (Alternative Contact Person)

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Tel: +86-21-22815850, Fax: 3609253199 Email: <u>info@mid-link.net</u>

4. Identification of Proposed Device

Trade Name: HD-550 Video Endoscope System Common Name: Endoscopic Video Imaging System Primary Components and Component Models:

| HD-550 Video Endoscope System | EG-550 Series Video Gastroscope | EG-550, EG-550L |
|----------------------------------|----------------------------------|-------------------------------|
| | EC-550 Series Video Colonoscope | EC-550, EC-550T, |
| | EC-550 Series video Cololioscope | EC-550L, EC-550L/T |
| | HD-550 Series Image Processor | HD-550Exp, HD-550, HD-550Pro, |
| | nD-550 Series image Processor | HD-550S, HD-510, HD-500Plus |
| | VLS-55 Series Light Source | VLS-55Q, VLS-55T, |
| | v Lo-55 Series Light Source | VLS-51T, VLS-51D |

Regulatory Information

Classification Name: Endoscope and accessories Classification: II Product Code: NWB, FDF and FDS Regulation Number: 21 CFR 876.1500 Review Panel: Gastroenterology/Urology

Indications for Use:

HD-550 Video Endoscope System

The HD-550 video endoscope system, which includes a video gastroscope /video colonoscope, image processor, light source, monitor, accessories and other peripheral devices, is intended for endoscopic examination, diagnosis and treatment of the upper and lower gastrointestinal tract.

EG-550 Series Video Gastroscope

The EG-550 Series Video Gastroscope has been designed to be used with the image processor, light source, monitor and other peripheral devices for endoscopic observation, diagnosis and treatment of the upper digestive tract (including the esophagus, stomach and duodenum).

EC-550 Series Video Colonoscope

The EC-550 Series Video Colonoscope has been designed to be used with the image processor, light source, monitor and other peripheral devices for endoscopic observation, diagnosis and treatment of the lower digestive tract (including the anus, rectum, colon and ileocecal segment).

HD-550 Series Image Processor

The HD-550 Series Image Processor has been designed to be used with the endoscope, light source, monitor and other peripheral devices for endoscopic observation, diagnosis, treatment, and video recording.

VLS-55 Series Light Source

The VLS-55 Series Light Source has been designed to be used with the endoscope, image processor and other peripheral devices for endoscopic observation, diagnosis and treatment.

5. Device Description

The proposed device, HD-550 Video Endoscope System, which includes a video gastroscope /video colonoscope, image processor, light source, monitor, accessories and other peripheral devices.

HD-550 Video Endoscope System can be offered in several configurations with the options of different models of primary components

The EG-550 Series Video Gastroscope/ EC-550 Series Video Colonoscope is the hand-held, direct-viewing flexible endoscope used for endoscopy and endoscopic surgery within the upper and lower gastrointestinal tract.

The HD-550 Series Image Processor is a video processing system which is designed to be used with endoscopes, light source, monitor of the proposed system. Apart from the image processing functions, it also provides power supply for the endoscopes.

The VLS-55 Series Light Source provides illumination for endoscopic diagnosis, treatment and video observation.

6. Identification of Predicate Device

510(k) Number: K173921

Product Name: HD-500 Video Endoscope System.

Primary Components and Component Models:

| EG-500 Series Video Gastroscope | EG-500, EG-500L |
|---------------------------------|-------------------------------------|
| EC-500 Series Video Colonoscope | EC-500, EC-500T, EC-500L, EC-500L/T |
| HD-500 Series Image Processor | HD-500, HD-500S, HD-330Plus |
| HDL-500 Series Light Source | HDL-500E, HDL-500X |

7. Non-Clinical Test Conclusion

Non clinical tests were conducted to verify that the proposed device met all design specifications as was Substantially Equivalent (SE) to the predicate device. The test results demonstrated that the proposed device complies with the following standards:

- IEC 60601-1-2005+CORR.1:2006+CORR.2:2007+A1:2012, Medical Electrical Equipment- Part 1: General requirements for basic safety and essential performance, including the US National Differences
- IEC 60601-1-2:2007, Medical electrical equipment- Part 1-2: General requirements for basic safety and essential performance- Collateral standard: Electromagnetic compatibility- Requirements and tests
- IEC 60601-2-18:2009, Medical electrical equipment Part 2-18: Particular requirements for the basic safety and essential performance of endoscopic equipment
- ISO 8600-1:2015 Endoscopes--Medical endoscopes and endotherapy devices part 1: General requirements
- ISO 8600-7:2012 Endoscopes --Medical endoscopes and endotherapy devices part 7: Basic requirements for medical endoscopes of water-resistant type
- > ISO 10993-5:2009 Biological evaluation of medical devices Part 5: Tests for in vitro cytotoxicity
- ISO 10993-10:2010 Biological evaluation of medical devices Part 10: Tests for irritation and skin sensitization

Optical performance testing

The following testing was conducted to evaluate the optical performance characteristics for each endoscopic system mode.

- Photobiological safety
- > Color Reproduction (test results comparison between the proposed device and predicate device)
- Resolution (test results comparison between the proposed device and predicate device)
- > Depth of field (test results comparison between the proposed device and predicate device)
- Optical magnification and distortion (test results comparison between the proposed device and predicate device)
- Image intensity uniformity (test results comparison between the proposed device and predicate device)

Physical/functional performance testing

The endoscope performance test was conducted to evaluate the ability of proposed endoscope to maintain the maximum angulation/deflection when in use, the physical/functional performance of the proposed device, including a) Appearance visual inspection and handle strength inspection, b) Image function visual inspection, c) Sealing performance, and d) Maximum bending angle measurement and body model testing.

Imaging performance testing

The imaging performance testing was conducted to demonstrate that the imaging quality of the proposed device is still in a better condition when the device is over its lifetime of clinical use. The degradations of imaging performance are very little which will not affect the normal use of the endoscope.

8. Clinical Test Conclusion

No clinical study is included in this submission.

9. Substantially Equivalent (SE) Comparison

The whole system and components of the proposed device is basically identical to its predicate device in indication for use, and similar in specification. Comparisons between the proposed device and predicate device are shown in Table 1 to Table 6.

| | | <u>^</u> | | |
|------------------------|--|--|--|--|
| ITEM | Proposed Device | Predicate Device | | |
| TIENT | | K173921 | | |
| Product Code | NWB, FDF and FDS | NWB, FDF and FDS | | |
| Regulation Number | 21 CFR 876.1500 | 21 CFR 876.1500 | | |
| Class | II | П | | |
| | HD-550 Video Endoscope System The HD-550 video endoscope system, which includes a video gastroscope /video colonoscope, image processor, light source, monitor, accessories and other peripheral devices, is intended for endoscopic examination, diagnosis and treatment of the upper and lower gastrointestinal tract. | HD-500 Video Endoscope System The HD-500 Video Endoscope System, which includes a video gastroscope /video colonoscope, image processor, light source, monitor, accessories and other peripheral devices, is intended for endoscopies examination, diagnosis and treatment of the disease of the upper and lower gastrointestinal tract. | | |
| Indications for Use | <u>VLS-55 Series Light Source</u> . The VLS-55 Series Light Source has been designed to be used with the endoscope, image processor and other peripheral devices for endoscopic observation, diagnosis and treatment. | HDL-500SeriesLightSource,HDL-500E, HDL-500XThe HDL-500 SeriesLightSource hasbeendesignedtobeusedwiththeendoscope, imageprocessorand otherperipheraldevicesforendoscopicobservation, diagnosisand treatment. | | |
| | <u>HD-550 Series Image Processor</u> , The HD-550 Series Image Processor has been designed to be used with the endoscope, light source, monitor and other peripheral devices for endoscopic observation, diagnosis, treatment, and | HD-500SeriesImageProcessor,HD-500, HD-500S, HD-330PlusThe HD-500SeriesImageProcessorhas been designed to be used with theendoscope, light source, monitor andother peripheral devices for endoscopic | | |

Table 1 General Comparison

| | • 1 1. | 1 1 |
|---------------|--|--|
| | video recording. | observation, diagnosis, treatment, and |
| | | video recording. |
| | EG-550 Series Video Gastroscope | EG-500 Series Video Gastroscope, |
| | The EG-550 Series Video Gastroscope | <u>EG-500, EG-500L</u> |
| | has been designed to be used with the | The EG-500 Series Video Gastroscope |
| | image processor, light source, monitor | has been designed to be used with the |
| | and other peripheral devices for | image processor, light source, monitor |
| | endoscopic observation, diagnosis and | and other peripheral devices for |
| | treatment of the upper digestive tract | endoscopic observation, diagnosis and |
| | (including the esophagus, stomach and | treatment of the upper digestive tract |
| | duodenum). | (including the esophagus, stomach and |
| | | duodenum). |
| | EC-550 Series Video Colonoscope | EC-500 Series Video Colonoscope, |
| | The EC-550 Series Video Colonoscope | EC-500, EC-500T, EC-500L, |
| | has been designed to be used with the | <u>EC-500L/T</u> |
| | image processor, light source, monitor | The EC-500 Series Video Colonoscope |
| | and other peripheral devices for | has been designed to be used with the |
| | endoscopic observation, diagnosis and | image processor, light source, monitor |
| | treatment of the lower digestive tract | and other peripheral devices for |
| | (including the anus, rectum, colon and | endoscopic observation, diagnosis and |
| | ileocecal segment). | treatment of the lower digestive tract |
| | | (including the anus, rectum, colon and |
| | | ileocecal segment) |
| | Light Source | Light Source |
| Configuration | Image processor | Image processor |
| (primary | Video Gastroscope | Video Gastroscope |
| components) | Video Colonoscope | Video Colonoscope |
| | Accessories and peripheral devices | Accessories and peripheral devices |

| ITEM | | | Duon and Davia | - | | | | | Predicate Device | |
|---------------|-------------------------------|------|-----------------|---|--------------------|------------------|--|---------------------------------|------------------------|--|
| HEM | | | Proposed Device | | | | | K173921 | | |
| Model | | | HD-550Exp | HD-550 | HD-550Pro | HD-550S | HD-510 | HD-500Plus | HD-500 | |
| Power supply | , | | | | 100-240V AC | , 50/60Hz | | | 100-240V AC, 50/60Hz | |
| Over-current | protection | | | | Fuse ty | pe | | | Fuse type | |
| Size | | | 370(W)×124(H) |)×500(D)mm | 370(W)×124(| H)×500(D)mm | 370(W)×124(| (H)×500(D)mm | 370(W)×124(H)×455(D)mm | |
| Weight | | | 11.1 Kg | | 11.1 Kg | | 11.1 Kg | | 9.5 Kg | |
| compatible en | ndoscope | | | | Videosc | ope | | | Videoscope | |
| | Video sign output | nal | | DVI (high definition) VGA (high definition) SDI (high definition) CVBS (standard definition) S-Video (standard definition) | | | | DVI VGA SDI VBS Y/C | | |
| Observation | Auto wl balance | hite | 5 | Automatically adjusted using the white balance switch. At the time of connection with the scope n which the scope ID is provide, compensation is performed automatically | | | Automatically adjusted using the white balance switch. At the time of connection with the scope in which the scope ID is provide, compensation is performed automatically | | | |
| | Standard color c output | har | | Color bar image | | | | Color bar image | | |
| | color t | one | | Red: ±15 s | teps, Blue: ±15 st | teps, chroma: ±1 | 5 steps | | R:±8 steps B:±8 steps | |

Table 2 Specifications Comparison of Image Processor

| | adjustment | | chroma:±8 steps |
|---------------|--------------|--|------------------------|
| | automatic | Provided | Provided |
| | gain control | | |
| | | Edge enhancement | Edge enhancement |
| | Turner | Structure enhancement: | Structure enhancement: |
| | Image | Contrast enhancement | Contrast enhancement |
| | enhancement | Color enhancement: | Color enhancement: |
| | | | |
| | IRIS mode | Deels/AVE/Auto shotometre mode | Peak/AVE/Auto |
| | selection | Peak/AVE/Auto photometry mode | photometry mode |
| | Zoom | 1.0 - 4.0 | ×1.4 /×1.6/×1.8 |
| | Imaging | White light (WL) imaging mode, Enhanced white light (EWL) imaging mode, Spectral focused | WL imaging mode, |
| | modes | (SFI mode) imaging mode and Intelligent staining technology mode (VIST mode)NOTE | VIST observation mode |
| Foot switch c | onnector | Provided | Provided |
| record to mer | nory card | Provided | Provided |

NOTE:

The prospective clinical value of the enhanced imaging modes has not been demonstrated, and no clinical claims are made.

Ref.: M10202020

| Table 3 Specifications Comparison of Video Gastroscope | | | | | | | |
|--|-----------------|------------|------------|------------|--------|--|--|
| ITEM | Proposed device | | Predic | ate device | Remark | | |
| Model | EG-550 | EG-550L | EG-500 | EG-500L | / | | |
| Field of view | 140° | 140° | 140° | 140° | SE | | |
| Depth of | 3-100mm | 3-100mm | 3-100mm | 3-100mm | SE | | |
| focus | | | | | | | |
| Front view | 0° | 0° | 0° | 0° | SE | | |
| Sensor type | color CMOS | color CMOS | color CMOS | color CMOS | SE | | |
| Distal end | 9.3mm | 9.8mm | 9.3mm | 9.8mm | SE | | |
| outer | | | | | | | |
| diameter | | | | | | | |
| Insertion | 9.3mm | 9.8mm | 9.3mm | 9.8mm | SE | | |
| section outer | | | | | | | |
| diameter | | | | | | | |
| Bend angle | UP:210° | UP:210° | UP:210° | UP:210° | SE | | |
| | DOWN:90° | DOWN:90° | DOWN:90° | DOWN:90° | | | |
| | RIGHT:100° | RIGHT:100° | RIGHT:100° | RIGHT:100° | | | |
| | LEFT:100° | LEFT:100° | LEFT:100° | LEFT:100° | | | |
| Insertion | 1050mm | 1050mm | 1050mm | 1050mm | SE | | |
| section length | | | | | | | |
| Total length | 1400mm | 1400mm | 1400mm | 1400mm | SE | | |
| Biopsy | 2.8mm | 3.2mm | 2.8mm | 3.2mm | SE | | |
| channel inner | | | | | | | |
| diameter | | | | | | | |

Table 3 Specifications Comparison of Video Gastroscope

| Interference Interference ITEM Proposed device Predicate | | | | | | |
|--|------------|------------|------------|------------|------------|----------|
| IICIVI | | riopose | | | device | Remark |
| Model | EC-550 | EC-550T | EC-550L | EC-550L/T | EC-500 | / |
| Field of | 140° | 140° | 140° | 140° | 140° | SE |
| | 140 | 140* | 140* | 140* | 140* | SE |
| view | 2 100 | 2.100 | 2 100 | 2 100 | 2 100 | OF. |
| Depth of | 3-100mm | 3-100mm | 3-100mm | 3-100mm | 3-100mm | SE |
| focus | 0° | 0° | 0° | 0° | 0° | 0E |
| Front | 0° | 00 | 00 | 0° | 0° | SE |
| view | 1 | 1 | 1 | 1 | 1 01400 | |
| Sensor | color CMOS | SE |
| type | | | | | | |
| Distal | 12mm | 12mm | 12.9mm | 12.9mm | 12mm | SE |
| end | | | | | | analysis |
| outer | | | | | | 6 |
| diameter | | | | | | |
| Insert | 12.5mm | 12.5mm | 12.9mm | 12.9mm | 12.5mm | SE |
| section | | | | | | analysis |
| outer | | | | | | 6 |
| diameter | | | | | | |
| Bend | UP:180° | UP:180° | UP:180° | UP:180° | UP:180° | SE |
| angle | DOWN:180° | DOWN:180° | DOWN:180° | DOWN:180° | DOWN:180° | |
| | RIGHT:160° | RIGHT:160° | RIGHT:160° | RIGHT:160° | RIGHT:160° | |
| | LEFT:160°" | LEFT:160° | LEFT:160° | LEFT:160° | LEFT:160° | |
| Insertion | 1350mm | 1700mm | 1350mm | 1700mm | 1350mm | SE |
| section | | | | | | analysis |
| length | | | | | | 7 |
| Total | 1700mm | 2050mm | 1700mm | 2050mm | 1700mm | SE |
| length | | | | | | analysis |
| _ | | | | | | 7 |
| Biopsy | ≥ 3.8mm | ≥ 3.8mm | ≥ 4.2mm | ≥ 4.2mm | 3.8mm | SE |
| channel | | | | | | analysis |
| inner | | | | | | 6 |
| diameter | | | | | | |

| Table 4 Specifications | Comparison | of Video | Colonoscope |
|-------------------------|------------|----------|-------------|
| Tueste : speetineutiens | 001110011 | 01 11400 | concloseope |

| Tuble o Specifications comparison of Eight Source | | | | | | |
|---|----------------------|----------------------|---------------|--|--|--|
| ITEM | VLS-55 Series Light | HDL-500E Light | Remark | | | |
| | Source | Source | Kelliark | | | |
| Derror granter | AC 100-240V | AC 100-240V | <u>ee</u> | | | |
| Power supply | 50Hz/60Hz | 50Hz/60Hz | SE | | | |
| Over-current protection | Fuse type | Fuse type | SE | | | |
| Input current | 300VA | 160VA | SE Analysis 8 | | | |
| Examination lamp | 50W LED | 50W LED | SE | | | |
| Average lamp life | 50000 hours | 50000 hours | SE | | | |
| Emergency lamp | 14W LED | 14W LED | SE | | | |
| Average emergency lamp life | 50000 hours | 50000 hours | SE | | | |
| Brightness control | Automatic and manual | Automatic and manual | SE | | | |
| Automatic exposure | 19 steps | 19 steps | SE | | | |
| System connector | Provided | Provided | SE | | | |
| Foot switch connector | Provided | Provided | SE | | | |
| CV connector | Provided | Provided | SE | | | |

Table 5 Specifications Comparison of Light Source

Table 6 Safety Comparison

| ITEM | Proposed Device | 3 | Predicate De | Remark | |
|--|--------------------------------|--------------------------------------|-----------------------------|---|----|
| | - | Endoscope System | K173921 | | |
| | 1 2 | | HD-500 Video Endoscope | | |
| | | | System | 1 | |
| Electrical Safety | Comply with IE | C 60601-1 | Comply with | IEC 60601-1 | SE |
| EMC | Comply with IE | C 60601-1-2 | Comply with | IEC 60601-1-2 | SE |
| Particular requirements | Comply with IEC 60601-2-18 | | Comply with | IEC 60601-2-18 | SE |
| Product | Comply with ISO 8600-1 and ISO | | Comply with | Comply with ISO 8600-1 and | |
| Performance | 8600-7 | | ISO 8600-7 | | |
| | Insertion | PU, | Insertion | PU, | SE |
| | section | fluoroelastomer | section | fluoroelastomer | |
| Patient-contact component and material | Distal end | PEEK, Sapphire crystal SUS 304 | Distal end | PEEK, Sapphire crystal SUS 304 | |
| | Adhesive | Epoxy resin | Adhesive | Epoxy resin | |
| | Cytotoxicity, IS | O 10993-5 | Cytotoxicity, ISO 10993-5 | | SE |
| Biocompatibility | Sensitization, IS | O 10993-10 | Sensitization, ISO 10993-10 | | |
| | Irritation, ISO 1 | 0993-10 | Irritation, IS | O 10993-10 | |

10. Substantially Equivalent (SE) Conclusion

Based on the comparison and analysis in section 9 and the side-by-side optical performance tests, the proposed device and the predicate device have the same intended use, comparable product specification and optical performance. Therefore, the proposed device is determined to be Substantially Equivalent (SE) to the predicate device.