



August 21, 2023

Meditrina, Inc.  
Csaba Truckai  
President & CEO  
1190 Saratoga Avenue, Suite 180  
San Jose, CA 95129

Re: K223813  
Trade/Device Name: Aveta System 2.0  
Regulation Number: 21 CFR§ 884.1690  
Regulation Name: Hysteroscope and Accessories  
Regulatory Class: II  
Product Code: HIH, HIG, FAJ  
Dated: July 28, 2023  
Received: July 31, 2023

Dear Csaba Truckai:

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](mailto:DICE@fda.hhs.gov)) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

  
**Jason Roberts -S**

Jason R. Roberts, Ph.D.

Assistant Director

DHT3B: Division of Reproductive,  
Gynecology and Urology 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)  
K223813

Device Name  
Aveta System 2.0

### Indications for Use (Describe)

AVETA SYSTEM 2.0:

USING BIPOLAR RF DEVICE:

-Hysteroscopy:

Aveta System 2.0 for Hysteroscopy: The Aveta System 2.0 is intended for intrauterine use by trained gynecologists to permit viewing of the cervical canal and the uterine cavity, provide liquid distension of the uterus and monitor the volume differential between the irrigation fluid flowing into and out of the uterus during diagnostic and surgical procedures to resect, remove and coagulate tissue such as submucous myomas, endometrial polyps, adhesions and retained products of conception using a bipolar resecting device.

USING MECHANICAL RESECTING DEVICES:

-Hysteroscopy:

The Aveta System 2.0 is intended for intrauterine use by trained gynecologists to permit viewing of the cervical canal and the uterine cavity, provide liquid distension of the uterus and monitor the volume differential between the irrigation fluid flowing into and out of the uterus during diagnostic and surgical procedures to resect and remove tissue such as submucous myomas, endometrial polyps and retained products of conception.

-Cystoscopy:

The Aveta System 2.0 is intended for use in endoscopic access to and examination of the lower urinary tract, including the bladder. When combined with accessory instruments, the system allows the user to perform various diagnostic and therapeutic procedures.

AVETA DISPOSABLE HYSTEROSCOPE (Pearl/Opal/Coral):

The Aveta Disposable Hysteroscope (Pearl/Opal/Coral) is intended to permit viewing of the cervical canal and the uterine cavity for the purpose of performing diagnostic and surgical procedures.

AVETA DISPOSABLE CYSTOSCOPE (Coral):

The Aveta Disposable Cystoscope (Coral) is intended for use in endoscopic access to and examination of the lower urinary tract, including the bladder. When combined with accessory instruments, the Cystoscope allows the user to perform various diagnostic and therapeutic procedures.

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.”*

**K223813**      **510(k) Summary****I. Submitter Information**

|                        |  |
|------------------------|--|
| <b>Submitter name:</b> | Meditrina, Inc.<br>1190 Saratoga Avenue, Suite 180<br>San Jose, CA 95129   |
| <b>Contact person:</b> | Csaba Truckai<br>President & CEO<br><b>Email:</b> <a href="mailto:csabat@hermesinnovations.com">csabat@hermesinnovations.com</a><br><b>Phone:</b> 415-215-7233<br><b>Fax:</b> 408-418-4815 |
| <b>Date Prepared:</b>  | 16 August 2023   |

**II. Product Classification**

|                                  |   |                |
|----------------------------------|---|----------------|
| <b>Device Name:</b>              | Aveta System 2.0  |                |
| <b>Common Name:</b>              | Hysteroscope  | Subject Device |
| <b>Regulation:</b>               | 21 CFR 884.1690   |                |
| <b>Regulation Name:</b>          | Hysteroscope and accessories;<br>Hysteroscopic insufflator<br>Endoscope and accessories |                |
| <b>Class:</b>                    | II  |                |
| <b>Product Code:</b>             | HIH   |                |
| <b>Additional Product Codes:</b> | HIG, FAJ  |                |

**III. Predicate Device Information**

| Predicate Devices                               | Manufacturer    | Predicate Device Names  | 510(k)# | Clearance Date   |
|---|-----------------|---|---------|------------------|
| <b>Predicate #1<br/>(PRIMARY<br/>PREDICATE)</b> | Meditrina, Inc. | Aveta System, Aveta Disposable Hysteroscope (Pearl/Opal/Coral), Aveta Disposable Cystoscope (Coral) | K213171 | May 26, 2022     |
| <b>Predicate #2<br/>(Secondary Predicate)</b>   | Gynecare, Inc.  | Scuba (Gynecare Versapoint) System  | K962482 | November 1, 1996 |

Predicate has not been a subject of a design related recall.

**IV. Device Description**

The Aveta System 2.0 is an integrated system which allows for visualization of the intended cavity for the purpose of performing diagnostic and operative procedures (hysteroscopy and cystoscopy). The Aveta System consists of the components listed in **Table 1**. The system includes a Controller 2.0 with integrated fluid management which incorporates a dual peristaltic pump design to control the continuous inflow and outflow of saline to provide fluid distention of the cavity. Controller 2.0 provides continuous monitoring of the cavity pressure to the set pressure. For hysteroscopy, it also monitors the volume differential between saline inflow and outflow from the uterus (fluid deficit). Controller 2.0 connects to a sterile,

single use disposable Scope (available in various configurations, see below) that allows visualization of the cavity and displays the images obtained from the Scope on a standard monitor. The Controller 2.0 provides bipolar Radiofrequency (RF) energy to deliver to the Aveta Glo Disposable RF Device for CUT and COAG functions. For operative hysteroscopy procedures, the Aveta System also includes sterile, mechanical Disposable Resecting Device (available in various configurations, see below) powered by an integrated motor in the device handset. The resecting device (RF or mechanical) is inserted through the working channel of the sterile hysteroscope to resect the target tissue/pathology. For cystoscopy, when combined with accessory instruments the cystoscope is used for diagnostic and therapeutic procedures.

**Table 1. Aveta System 2.0 Components and their Functions**

| Aveta System 2.0 Component   | Functions Performed   |
|--|---|
| Aveta Controller 2.0 and Footswitch (includes single pedal or dual pedal footswitch)   | <ul style="list-style-type: none"> <li>• Displays image/video and procedural information on external monitor.</li> <li>• Image / video processing / storing of the images.</li> <li>• Enables visualization functions of the Hysteroscope / Cystoscope.</li> <li>• Fluid Management with irrigation and aspiration functions.</li> <li>• Controls saline inflow and outflow for distention of the uterine cavity or lower urinary tract with the bladder for visualization.</li> <li>• Monitors and maintains intrauterine pressure or lower urinary tract cavity pressure to set pressure.</li> <li>• Monitors volume differential (fluid deficit for hysteroscopy).</li> <li>• Provides ON/OFF function of the Resecting Device.</li> <li>• Provides power to the Disposable Resecting Devices for oscillation at a preset speed for mechanical resection function of Disposable Resecting Device.</li> <li>• Provides power to the Drape Pump.</li> <li>• Provides bi-polar RF energy to the tissue via the GLO Disposable RF Device.</li> </ul> |
| Aveta Disposable Hysteroscope (Coral, Pearl and Opal) and Aveta Coral Disposable Cystoscope<br><br>Collectively, they are called Aveta Disposable Scope or just Scope or Endoscope.  | <ul style="list-style-type: none"> <li>• Hysteroscope: Visualization of cervical canal and uterine cavity</li> <li>• Cystoscope: Visualization of the lower urinary tract including the bladder</li> <li>• Provides conduits/lumens for fluid inflow and outflow</li> <li>• Provides conduit (working channel) for operative instruments for operative procedures</li> <li>• For Coral and Pearl hysteroscopes, provides user interface for intrauterine or urethral cavity set pressure and fluid deficit limit adjustments (for hysteroscopy), flush, and recording of images.</li> </ul>   |
| Aveta Fluid Management Accessory   | <ul style="list-style-type: none"> <li>• Provides membrane in fluid inflow line to enable intrauterine or urethral cavity pressure monitoring/control using pressure transducer in Controller</li> <li>• Provides conduits for irrigation of saline and aspiration of waste.</li> <li>• Provides FMA Cassette with tubing for peristaltic pump functions of Aveta Controller 2.0.</li> </ul>  |
| Aveta Disposable Resecting Devices (DRDH-Wave+, DRDH-Flex, DRDH-Smol, DRDH-AUTO and DRDH-AUTO-5Fr)   | <ul style="list-style-type: none"> <li>• Mechanically resects and removes tissue under suction <ul style="list-style-type: none"> <li>○ DRDH-Wave+, DRDH-Flex, DRDH-Smol, AUTO and AUTO-5Fr includes motor in the device handle to oscillate resection tip for the DRDHs and to rotate the resection tip for Auto and Auto-5Fr.</li> <li>○ The motor in the device handle for AUTO and AUTO-5Fr also provides suction by peristaltic action and are only for use with the pressurized saline bag.</li> </ul> </li> </ul>  |
| Aveta Glo Disposable RF Device, 7Fr.   | <ul style="list-style-type: none"> <li>• Performs bipolar resection (RF CUT) and removes tissue under suction and coagulates (RF COAG) tissue to reduce or eliminate bleeding and improve visibility.</li> </ul>  |
| Additional Aveta System Components / Accessories <ul style="list-style-type: none"> <li>• Waste Management Accessory</li> <li>• Waste Bag (6L)</li> <li>• Roll Stand with Drape Pump</li> <li>• Monitor</li> <li>• Reusable Cable, Opal</li> </ul> | <ul style="list-style-type: none"> <li>• Collects tissue for pathology, stores the outflow fluid waste, collects fluid from the patient's under-buttocks drape</li> <li>• Part of Waste Management Accessory</li> <li>• Roll Stand mounts the monitor and Controller for the system<br/>Drape Pump transfers collected waste fluid from drape to Waste Bag</li> <li>• Commercially available surgical monitor. Displays image, procedural parameters, and notifications</li> <li>• Connects the Opal Hysteroscope to the Controller</li> </ul>  |

**V. Indications for Use**

There is no difference in the indications for use for the Aveta System 2.0 (subject device) when compared to the indications of the predicate devices.

**Comparison of Indications for Use**

| Device   | Indications For Use  |
|--|--|
| <p><b>Aveta System 2.0 (Subject Device)</b></p>                        | <p>AVETA SYSTEM 2.0:<br/>USING BIPOLAR RF DEVICE:<br/>-Hysteroscopy:<br/>Aveta System 2.0 for Hysteroscopy: The Aveta System 2.0 is intended for intrauterine use by trained gynecologists to permit viewing of the cervical canal and the uterine cavity, provide liquid distension of the uterus and monitor the volume differential between the irrigation fluid flowing into and out of the uterus during diagnostic and surgical procedures to resect, remove and coagulate tissue such as submucous myomas, endometrial polyps, adhesions and retained products of conception using a bipolar resecting device.<br/>USING MECHANICAL RESECTING DEVICES:<br/>-Hysteroscopy:<br/>The Aveta System 2.0 is intended for intrauterine use by trained gynecologists to permit viewing of the cervical canal and the uterine cavity, provide liquid distension of the uterus and monitor the volume differential between the irrigation fluid flowing into and out of the uterus during diagnostic and surgical procedures to resect and remove tissue such as submucous myomas, endometrial polyps and retained products of conception.<br/>-Cystoscopy:<br/>The Aveta System 2.0 is intended for use in endoscopic access to and examination of the lower urinary tract, including the bladder. When combined with accessory instruments, the system allows the user to perform various diagnostic and therapeutic procedures.</p> <p>AVETA DISPOSABLE HYSTEROSCOPE (Pearl/Opal/Coral):<br/>The Aveta Disposable Hysteroscope (Pearl/Opal/Coral) is intended to permit viewing of the cervical canal and the uterine cavity for the purpose of performing diagnostic and surgical procedures.</p> <p>AVETA DISPOSABLE CYSTOSCOPE (Coral):<br/>The Aveta Disposable Cystoscope (Coral) is intended for use in endoscopic access to and examination of the lower urinary tract, including the bladder. When combined with accessory instruments, the Cystoscope allows the user to perform various diagnostic and therapeutic procedures.</p> |
| <p><b>Aveta System (Predicate Device #1)</b></p>                       | <p>AVETA SYSTEM:<br/>Hysteroscopy:<br/>The Aveta System is intended for intrauterine use by trained gynecologists to permit viewing of the cervical canal and the uterine cavity, provide liquid distension of the uterus and monitor the volume differential between the irrigation fluid flowing into and out of the uterus during diagnostic and surgical procedures to resect and remove tissue such as submucous myomas, endometrial polyps and retained products of conception.</p> <p>Cystoscopy:<br/>The Aveta System is intended for use in endoscopic access to and examination of the lower urinary tract, including the bladder. When combined with accessory instruments, the system allows the user to perform various diagnostic and therapeutic procedures.</p> <p>AVETA DISPOSABLE HYSTEROSCOPE (Pearl/Opal/Coral):<br/>The Aveta Disposable Hysteroscope (Pearl/Opal/Coral) is intended to permit viewing of the cervical canal and the uterine cavity for the purpose of performing diagnostic and surgical procedures.</p> <p>AVETA DISPOSABLE CYSTOSCOPE (Coral):<br/>The Aveta Disposable Cystoscope (Coral) is intended for use in endoscopic access to and examination of the lower urinary tract, including the bladder. When combined with accessory instruments, the Cystoscope allows the user to perform various diagnostic and therapeutic procedures.</p>   |
| <p><b>Scuba (Gynecare Versapoint) System (Predicate Device #2)</b></p> | <p>The Scuba (Gynecare Versapoint) System is intended for tissue cutting, vaporization and desiccation as required or encountered in gynecologic hysteroscopic electrosurgical procedures for excision of intrauterine myomas and polyps, lysis of intrauterine adhesions, and excision of uterine septa.</p>  |

The indications for use for the subject Aveta System 2.0 is similar to the indications for use for primary Predicate #1 (Aveta System) and Predicate #2 (Scuba (Gynecare Versapoint) System)).

**VI. Comparison of Technological Characteristics with the Predicate Device**

Aveta System 2.0 and the predicate system have the same or similar technological characteristics in terms of basic operating principle and basic design features with minor differences.

**Technological Comparison of Aveta System 2.0 with Predicate Devices**

|   | Subject Device  | PREDICATE #1<br>Primary Predicate   | PREDICATE #2<br>Secondary Predicate |
|---|---|---|-------------------------------------|
| 510k#   | K223813   | K213171   | K962482                             |
| Manufacturer:   | Meditrina Inc.  | Meditrina Inc.  | Gynecare, Inc.                      |
| Device Names  | Aveta System 2.0  | Aveta System<br>Aveta Hysteroscope<br>Aveta Cystoscope  | Scuba (Gynecare Versapoint) System  |
| <b>CONTROLLER FUNCTIONS</b>                             |   |   |                                     |
| <b>Hysteroscope /Cystoscope Functions</b>               |   |   |                                     |
| <b>Visualization and Image Processing</b>               | CMOS sensor, and light source in Endoscope with image processing by the Controller  | CMOS sensor, and light source in Endoscope with image processing by the Controller  | N/A                                 |
| <b>Viewing Functions</b>                                | Controller connects to a commercially available external Monitor and displays image from the cavity, plays tone, displays cavity pressure, fluid deficit with graphical user interface. | Controller connects to a commercially available external Monitor and displays image from the cavity, plays tone, displays cavity pressure, fluid deficit with graphical user interface. | NA                                  |
| <b>Fluid Management Functions</b>                       |   |   |                                     |
| <b>Fluid Distension</b>                                 | Continuous flow of saline/fluid   | Continuous flow of saline/fluid   | NA                                  |
| <b>Irrigation for Distension</b>                        | Peristaltic pump with dual pressure sensors for irrigation of fluids  | Peristaltic pump with dual pressure sensors for irrigation of fluids  | NA                                  |
| <b>Aspiration of bodily fluids and tissue</b>           | Integrated Peristaltic pump for aspiration.   | Integrated Peristaltic pump for aspiration.   | NA                                  |
| <b>Intrauterine Pressure Measurements</b>               | Obtains two independent, intrauterine pressure measurement by sensing pressure of the irrigation tube   | Obtains two independent, intrauterine pressure measurement by sensing pressure of the irrigation tube   | NA                                  |
| <b>Set Pressure Range</b>                               | Hysteroscopy:<br>30-120 mmHg<br>Cystoscopy:<br>30-60mmHg  | Hysteroscopy:<br>30-120 mmHg<br>Cystoscopy:<br>30-60mmHg  | NA                                  |
| <b>Set Pressure User Adjustments</b>                    | Allows user to increase/decrease the set pressure   | Allows user to increase/decrease the set pressure   | NA                                  |
| <b>Pressure Relief for overpressure risk mitigation</b> | <u>Hysteroscopy:</u><br>Reverse rotation of irrigation peristaltic pump at 150mmHg<br><u>Cystoscopy:</u><br>Reverse rotation of irrigation peristaltic pump at 75mmHg                   | <u>Hysteroscopy:</u><br>Reverse rotation of irrigation peristaltic pump at 150mmHg<br><u>Cystoscopy:</u><br>Reverse rotation of irrigation peristaltic pump at 75mmHg                   | NA                                  |
| <b>Fluid Deficit Measurement</b>                        | YES   | YES   | NA                                  |
| <b>Flow Rate</b>  | 180-500 mL/min preset fixed flow rates  | 180-500 mL/min preset fixed flow rates  | NA                                  |



|   | Subject Device  | PREDICATE #1<br>Primary Predicate   | PREDICATE #2<br>Secondary Predicate  |
|---|---|---|--|
| 510k#   | K223813   | K213171   | K962482  |
| Manufacturer:   | Meditrina Inc.  | Meditrina Inc.  | Gynecare, Inc.   |
| Device Names  | Aveta System 2.0  | Aveta System<br>Aveta Hysteroscope<br>Aveta Cystoscope  | Scuba (Gynecare Versapoint) System   |
| <b>Resection Functions</b>  |   |   |  |
| Mechanical Resecting Device   | Connects to the Controller 2.0 by an electrical connection to provide motor control with a preset fixed motor rotation/oscillation speed. | Connects to the Controller by an electrical connection to provide motor control with a preset fixed motor rotation/oscillation speed. | N/A  |
| Bipolar RF Device   | Cut and Coagulate tissue when active electrode is extended and powered by controller, only when activated by the dual footswitch          | NA  | Cut and Coagulate Uterine tissue when active electrode is extended and powered by controller                                   |
| RF CUT, COAG Power Waveform and frequency   | Bipolar<br>CUT 110 W @ 150Ω<br>COAG 55W @ 150Ω<br>quasi sinusoidal waveform<br>205 kHz  | N/A   | Bipolar<br>CUT 200W @ 160Ω<br>COAG 125W @ 160Ω<br>variable amplitude sinusoid waveform<br>varying between<br>340kHz and 450kHz |
| <b>DISPOSABLE HYSTEROSCOPE/CYSTOSCOPE</b>   |   |   |  |
| Irrigation and Aspiration Lumens  | Independent sterile saline irrigation and aspiration lumens   | Independent sterile saline irrigation and aspiration lumens   | NA   |
| Insertion OD  | Pearl Hysteroscope: 5.7mm<br>Coral Hysteroscope: 4.6mm<br>Opal Hysteroscope: 4.6mm<br>Coral Cystoscope: 4.6mm                             | Pearl Hysteroscope: 5.7mm<br>Coral Hysteroscope: 4.6mm<br>Opal Hysteroscope: 4.6mm<br>Coral Cystoscope: 4.6mm                         | NA   |
| Working Length  | Pearl Hysteroscope: 216mm<br>Coral Hysteroscope: 206mm<br>Opal Hysteroscope: 206mm<br>Coral Cystoscope: 206mm                             | Pearl Hysteroscope: 216mm<br>Coral Hysteroscope: 206mm<br>Opal Hysteroscope: 206mm<br>Coral Cystoscope: 206mm                         | NA   |
| Illumination  | LEDs (Light Emitting Diode)   | LEDs (Light Emitting Diode)   | NA   |
| Working Channel   | Pearl Hysteroscope: 4.0mm<br>Coral Hysteroscope: 3.0mm<br>Opal Hysteroscope: 3.0mm<br>Coral Cystoscope: 3.0mm                             | Pearl Hysteroscope: 4.0mm<br>Coral Hysteroscope: 3.0mm<br>Opal Hysteroscope: 3.0mm<br>Coral Cystoscope: 3.0mm                         | NA   |
| Camera  | Digital CMOS Camera   | Digital CMOS Camera   | NA   |
| <b>RESECTION SYSTEM</b>   |   |   |  |
| <b>Disposable Resecting Devices (DRD, DRDH, AUTO, AUTO-5Fr), Disposable RF Device (GLO)</b> |   |   |  |
| Cutting Window  | DRDH-Wave+: 8mm<br>DRDH-Flex: 7mm<br>DRDH-Smol: 7mm<br>AUTO: 8mm<br>AUTO-5Fr: 8mm<br>GLO: N/A (no cutting window)                         | DRDH-Wave+: 8mm<br>DRDH-Max: 11mm<br>DRD-3.9: 10mm<br>DRDH-Flex: 7mm<br>DRDH-Smol: 7mm<br>DRD-2.9: 7mm<br>AUTO: 8mm                   | NA   |
| Tip / Electrode Material  | Stainless steel   | Stainless steel   | Metal (Gynecare Proprietary)   |

|                            | Subject Device   | PREDICATE #1<br>Primary Predicate  | PREDICATE #2<br>Secondary Predicate |
|----------------------------|--|--|-------------------------------------|
| 510k#                      | K223813  | K213171  | K962482                             |
| Manufacturer:              | Meditrina Inc.   | Meditrina Inc.   | Gynecare, Inc.                      |
| Device Names               | Aveta System 2.0   | Aveta System<br>Aveta Hysteroscope<br>Aveta Cystoscope   | Scuba (Gynecare Versapoint) System  |
| Working Length             | DRDH-Wave+: 339mm<br>DRDH-Flex: 339mm<br>DRDH-Smol: 339mm<br>AUTO: 318mm<br>AUTO-5Fr: 318 mm<br>GLO: 339mm       | DRDH-Wave+: 339mm<br>DRDH-Max: 339mm<br>DRD-3.9: 328mm<br>DRDH-Flex: 339mm<br>DRDH-Smol: 339mm<br>DRD-2.9: 328mm<br>AUTO: 318mm                      | Twizzle Tip: 360mm                  |
| Insertion OD               | DRDH-Wave+: 3.9mm<br>DRDH-Flex: 2.9mm<br>DRDH-Smol: 2.9mm<br>AUTO: 2.9mm<br>AUTO-5Fr: 1.67mm<br>GLO: 2.33mm      | DRDH-Wave+: 3.9mm<br>DRDH-Max: 3.9mm<br>DRD-3.9: 3.9mm<br>DRDH-Flex: 2.9mm<br>DRDH-Smol: 2.9mm<br>DRD-2.9: 2.9mm<br>AUTO: 2.9mm                      | NA                                  |
| Rotational Speed           | DRDH-Wave+: 5,000 rpm<br>DRDH-Flex: 10,000 rpm<br>DRDH-Smol: 3,000 rpm<br>AUTO: 3,000 rpm<br>AUTO-5Fr: 3,000 rpm | DRDH-Wave+: 3,000rpm<br>DRDH-Max: 3,000rpm<br>DRD-3.9: 3,000rpm<br>DRDH-Flex: 3,000rpm<br>DRDH-Smol: 3,000rpm<br>DRD-2.9: 3,000rpm<br>AUTO: 3,000rpm | NA                                  |
| Suction Assisted Resection | YES  | YES  | NA                                  |

The differences outlined were evaluated through performance testing to demonstrate safety and effectiveness of the Aveta System 2.0.

**VII. Performance Data**

The following performance data have been provided in support of the substantial equivalence determination.

- **Software Verification and Validation Testing** performed per IEC 62304 and documentation provided per FDA’s Guidance for Industry and FDA Staff, “Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices.”
- **Other Tests** were performed per approved test protocols which included:
  - Integrity: System withstands operating pressures
  - Functional Testing: Cut and coagulation, aspiration, irrigation, pressure control
  - Dimensional Inspection and Testing
  - Functional Testing for all components of the system
    - Controller
      - Weight accuracy
      - Pressure accuracy and control
      - Suction
    - Mechanical Resecting Devices
      - Motor speed
      - Oscillation
    - RF Device
      - CUT
      - COAG

- Simulated Use: Tissue resection, regulation of cavity pressure, imaging, CUT, COAG
- Comparative Testing
- Biocompatibility Evaluation per ISO 10993-1 and testing for the Bipolar Resecting Device (GLO). No new testing performed on other components. No change in materials from the cleared device.
- Sterilization Validation per ISO 11135 and ISO 11137-1/-2/-3.
- Packaging Validation per ASTM D4169.
- Accelerated Aging per ASTM F1980
- Electrical Safety & EMC: In accordance with IEC 60601-1 Edition 3.1(or AMD2:2020), IEC 60601-1-2: Edition 4.1(or AMD1:2020), IEC 60601-2-18 and IEC 62304 Edition 1.1:2015-06

**VIII. Conclusions**

The Aveta System 2.0, is substantially equivalent to the cleared predicates based on the same intended use, technological characteristics and principles of operation. Bench testing supports the subject device is as safe and effective as the predicate device for its proposed indications for use.