

August 15, 2022

Biotec Italia, SRL % Mike Berisha Offical Correspondent EVOSkin, LLC 6 Lincoln Knolll LN STE 100A Burlington, Massachusetts 01803

Re: K212790

Trade/Device Name: XLase Plus Regulation Number: 21 CFR 878.4810

Regulation Name: Laser surgical instrument for use in general and plastic surgery and in dermatology

Regulatory Class: Class II Product Code: GEX, ONF Dated: July 11, 2022

Received: July 14, 2022

Dear Mike Berisha:

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

K212790 - Mike Berisha Page 2

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-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/training-and-continuing-education/cdrh-learn) 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">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,

Jianting Wang
Acting Assistant Director
DHT4A: Division of General Surgery Devices
OHT4: Office of Surgical
and Infection Control 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)* K212790

Device Name XLase Plus

Indications for Use (Describe)

XLase Plus is indicated for use as follows:

Diode 808/760 nm 4000W ALEX PRO Handpiece: Indicated for the treatment of hair removal with static and dynamic modes intended for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime.

- Treatment of Pseudofolliculitis barbae (PFB)
- Use on all skin types (Fitzpatrick I-VI).

SLP ND:YAG 1064 nm Handpiece: Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime. (Skin Types Fitzpatrick I-VI), photocoagulation and hemostasis of benign pigmented and benign vascular lesions, treatment of benign pigmented lesions, such as but not limited to warts, telangiectasia, leg veins and spider veins.

Q Switch ND:YAG 1064 nm Handpiece: Indicated for removal of dark tattoos and treatment of benign pigmented lesions.

CPL Handpiece: Indicated for use Fitzpatrick skin types I - IV, as shown in the table below. Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime. Photocoagulation of benign vascular lesions, photo thermolysis of blood vessels, treatment of benign pigmented lesions.

Pulsed light	Hair reduction	Benign	Blood vessels	Benign
Wavelength range		Vascular lesions		Pigmented lesions
500-1200nm	-	Skin Types I, II	Skin Types I, II	=
520-1200nm	-	SkinType III	Skin Type III	Skin Types I, II
550-1200nm	Skin Types I, II	-	-	Skin Type Ill
595-1200nm	Skin Type Ill	-	-	-
650-1200nm	Skin Type IV	-	-	Skin Type IV

ERBIUM:YAG FRACTIONAL 2940 nm Handpiece: Indicated for procedure requiring resurfacing of soft tissue with fractionated handpiece.

Diode 2800W 810nm Handpiece: Indicated for use on all skin types (Fitzpatrick skin types I – VI), including tanned skin. Indicated for:

- the treatment of benign vascular and benign pigmented lesions,
- permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime.

Diode 1200W 810nm Handpiece:

Indicated for use on all skin types (Fitzpatrick skin types I – VI), including tanned skin.

Indicated for the treatment of benign vascular lesions, including angiomas, hemangiomas, telangiectasia and other benign vascular lesions, and the treatment for pseudo folliculitis barbae.

Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs regrowing when measured at 6, 9, and 12 months after the completion of a treatment regime.

Indicated for the treatment of benign pigmented lesions and leg veins.

ALEX 755nm Handpiece: Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime. Treatment of benign pigmented lesions. Treatment of wrinkles and the photocoagulation of dermatological benign vascular lesions (such as port-wine stains, hemangiomas, telangiectasias). On all skin types (Fitzpatrick I- VI) including tanned skin.

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 summary of 510(k) includes the safety and effectiveness information submitted in accordance with the requirements of 21 CFR 807.92

I. SUBMITTER

BIOTEC ITALIA S. r. 1 Viale Della Repubblica 20 36031 Dueville VI, Italy

Email: info@biotecitalia.com

Tel.: +39 0444 591683 Fax: +39 0444 361032

Establishment Registration Number: currently not registered.

II. SUBMISSION CORRESPONDENT and AUTHORIZED DISTRIBUTOR

Mike Berisha EVOSkin, LLC. 6 Lincoln Knoll Ln Ste 100A Burlington, MA 01803-4729

Establishment Registration Number: currently not registered.

mike.berisha@evoskin.com Phone: 1 (786) 778-0419

III. DATE SUMMARY PREPARED: August 12, 2022

IV. SUBJECT DEVICE

Trade Name (proprietary name): XLase Plus

Common or Usual Name: Medical Laser and Pulsed Light Platform

Classification Name: Powered Laser Surgical Instrument

Device Class: II

Regulation Number: 21 CFR 878.4810

Product Code: GEX, ONF

V. PREDICATE DEVICE





Trade Name: Deka Luxea 510k - K192539 El., EN. Electronic Engineering SPA Via Baldanzese 17 Calenzano, IT 50041

VI. REFERENCE DEVICES

Trade Name: Elysion Pro 510k – K193367

Trade Name: LightSheer Duet

510k - K053628

Trade Name: Dynamis Pro Family

510k - K143723

Trade Name: GentleMax Pro Plus

510k - K201111

VII. DEVICE DESCRIPTION

XLase Plus, laser for medical applications. It features two models: XLase Plus Standing (with wheels) and XLase Plus Table (tabletop).

The two medical devices are identical, contain the same electronic boards and the same critical components, use the same software and are able to perform the same aesthetic treatments. The generic components of XLase Plus Table are a subset of those of XLase Plus Standing. The difference between the two devices is that XLase Plus Standing is built on wheels while XLase Plus Table has no wheels but can be easily placed on a table due to its low weight. The device is for prescription use only.

The XLase Plus Standing and XLase Plus Table medical devices consists of:

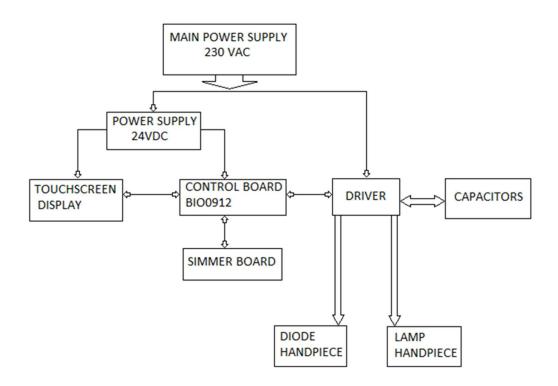
- System Console
- Operator control panel
- Touch screen monitor
- Power cable
- Accessories and components

Principles of Operation



The XLase Plus system principles of operation can be represented with the following block diagram:

XLase Plus Standing and Table (Consoles) Principles of Operation / Mechanism of Action:



Proposed Conditions of Use

Temperature: 10 °C to 40 °C Relative humidity: 30% to 75%

Technology

The XLase Plus offers the flexibility to perform different medical and aesthetic treatments due to different laser modules. Treatment parameters are set according to Indications for Use.

A range of values is available for each parameter. The integrated safety functions prevent the selection of values outside this range. However, because the settings of some parameters depend on other parameters, it is not always possible to use the full range of values for all parameters.



Spectrum	and filter
Handpiece Type	Description
CPL	The wavelength range and filters determine the depth of light penetration and the spectral selectivity associated with the target chromophores. The 50x10mm optical guide determines the covered surface if the distal end of the optical guide is positioned perpendicular to the patient's skin.
Laser	SLP ND:YAG 1064 nm: The size of the selected spacer determines the surface covered when the distal end of the tip is positioned perpendicular to the patient's skin. It will be chosen according to the characteristics of the vessel (diameter, depth). ERBIUM:YAG FRACTIONAL 2940 nm: The size of the selected spacer determines the covered surface of the treatment area that absorbs the laser energy when the distal end of the tip is positioned perpendicularly on the patient's skin. QSWITCH ND: YAG 1064 nm: The size of the selected spacer determines the surface covered when the distal end of the tip is positioned perpendicular to the patient's skin. ALEX 755nm: The size of the selected spacer determines the covered surface of the treatment area that absorbs the laser energy when the distal end of the tip is positioned perpendicular to the patient's skin
Diode handpiece*	Diode 808/760 nm 4000W ALEX PRO, Diode 810nm 2800W and Diode 810nm 1200W: The 10x10mm optical guide determines the covered surface if the distal end of the optical guide is positioned perpendicular to the patient's skin.

^{*}CPL and Diode handpieces are equipped with an integrated cooling mechanism that provides continuous skin cooling through contact in the treatment area.

VIII. INDICATIONS FOR USE

XLase Plus is indicated for use as follows:





Diode 808/760 nm 4000W ALEX PRO Handpiece: Indicated for the treatment of hair removal with static and dynamic modes intended for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs regrowing when measured at 6, 9, and 12 months after the completion of a treatment regime.

- Treatment of Pseudofolliculitis barbae (PFB)
- Use on all skin types (Fitzpatrick I-VI).

SLP ND:YAG 1064 nm Handpiece: Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime. (Skin Types Fitzpatrick I-VI), photocoagulation and hemostasis of benign pigmented and benign vascular lesions, treatment of benign pigmented lesions, such as but not limited to warts, telangiectasia, leg veins and spider veins.

Q Switch ND:YAG 1064 nm Handpiece: Indicated for removal of dark tattoos and treatment of benign pigmented lesions.

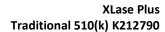
CPL Handpiece: Indicated for use Fitzpatrick skin types I - IV, as shown in the table below. Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime. Photocoagulation of benign vascular lesions, photo thermolysis of blood vessels, treatment of benign pigmented lesions.

Pulsed light	Hair reduction	Benign	Blood vessels	Benign
Wavelength range		Vascular lesions		Pigmented lesions
500-1200nm	-	Skin Types I, II	Skin Types I, II	-
520-1200nm	-	SkinType III	Skin Type III	Skin Types I, II
550-1200nm	Skin Types I, II	-	-	Skin Type Ill
595-1200nm	Skin Type Ill	-	-	-
650-1200nm	Skin Type IV	-	-	Skin Type IV

ERBIUM:YAG FRACTIONAL 2940 nm Handpiece: Indicated for procedure requiring resurfacing of soft tissue with fractionated handpiece.

Diode 2800W 810nm Handpiece: Indicated for use on all skin types (Fitzpatrick skin types I – VI), including tanned skin. Indicated for:

- the treatment of benign vascular and benign pigmented lesions,
- permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime.





Diode 1200W 810nm Handpiece:

Indicated for use on all skin types (Fitzpatrick skin types I - VI), including tanned skin.

Indicated for the treatment of benign vascular lesions, including angiomas, hemangiomas, telangiectasia and other benign vascular lesions, and the treatment for pseudo folliculitis barbae.

Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime.

Indicated for the treatment of benign pigmented lesions and leg veins.

ALEX 755nm Handpiece: Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime. Treatment of benign pigmented lesions. Treatment of wrinkles and the photocoagulation of dermatological benign vascular lesions (such as port-wine stains, hemangiomas, telangiectasias). On all skin types (Fitzpatrick I- VI) including tanned skin.

IX. COMPARISON OF TECHNOLOGICAL CHARACTERISTICS WITH THE PREDICATE AND REFERENCE DEVICES

	Subject Device XLase Plus	Predicate Device Deka Luxea K192539	Reference Device Elysion Pro K193367	Reference Device LightSheer Duet K053628	Reference Device Dynamis Pro Family K143723	Reference Device GentleMax Pro Plus K201111
Medical Device Common Name	Medical Laser and Pulsed Light platform	Medical Laser and pulsed Light platform	Diode Laser Hair Removal System	Pulsed Diode Array Laser	Er:YAG/Nd:YAG Surgical Laser	Dermatology Laser System
Manufacturer:	BIOTEC ITALIA S.R.L.	DEKA M.E.L.A.	High Technology Products, S.L.U	LUMENIS LTD.	FOTONA	CANDELA CORPORATION
Console	XLase Plus Standing and Table	Deka Luxea	Elysion Pro	LightSheer Duet	Dynamis Pro	GentleMax Pro
Product Code	GEX, ONF	GEX, ONF	GEX	GEX	GEX, ONG	GEX
Configuration	•System Console •Operator control panel •Touch screen monitor •Laser handpiece(s) •Diode(s) handpiece(s)	•System Console •Operator control panel •Touch screen monitor •Laser handpiece(s) •Diode(s) handpiece(s)	System Console Operator control panel Touch screen monitor Diode handpiece	System Console Operator control panel Touch screen monitor Laser handpiece(s) Diode(s) handpiece(s)	System Console Operator control panel Touch screen monitor Laser handpiece(s) Diode(s) handpiece(s)	System Console Operator control panel Touch screen monitor Laser handpiece(s) Diode(s) handpiece(s)
Emission Activation	Foot or finger switch	Foot or finger switch	Finger switch	Foot or finger switch	Foot or finger switch	Foot or finger switch
Electrical specifications	115-240v ~, 50-60Hz, 2300VA max.	115-240v ~, 50-60Hz, 2300VA max.	115-240v ~, 50-60Hz, 2300VA max.	115-240v ~, 50-60Hz, 2300VA max.	115-240v ~, 50-60Hz, 2300VA max.	115-240v ~, 50-60Hz, 2300VA max.
Operating Environment	Temperature: 10 °C to 40 °C Relative humidity: 30% to 75%	Temperature: 10 °C to 40 °C Relative humidity: 30% to 75%	Temperature: 18 °C to 28 °C	Temperature: 10 °C to 40 °C Relative humidity: 30% to 75%	Temperature: ambient temperature range +10 °C to +25 °C;	Temperature: 65° and 85°F (18° and 29°C). Relative humidity: 30% to 75%



					Relative humidity: 30% to 75% -non condensing	
Storage Conditions	Temperature (-10 – 38 °C) or (-14 to 100 °F). Relative humidity % range is 1.5% to 90%.	Temperature: 5 °C to 50 °C Relative humidity: 30% to 95%	Temperature: 2 – 50 °C Relative humidity <90% (without condensation)	Temperature: -5°C - 55°C 23°F - 131°F Relative humidity: 90% @ 35°C, 32% @ 55°C	Temperature: -40 °C to +70 °C (without cooling water) Relative humidity: 10% to 100% condensing	Temperature: 40° and 110° F (4.5° and 43°C). Relative humidity: 30% to 95%
Sterilization	N/A	N/A	N/A	N/A	N/A	N/A
Packaging	A wooden pallet: this pallet (80 x 65 x 11 cm for Table and 82 x 76 x 64 cm for) is made of wood treated according to ISPM-15 - Cardboard box on the outside; - Polyurethane foam - Transportation monitoring: Shockwave label Tiltwatch label Data logger (temperature and humidity)	Unknown	Unknown	Unknown	Unknown	Unknown
Body areas of application	Feet, Legs, Hip, Thigh, Abdomen, Chest, Shoulders, Back, Arms, Neck, Face and Hands	Feet, Legs, Hip, Thigh, Abdomen, Chest, Shoulders, Back, Arms, Neck, Face and Hands.	Feet, Legs, Hip, Thigh, Abdomen, Chest, Shoulders, Back, Arms, Neck, Face and Hands.	Feet, Legs, Hip, Thigh, Abdomen, Chest, Shoulders, Back, Arms, Neck, Face and Hands.	Feet, Legs, Hip, Thigh, Abdomen, Chest, Shoulders, Back, Arms, Neck, Face and Hands.	Feet, Legs, Hip, Thigh, Abdomen, Chest, Shoulders, Back, Arms, Neck, Face and Hands.
Duration of Body Contact	The material with direct tissue contact with the skin is the stainless steel from (spacers, and diode handpieces) with contact duration (A) for <= 24 hours.	Contact duration (A) for ≤ 24 hours.	Contact duration (A) for ≤ 24 hours.	Contact duration (A) for ≤ 24 hours.	Contact duration (A) for ≤ 24 hours.	Contact duration (A) for ≤ 24 hours.
User Interface	Display screen (software XLASE PLUS)	The Touch Screen/Display Panel provides a simple graphical user interface (GUI) from which you can set the operating mode, laser parameters DCD parameters,	The console provides touchscreen computer control	The console provides touchscreen computer control	Touch screen	The Touch Screen/Display Panel provides a simple graphical user interface (GUI) from which you can set the operating mode, laser parameters DCD parameters



Software	The human machine interface was developed with "Touch Win Edit Tool" The processor used is by ARM7 LCD MCU Display is a 208-LQFP - LPC2470FBD208 from semiconductor manufacturer NXP.	Unknown type	Unknown type	Unknown type	Unknown type	Unknown type
			Handpieces			
		Indications for Use	Elysion handpiece: Indications for use for ELYSION diode laser hair removal system			
Diode 808/760 nm 4000W ALEX PRO	Diode 808/760 nm 4000W ALEX PRO: Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re- growing when measured at 6, 9, and 12 months after the completion of a treatment regime. • Treatment of Pseudofolliculitis barbae (PFB) • Use on all skin types (Fitzpatrick I-VI).		with 755nm and 810nm applicators include: • Hair Removal with Static and Dynamic modes intended for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9, and 12 months after the completion of a treatment regime. • Treatment of Pseudofolliculitis barbae (PFB) • Use on all skin types			
Handpiece		Specifications	(Fitzpatrick I-VI).			
	Product Code: GEX		Product Code: GEX			
	Laser Wavelength: 808, 760 nm		Laser Wavelength: 810 nm, 755 nm			
	Fluence: 32 J/cm2 ± 20 % (24 – 40 J/cm2)		Fluence: 40 J\cm ²			
	Handpiece Spot Size: Spot Size 15 mm - 15 x 10mm ± 20 % (12-18 x 8-12 mm) Spot Size 9 mm - 9 x 9 mm ± 20 % (7.2-10.8 x 7.2-10.8 mm)		Handpiece Spot Size: 10 x 10, 18 x 10mm			
	Pulse Duration: up to 120 ms Min Pulse Duration: 10 ms \pm 20 % (8 - 12 ms) Max Pulse Duration 100 ms \pm 20 % (80-120 ms)		Pulse Duration: 3 – 400 ms			



	Pulse Repetition Rate (Hz): 1 - 8 Hz ± 20 % (0.8 - 10.0 Hz) (Long Pulse or Static up) to 3 Hz (Motion Speed or Dynamic) up to 5 - 10 Hz Cooling Temperature: (Sapphire cooling) 5°C		Pulse Repetition Rate (Hz): Static up to 3Hz Dynamic 5 - 15 Hz Cooling Temperature: (Sapphire cooling) 5°C		
	Indication	ns for Use			
Laser SLP ND:YAG 1064nm Handpiece	SLP ND:YAG 1064 nm Handpiece: Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs re- growing when measured at 6, 9, and 12 months after the completion of a treatment regime. (Skin Types Fitzpatrick I-VI), photocoagulation and hemostasis of benign pigmented and benign vascular lesions, treatment of benign pigmented lesions, such as but not limited to warts, telangiectasia, leg veins and spider veins.	SPARKS LASER handpiece: Indicated for removal of unwanted hair, for stable long term or permanent hair reduction (Skin Types Fitzpatrick I-VI), photocoagulation and hemostasis of benign pigmented and vascular lesions, such as but not limited to warts, telangiectasia, leg veins and spider veins, treatment of benign pigmented lesions.			
	Specifi	cations			
	Product Code: GEX	Product Code: GEX			
	Laser Wavelength: 1064 nm	Laser Wavelength: 1064 nm			
	Fluence: (2.5 mm) 100-584 ± 20 % J\cm2 (80 - 700 J/cm2) (4 mm) 30-250 ± 20 % J\cm2 (24 - 300 J/cm2) (6 mm) - 50 - 136 J/cm2 ± 20 % (40 - 170 J/cm2) (10 mm) 4 - 48 ± 20 % J/cm2 (5 - 60 J/cm2) Handpiece Spot Size:	Fluence: 80-700 J\cm² (2.5 mm) 30 -250 J\cm² (4 mm) 14-170 J\cm² (6 mm) 5-60 J\cm² (10 mm)			
	Spot Size (2.5 mm) - 2.5 mm ± 20 % (2 - 3 mm)	Handpiece Spot Sizes: Ø 2.5, 4, 6, 10 mm			

XLase Plus



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			Γ	I	T.	
	Spot Size (4 mm) - 4					
	$mm \pm 20 \% (3.2 - 4.8 mm)$					
	4.8mm) Spot Size (6 mm) - 6					
	$mm \pm 20 \% (4.8 - 7.2)$					
	mm)					
	Spot Size (10 mm) -					
	$10 \text{ mm} \pm 20 \% (8 - $					
	12mm)					
	Pulse Duration:					
	Min Pulse Duration – 250 us ± 20 %					
	(200 - 300 us) = 0.25					
	$ms \pm 20 \% (0.20 -$					
	0.30 ms)	Pulse Duration: 1 -				
	,	280 ms				
	Max Pulse Duration					
	$50 \text{ ms} \pm 20 \%$					
	(40 - 60 ms) = 50000 $us \pm 20 \% (40000 -$					
	60000 us)					
	Pulse Repetition Rate:	Pulse Repetition				
	$1 - 8 \text{ Hz} \pm 20 \%$	Rate:				
	(0.8 - 10.0 Hz)	Single shot to 10 Hz				
	Indication	ns for Use				
-	Laser QS ND:YAG	PRISMA LASER				
	1064 nm:	handpiece:				
	Indicated for removal	Indicated for removal				
	of dark tattoos and	of dark tattoos and				
	treatment of benign	treatment of benign				
	pigmented lesions. Specification	pigmented lesions.				
	•					
	Product Code: GEX	Product Code: GEX				
	Laser Wavelength: 1064 nm	Laser Wavelength: 1064 nm				
Laser QS ND:YAG 1064 nm	Fluence:	Fluence: 14 J/cm ² (2.5				
Handpiece	$(2.5 \text{ mm}) - 17 \text{ J/cm}^2 \pm$	x 2.5 mm), 9				
Transpicce	20 % (13.6 - 20.4 J/cm ²)	J/cm^2 (3 x 3 mm)				
	/					
	Handpiece Spot Size:	Handpiece Spot Sizes:				
	Spot Size (2.5 mm) -	2.5 x 2.5 mm, 3 x 3				
	2.5 mm ± 20 % (2 - 3mm)	mm				
	311111)					
	Pulse Duration: 9 ns ±					
	Pulse Duration: 9 ns \pm 20 % (7.2 - 10.8 ns)	Pulse Duration: 9 ns				
	20 70 (7.2 10.0 H3)					
	Pulse Repetition Rate:	D.I. D. W. D.				
	$0.8 - 4 \text{ Hz} \pm 20 \% (1 - $	Pulse Repetition Rate: 1 to 5 Hz				
	5 Hz)	1 to 3 fiz				
	Indication					
CDI Calibrated	CPL Calibrated	LILAC Pulsed Light				
CPL Calibrated Pulsed Light	Pulsed Light:	handpiece:				
Handpiece	Indicated for use on Fitzpatrick skin types	Permanent hair reduction.				
	I – IV, as shown in	Photocoagulation of				
	the table below.	benign vascular				
	and more delow.	oomen rasoular		I .	1	L



Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs regrowing when measured at 6, 9, and 12 months after the completion of a treatment regime. Photocoagulation of benign vascular lesions, photo thermolysis of blood vessels, treatment of benign pigmented lesions. Table 2 -CPL — Subject Device Wavelength Ranges	lesions, photo thermolysis of blood vessels, treatment of benign pigmented lesions. Refer to Table 1 -CPL - Predicate Device Wavelength Ranges			
Specif	ications			
Product Code: ONF	Product Code: ONF			
Pulse Light Emission Spectrum: 500-1200nm, 520-1200nm, 550-1200nm, 595-1200nm, 650-1200nm	Pulse Light Emission Spectrum: 500 - 1200 nm, 520 - 1200 nm, 600 - 1200 nm, 650 - 1200 nm, 550 - 1200 nm			
Fluence: 0.8 - 20 J/cm ² ± 20 % (1 - 25 J/cm ²)	Fluence: 1 - 25 J/cm ²			
Handpiece Spot Size: Spot Size - 10 x 50 mm ± 20 % (8-12 x 40-60 mm)	Handpiece Spot Sizes: 48x13 mm			
Pulse Duration: Min Pulse Duration 1 $ms \pm 20\% (0.8 - 1.2)$ ms) Max Pulse Duration $50 ms \pm 20\% (40 - 60)$ ms)	Pulse Duration: 3 – 124 ms			
Pulse Repetition Rate:	Repetition Rate: 0.5			
0.5 Hz max. Cooling Temperature: (Integrated Sapphire Cooling provided via handpiece light guide) 15-25°C	Hz max. Cooling Temperature: (Integrated Sapphire Cooling provided via handpiece light guide) 5-25°C			
		Indications for Use		



ERBIUM:YAG FRACTIONAL 2940 nm handpiece	ERBIUM:YAG FRACTIONAL 2940 nm Indicated for procedure requiring resurfacing of soft tissue with fractionated handpiece				Indicated for procedure requiring resurfacing of soft tissue with fractionated handpiece	
		Specifications (Ha	andpiece with spacer for I	Fractional effects)		
	Wavelength: 2940nm				Wavelength: 2940nm	
	Pulse Duration: Min Pulse Duration $500 \text{ us} \pm 20 \%$ (400 - 600 us) Max Pulse Duration $2 \text{ ms} \pm 20 \%$ (1.6 - 2.4 ms) = $2000 \text{ us} \pm 20 \% (1600)$				Pulse Duration: Min Pulse Duration: 0.1 ms Max Pulse Duration: 1.5 ms	
	- 2400 us) Pulse Repetition Rate: 1 ± 20 % (0.8 – 1.2 Hz) – Nominal 1 Hz				Pulse Repetition Rate: 4	
	Spot Size (6 X6 mm, 9 X 9 mm) ± 20 %				Unknown	
	(Min-Max Energy): 1.0-7.85 mJ				unknown	
	Fractional Lens (spot Size): 6 x 6, 9 X 9 Fractional Lens (shape of microbeams): Round				Fractional Lens (spot Size): 9X9 mm Fractional Lens (shape of microbeams): Round	
	Fractional Lens (microbeams diameter): 250 µm				Fractional Lens (microbeams diameter): 250 µm	
	Fractional Lens (distance between microbeams): 0.75 mm				Fractional Lens (distance between microbeams): 0.75 mm	
		Indication	s for Use			



	D: 1 2000M 010			LightSheer ET 805nm Laser	
	Diode 2800W 810nm:			Handpiece:	
	Indicated for use on			Indicated for use on	
	all skin types			all skin types (Fitzpatrick skin types I	
	(Fitzpatrick skin types I – VI),			- VI), including tanned	
	including tanned			skin. Indicated for the	
	skin.			treatment of vascular	
	Indicated for			lesions, including	
	-the treatment of			angiomas,	
	benign vascular and			hemangiomas,	
	pigmented lesions,			telangiectasia and other	
	- permanent reduction			benign vascular	
	in hair regrowth,			lesions, and the	
	defined as a long term,			treatment for pseudo	
	stable reduction in the			folliculitis barbae. The	
	number of hairs re-			LightSheer® DueffM	
	growing when			Laser System with	
	measured at 6, 9, and			LightSheer® ETTM	
	12 months after the			Laser Handpiece is also	
	completion of a			intended for hair	
	treatment regime.			removal, permanent	
Diode 2800W				hair reduction, and	
810nm Handpiece				the treatment of	
				benign pigmented lesions and leg veins.	
				icsions and icg venis.	
		Specific	ations		
	Product Code: GEX	Specific	ations	Product Code: GEX	
		Specific	ations	Laser Wavelength:	
	Product Code: GEX Laser Wavelength: 810 nm	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm	
	Laser Wavelength: 810 nm	Specific	ations	Laser Wavelength:	
	Laser Wavelength: 810 nm Fluence: 10 - 100	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm	
	Laser Wavelength: 810 nm	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal)	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm ² ± 20% (8 - 120	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal)	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration -	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal)	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ²	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms)	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration -	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ²	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 -	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms)	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms) Pulse Repetition Rate:	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms) Pulse Repetition Rate: 0.8 - 2.4 Hz ± 20 %	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400 ms	
	Laser Wavelength: 810 nm Fluence: $10 - 100$ $J/cm^2 \pm 20\%$ (8 - 120 J/cm^2) Pulse Duration Min Pulse Duration - 10 ms $\pm 20\%$ (8 - 12 ms) Max Pulse Duration - 400 ms $\pm 20\%$ (320 - 480 ms) Pulse Repetition Rate: $0.8 - 2.4 \text{ Hz} \pm 20\%$ (1 - 3 Hz)	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400 ms	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms) Pulse Repetition Rate: 0.8 - 2.4 Hz ± 20 % (1 - 3 Hz) Handpiece Spot Size:	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400 ms Pulse Repetition Rate: up to 3 Hz	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms) Pulse Repetition Rate: 0.8 - 2.4 Hz ± 20 % (1 - 3 Hz) Handpiece Spot Size: Spot Size (9 mm) - 9 x	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400 ms Pulse Repetition Rate: up to 3 Hz Spot size: 9 x 9 mm,	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms) Pulse Repetition Rate: 0.8 - 2.4 Hz ± 20 % (1 - 3 Hz) Handpiece Spot Size: Spot Size (9 mm) - 9 x 9 mm ± 20 % (7.2 -	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400 ms Pulse Repetition Rate: up to 3 Hz	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms) Pulse Repetition Rate: 0.8 - 2.4 Hz ± 20 % (1 - 3 Hz) Handpiece Spot Size: Spot Size (9 mm) - 9 x 9 mm ± 20 % (7.2 - 10.8 x 7.2 - 10.8 mm), Area= 81 mm²	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400 ms Pulse Repetition Rate: up to 3 Hz Spot size: 9 x 9 mm, Area = 81 mm ²	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms) Pulse Repetition Rate: 0.8 - 2.4 Hz ± 20 % (1 - 3 Hz) Handpiece Spot Size: Spot Size (9 mm) - 9 x 9 mm ± 20 % (7.2 - 10.8 x 7.2 - 10.8 mm), Area= 81 mm² Cooling Temperature:	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400 ms Pulse Repetition Rate: up to 3 Hz Spot size: 9 x 9 mm, Area = 81 mm ² Cooling Temperature:	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms) Pulse Repetition Rate: 0.8 - 2.4 Hz ± 20 % (1 - 3 Hz) Handpiece Spot Size: Spot Size (9 mm) - 9 x 9 mm ± 20 % (7.2 - 10.8 x 7.2 - 10.8 mm), Area= 81 mm²	Specific	ations	Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400 ms Pulse Repetition Rate: up to 3 Hz Spot size: 9 x 9 mm, Area = 81 mm ²	
	Laser Wavelength: 810 nm Fluence: 10 - 100 J/cm² ± 20% (8 - 120 J/cm²) Pulse Duration Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 400 ms ± 20 % (320 - 480 ms) Pulse Repetition Rate: 0.8 - 2.4 Hz ± 20 % (1 - 3 Hz) Handpiece Spot Size: Spot Size (9 mm) - 9 x 9 mm ± 20 % (7.2 - 10.8 x 7.2 - 10.8 mm), Area= 81 mm² Cooling Temperature:	Specific		Laser Wavelength: 790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ² Pulse Duration: 5 - 400 ms Pulse Repetition Rate: up to 3 Hz Spot size: 9 x 9 mm, Area = 81 mm ² Cooling Temperature:	



Diode 1200W 810nm Handpiece	Diode 1200W 810nm: Indicated for use on all skin types (Fitzpatrick skin types I – VI), including tanned skin. Indicated for the treatment of benign vascular lesions, including angiomas, hemangiomas, telangiectasia and other benign vascular lesions, and the treatment for pseudo folliculitis barbae. Indicated for permanent reduction in hair regrowth, defined as a long term, stable reduction in the number of hairs regrowing when measured at 6, 9, and 12 months after the completion of a treatment regime. Indicated for the treatment of benign pigmented lesions and leg veins.	Specific	ations	LightSheer Duet System with LightSheer ET 805nm Laser Handpiece: Indicated for use on all skin types (Fitzpatrick skin types I – VI), including tanned skin. Indicated for the treatment of vascular lesions, including angiomas, hemangiomas, telangiectasia and other benign vascular lesions, and the treatment for pseudo folliculitis barbae. The LightSheer® DueffM Laser System with LightSheer® ETTM Laser Handpiece is also intended for hair removal, permanent hair reduction, and the treatment of benign pigmented lesions and leg veins. Product Code: GEX Laser Wavelength:	
	810 nm Fluence: 8 – 80 J/cm ² ± 20 % (10 -100			790 -950 nm (800 nm Nominal) Fluence: 10 -100 J/cm ²	
	J/cm ²)				
	Pulse Duration: Min Pulse Duration - 10 ms ± 20 % (8 - 12 ms) Max Pulse Duration - 60 ms ± 20 % (48 - 72 ms)			Pulse Duration: 5 - 400 ms	
	Pulse Repetition Rate: $0.8-2.4~\mathrm{Hz}\pm20~\%~(1-3~\mathrm{Hz})$			Pulse Repetition Rate: up to 3 Hz	
	Handpiece Spot Size: Spot Size (9 mm) - 9 x 9 mm ± 20 % (7.2 - 10.8 x 7.2 - 10.8 mm), Area = 81 mm ²			Spot size: 9 x 9 mm, Area = 81 mm ²	
	Cooling Temperature: (Sapphire cooling) 5°C			Cooling Temperature: (Sapphire cooling) 5°C	
	(Suppline cooling) 3 C			(Supplific Cooling) 5 C	
ALEX 755nm			Indication	s for Use	
Handpiece	ALEX 755nm:				Alessandrite 755nm:



	Indicated for				Temporary hair
	permanent reduction in				reduction. Stable
	hair regrowth, defined				long-term or
	as a long term, stable				permanent reduction
	reduction in the				through selective
	number of hairs re-				targeting of melanin
	growing when				in hair follicles.
	measured at 6, 9, and				Permanent hair
	12 months after the				reduction is defined
	completion of a				as long-term stable
	treatment regime.				reduction in the
	On all skin types				number of hairs
	(Fitzpatrick I- VI)				regrowing after a
	including				treatment
	tanned skin.				regime. Permanent
	Treatment of benign				hair reduction is
	pigmented lesions.				defined as the long-
	Treatment of wrinkles				term, stable reduction
	and the				in the number of hairs
	photocoagulation of				regrowing when
	dermatological benign				measured at 6, 9, and
	vascular lesions (such				12 months after the
	as port-wine stains,				completion of a
	hemangiomas,				treatment regime. On
	telangiectasias).				all skin types
					(Fitzpatrick I- VI)
					including
					tanned skin.
					Treatment of benign
					pigmented lesions.
					Treatment of
					wrinkles.
					The photocoagulation
					of dermatological
					vascular lesions (such
					as port-wine stains,
					hemangiomas,
					telangiectasias).
		Specific	cations		
	Product Code: GEX				Product Code: GEX
	Laser Wavelength:				Laser Wavelength:
	755nm				755nm
	Fluence: 44 J/cm ² ±				Fluence: 53 J/cm2
	20 % (35.2 - 53 J/cm ²)				
1	Handpiece Spot Size:				
1	Spot Size (2.5 mm) -				
1	$2.5 \text{ mm} \pm 20 \% (2 - 3)$				
1	mm)				
1	Spot Size (4 mm) - 4				
	$mm \pm 20 \% (3.2 -$				
1	4.8mm)				
1	Spot Size (5 mm) - 5				Handpiece Spot Size:
1	$mm \pm 20 \% (4.0 - 6.0)$				6 mm
1	mm)				
1	Spot Size (6 mm) - 6				
1	$mm \pm 20 \% (4.8 - 7.2)$				
1	mm)				
1	Spot Size (7 mm) - 7				
				i l	
	$mm \pm 20 \% (5.6 - 8.4)$				
	mm)				
	`				



10 mm ± 20 % (8 - 12mm)			
Pulse Duration			
Min Pulse Duration – 250 us ± 20 %			
(200 - 300 us)			
(200 200 45)			Pulse Duration: 250us-100000 us
Max Pulse Duration			230us-100000 us
$10 \pm 20 \% (8 - 12 \text{ ms})$			
$= 1000 \pm 20 \% (8000 - 12000)$			
12000 us)			
Pulse Repetition Rate:			Pulse Repetition Rate:
$1 - 8 \text{ Hz} \pm 20 \%$			up to 10Hz
(0.8 - 10.0 Hz)			up to 10112

Pulsed light Wavelength range	Hair reduction	Benign Vascular lesions	Blood vessels	Benign Pigmented lesions
500-1200nm	-	Skin Types I, II	Skin Types I, II	-
520-1200nm	-	Skin Type III	Skin Type III	Skin Types I, II
550-1200nm	Skin Types I, II	-	-	Skin Type III
600-1200nm	Skin Type Ill	-	-	-
650-1200nm	Skin Type IV	-	-	Skin Type IV

Table 1 - Predicate Device Wavelength Ranges

Pulsed light Wavelength range	Hair reduction	Benign Vascular lesions	Blood vessels	Benign Pigmented lesions
500-1200nm	-	Skin types I, II	Skin types I, II	
520-1200nm	-	Skin types III	Skin types III	Skin types I, II
550-1200nm	Skin types I, II	-	-	Skin types III
595-1200nm	Skin types III	_	-	-
650-1200nm	Skin types IV	-	-	Skin types IV

Table 2 - CPL – Subject Device Wavelength Range

X. NON-CLINICAL TESTING

The following non-clinical tests were performed to support substantial equivalence determination.

Biocompatibility Testing

Skin Sensitization (ISO 10993-10: 2010)

Irritation (ISO 10993-23: 2021)





Cytotoxicity (ISO 10993-5:2009)

Electrical safety and electromagnetic compatibility (EMC)

Electrical safety and EMC testing were conducted on the XLase Plus and required accessories. The subject device and required accessories comply with the IEC 60601-1 standard for electrical safety and the IEC 60601-1-2 standard for EMC.

Software Verification and Validation Testing

Verification and validation testing was conducted on the software interface and firmware and the documentation provided is as recommended in the FDA's Guidance for Industry and FDA Staff, "Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices." The firmware and software interface for this device were considered as a "moderate" level of concern.

Performance Testing Bench

The performance of the XLase Plus has been verified according to Biotec Italia SRL, procedures for product design and development to ensure that the device emits set energy parameters within specifications, as intended.

XI. CLINCIAL TESTING

Clinical studies were not needed to support substantial equivalence.

XII. CONCLUSIONS

Based on the comparison and analysis above, the proposed subject device is determined to be Substantially Equivalent (SE) to the predicate device.