August 11, 2020

KARL STORZ Endoscopy - America, Inc.
Winkie Wong
Manager Regulatory Affairs
2151 E. Grand Avenue
El Segundo, California 90245

Re: K200740
Trade/Device Name: Flexible HD Video Rhino-Laryngoscope System
Regulation Number: 21 CFR 874.4760
Regulation Name: Nasopharyngoscope (flexible or rigid) and accessories
Regulatory Class: Class II
Product Code: EOB
Dated: July 3, 2020
Received: July 8, 2020

Dear Winkie Wong:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for

devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance) and CDRH Learn (https://www.fda.gov/training-and-continuing-education/cdrh-learn). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

for Michael J. Ryan
Director
DHT1C: Division of ENT, Sleep Disordered Breathing, Respiratory and Anesthesia Devices
OHT1: Office of Ophthalmic, Anesthesia, Respiratory, ENT and Dental Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: 06/30/2020
See PRA Statement below.

510(k) Number *(if known)*
K200740

Device Name
Flexible HD Video Rhino-Laryngoscope System

Indications for Use *(Describe)*
The KARL STORZ CMOS HD Video Rhino-Laryngoscope System is indicated to provide visualization of the nasal lumens and airway anatomy (including nasopharyngeal and trachea) during diagnostic 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.

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K200740 - 510(k) Summary

This 510(k) Summary is being submitted in accordance with the requirements of the Safe Medical Devices Act (SMDA) of 1990 and 21 CFR 807.92. All data included in this document is accurate and complete to the best of KSEA's knowledge.

Submitter:	KARL STORZ Endoscopy-America, Inc. 2151 E. Grand Avenue EI Segundo, CA 90245
Contact:	Winkie Wong Regulatory Affairs Manager Phone: (424) 218-8379
Date of Preparation:	August 8th, 2020
Type of 510(k) Submission:	Traditional
Device Identification:	Trade Name: Flexible HD Video Rhino-Laryngoscope System Classification Name: Nasopharyngoscope (flexible or rigid) and accessories (21 CFR Part 874.4760)
Regulatory Class:	II
Product Code:	EOB
Guidance Document:	Not Applicable for EOB product codes
Recognized Consensus Standards:	9-114: IEC 60601-2-18: Edition 3.0 2009-08 Medical electrical equipment - Part 2-18: Particular requirements for the basic safety and essential performance of endoscopic equipment
Predicate Device(s):	Primary Predicate Device: KARL STORZ Endoscopy-America's CMOS Video Rhino Laryngoscope (K182186) Secondary Predicate Device: KARL STORZ Endoscopy-America's Flexible CMOS-Video- Rhino-Laryngoscope (K103467)
Device Description:	The components subject of this submission are: the Flexible HD Video-Rhino-Laryngoscope (Part Number: 11101 HD), and the IMAGE1 S CCU. The CCU consists of the IMAGE1 S Connect Module (Model Number: TC200US) and IMAGE1 S X-Link (Model Number: TC301US).
Intended Use:	The KARL STORZ Flexible HD Video Rhino-Laryngoscope System

<table>
<tr><td></td><td>is indicated for use by physicians for endoscopic diagnosis within the nasal lumens and airway anatomy. The endoscope is intended to provide visualization via a video monitor.</td></tr>
<tr><td>Indications For Use:</td><td>The KARL STORZ HD Video Rhino-Laryngoscope System is indicated to provide visualization of the nasal lumens and airway anatomy (including nasopharyngeal and trachea) during diagnostic procedures.</td></tr>
<tr><td>Technological Characteristics:</td><td>Comparison Table: Subject vs. Primary and Secondary Predicate Devices
<table>
<tr><th></th><th>Subject Device</th><th>Primary Predicate Device, K182186</th><th>Secondary Predicate Device, K103467</th></tr>
<tr><td colspan="4">Physical Characteristics</td></tr>
<tr><td>Type of Scope</td><td>Flexible</td><td>Same as the subject device</td><td>Same as the subject device</td></tr>
<tr><td>Insertion Shaft Diameter</td><td>3.7 mm</td><td>2.9 mm</td><td>Same as the subject device</td></tr>
<tr><td>Insertion Shaft Length</td><td>300 mm</td><td>Same as the subject device</td><td>Same as the subject device</td></tr>
<tr><td>Deflection</td><td>140° Up, 140° Down</td><td>Same as the subject device</td><td>Same as the subject device</td></tr>
<tr><td colspan="4">Optical Characteristics</td></tr>
<tr><td>Type of Imager</td><td>CMOS</td><td>Same as the subject device</td><td>Same as the subject device</td></tr>
<tr><td>Direction of View</td><td>0°</td><td>Same as the subject device</td><td>Same as the subject device</td></tr>
<tr><td>Light Source</td><td>Internal LED</td><td>Same as the subject device</td><td>Same as the subject device</td></tr>
<tr><td>Field of View</td><td>100°</td><td>Same as the subject device</td><td>85°</td></tr>
<tr><td>On-axis Resolution (minimal)</td><td>40 lp/mm@3 mm
2.5 lp /mm@50 mm</td><td>16 Lp/mm at 5 mm
1.8 Lp/mm at 50 mm</td><td>8.0 Lp/mm at 8 mm
1.4 Lp/mm at 50 mm</td></tr>
<tr><td colspan="4">Reprocessing Methods</td></tr>
<tr><td>Cleaning</td><td>Manual</td><td>Same as the subject device</td><td>Same as the subject device</td></tr>
<tr><td>Sterilization</td><td>Yes</td><td>Yes</td><td>Yes</td></tr>
<tr><td>HLD</td><td>Yes</td><td>Yes</td><td>Yes</td></tr>
</table></td></tr>
<tr><td>Non-Clinical Performance Data:</td><td>Electrical Safety and Electromagnetic Compatibility Summary
The electrical safety and EMC data included in the submission is in compliance with the following FDA recognized standards:
ANSI/AAMI ES:60601-1:2005/(R) 2012 and A1:2012
IEC 60601-1-2:2014
IEC 60601-2-18: 2009
Bench Testing Summary
The performance data submitted in the submission is in compliance with the following FDA recognized standards:
IEC 62471:2006
Optical Performance Testing:
Image Illumination Uniformity
Latency</td></tr>
</table>

	• Dynamic Range and Linearity • Signal to Noise Ratio & Sensitivity • Color Performance and Color Contrast Enhancement • System Resolution • Field of View • Distortion **Biocompatibility Summary** The biocompatibility evaluation for the patient contacting components of the neuroscope was performed according to ISO 10993-1 and FDA Guidance. The following tests were conducted based contact type and duration: • ISO 10993-5:2009/(R) 2014 • ISO 10993-10:2010 • ISO 10993-11:2006/(R) 2010 **Reprocessing Validation Summary** The Flexible HD Cysto-Urethroscope (Part Number: 11272V(H)) is provided non-sterile and is reusable. The users are required to reprocess it for initial and after each use. The subject device contacts intact mucosal membranes so it is a semi-critical device per Spaulding Classification. We performed validation activities for cleaning and sterilization according to the FDA Guidance. The reprocessing data submitted is in compliance with the following standards: • AAMI TIR 12:2010 • ISO 15883-5:2005 • AAMI TIR 30:2011 • AAMI/ANSI/ISO 11737-1:2006/ (R)2011 • ASTM E1837-96:2014
Clinical Performance Data:	Clinical testing was not required to demonstrate the substantial equivalence to the predicate devices. Non-clinical bench testing was sufficient to establish the substantial equivalence of the modifications.
Conclusion:	The conclusions drawn from the nonclinical tests demonstrate that the subject device, the Flexible HD Video-Rhino-Laryngoscope System is substantially equivalent to the legally marketed predicate devices.