



**JUL 15 2014**

**Endo Smart Bottle**

Section 05. 510(k) Summary

**Manufacturer:** Medivators, A Cantel Medical Company  
**Address:** 3150 Pollok Dr, Conroe, TX – 77303  
(963) 539-0391  
**Official Contact:** Kinnari Shah, MS  
Regulatory Affairs Specialist  
**Trade Name:** Endo Smart Bottle, Rinse and Insufflation System  
**Common Name:** Endoscopic Irrigation/Suction System  
**Classification Name:** Endoscope and accessories  
**Product Code:** OCX  
**Device Class:** II  
**Classification Regulation:** 876.1500

Medivators Inc. has supplied the following information to the US Food and Drug Administration to support substantial equivalence of Endo Smart Bottle, Rinse and Insufflation System to its predicate - Endoscope accessories – Endo Smart Cap.

**1. Device Description**

Endo Smart Bottle is designed to be attached to an endoscope, to help supply water, air/CO<sub>2</sub>. The device consists of a connector cap, a water bottle, a threaded cap, a small tube, and a male luer. The main function of the subject device is –

- To provide water for rinsing the lens.
- To provide air or CO<sub>2</sub> to insufflate the anatomical lumen, to help the end user to see the inner wall more clearly.

Similar to its predicate device, the subject device is provided sterile to the end user, fabricated from plastics, and elastomers, intended for daily (24 hour) multi-patient use and must be discarded daily. Both the subject device and its predicate device do not come in direct contact with patients.



**5. Conclusion**

Medivators has provided appropriate premarket notification information in the form of a 510(k) to support the substantial equivalence of Endo Smart Bottle to legally marketed predicate device. The information and performance data provided indicates that the Endo Smart Bottle is safe and effective for its intended use when used in accordance with the device labeling.

## 2. Intended Use

The EndoSmart Bottle is intended to be used with an air or CO2 source and/or a pump along with a sterile water source to supply air or CO2 and sterile water to an endoscope during endoscopic procedures.

## 3. Comparison to Other Devices in Commercial Distribution Within the United States

Endo SmartBottle is equivalent in function, intended use and technology to Medivators Endo SmartCap cleared under 510k – K093665. Endo SmartBottle is closely related to its predicate device - Endo SmartCap.

Both the predicate device and the subject device have the same intended use, principle of operation and scientific technology. Only difference between the 2 devices is – Endo Smart Bottle has concise tubing and an integrated water bottle unlike its predicate. Endo SmartCap and Endo Smart Bottle are daily (24 hour) disposable version of reusable analogues predicate of Endo SmartCap, this eliminating the risk of disinfection. A predicate device comparison table which supports substantial equivalence of Endo SmartBottle to its predicate is contained in the Substantial Equivalence section of this submission.

## 4. Summary of Non-Clinical Performance Data

Medivators has conducted the following conformance testing to demonstrate that Endo Smart Bottle has performance characteristics equivalent to its predicate Endo Smart Cap –

- Design Verification including functional testing –
  - Lens Rinsing Function
  - Insufflation Function
  - Safety
- Biocompatibility
  - Cytotoxicity Evaluation
  - Intracutaneous Irritation Test
  - Sensitization
- Shelf-life validation
  - Functional Testing
  - Dye Penetration Testing
  - Peel Strength Testing
  - Visual Seal Inspection
- Sterilization validation



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Center - WO66-G609  
Silver Spring, MD 20993-0002

July 15, 2014

Medivators, Inc.  
Kinnari Shah  
Regulatory Affairs Specialist  
14605 28<sup>th</sup> Ave N  
Minneapolis, MN 55447

Re: K140753  
Trade/Device Name: Endo Smart Bottle System  
Regulation Number: 21 CFR§ 876.1500  
Regulation Name: Endoscope and Accessories  
Regulatory Class: II  
Product Code: OCX  
Dated: March 25, 2014  
Received: March 26, 2014

Dear Kinnari Shah,

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. 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); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to <http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOices/ucm115809.htm> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

**Benjamin R. Fisher -S**

Benjamin R. Fisher, Ph.D.  
Director  
Division of Reproductive, Gastro-Renal,  
and Urological Devices  
Office of Device Evaluation  
Center for Devices and Radiological Health

Enclosure

**Indications for Use**

510(k) Number (if known)  
K140753

Device Name  
Endo Smart Bottle

Indications for Use (Describe)

The EndoSmart Bottle is intended to be used with an air or CO2 source and/or a pump along with a sterile water source to supply air or CO2 and sterile water to an endoscope during endoscopic 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)

**PLEASE DO NOT WRITE BELOW THIS LINE -- CONTINUE ON A SEPARATE PAGE IF NEEDED.**

**FOR FDA USE ONLY**

Concurrence of Center for Devices and Radiological Health (CDRH) (Signature)

Benjamin R. Fisher, S  
2014.07.15 11:11:52-0400'

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