



Food and Drug Administration  
10903 New Hampshire Avenue  
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Silver Spring, MD 20993-0002

September 23, 2014

Biospace Corporation Limited  
% Daniel Kamm  
Principal Engineer  
Kamm & Associates  
8870 Ravello Ct  
Naples, FL 34114

Re: K141483  
Trade/Device Name: Biospace Body Composition Analyzers, Model InBody770,  
InBody570, InBody S10, InBody230  
Regulation Number: 21 CFR§ 870.2770  
Regulation Name: Impedance plethysmograph  
Regulatory Class: II  
Product Code: MNW  
Dated: August 19, 2014  
Received: August 22, 2014

Dear Daniel Kamm,

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/CDRHOffices/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)

K141483

Device Name

Biospace Body Composition Analyzers, Model InBody770, InBody570, InBody S10, InBody230

Indications for Use (Describe)

For use only in healthy subjects for Measurement of:

Estimated: Skeletal Muscle Mass, Extra-Cellular Water (ECW), Intra-Cellular Water (ICW), Total Body Water (TBW), ECW/TBW, Body Fat, Percentage of Body Fat (PBF), Body Lean + Dry Lean, Metabolic Rates(Basal Metabolic Rates), Segmental Lean Mass, Segmental Fat Mass, % Segmental Body Fat, Energy Expenditure of Activity, Visceral Fat Area (VFA), Visceral Fat Level, Segmental Body Water, Percent Body Water, Body Shape Graph, Weight Control, Fat Control, Muscle Control, Segmental ECW/TBW, Segmental ECW, Segmental ICW, TBW/LBM, Leg Lean Mass, Fitness Score, AC (Arm Circumference)

Actual: Weight, Body Mass Index (BMI) and Impedance Values, Height [which can require the entry of Height], Resistance Values [only for InBody770, InBody S10], Reactance Values [only for InBody770, InBody S10], Phase Angle [only for InBody770, InBody S10]

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)

This section applies only to requirements of the Paperwork Reduction Act of 1995.

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**510(k) Summary K141483**  
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**Homepage : <http://www.inbody.com>**  
**DATE PREPARED: May 22, 2014**  
**Contact: Kichul Cha, CEO**

1. Identification of the Devices: Proprietary-Trade Names:  
Biospace Body Composition Analyzer, Model InBody770  
Biospace Body Composition Analyzer, Model InBody570  
Biospace Body Composition Analyzer, Model InBody S10  
Biospace Body Composition Analyzer, Model InBody230  
Classification Names: ANALYZER, BODY COMPOSITION  
Common/Usual Name: Body fat meter  
Regulation Description: Impedance plethysmograph.  
Classification Panel: Cardiovascular  
Product Code: MNW  
Regulation Number: 870. 2770  
Classification: II
2. Equivalent legally marketed devices: (Predicate device Information)  
Biospace Body Composition Analyzer Model InBody 170, InBody J30 InBody S10,  
K110689 The Segmental Body Water indication was cleared in K123228, InBody 770,  
InBody570, InBodyS10, InBody H20.
3. **Indications for Use:**  
For use only in healthy subjects for Measurement of:  
Estimated: Skeletal Muscle Mass, Extra-Cellular Water (ECW), Intra-Cellular Water (ICW), Total  
Body Water (TBW), ECW/TBW, Body Fat, Percentage of Body Fat (PBF), Body Lean + Dry Lean,  
Metabolic Rates(Basal Metabolic Rates), Segmental Lean Mass, Segmental Fat Mass, %  
Segmental Body Fat, Energy Expenditure of Activity, Visceral Fat Area (VFA), Visceral Fat Level,  
Segmental Body Water, Percent Body Water, Body Shape Graph, Weight Control, Fat Control,  
Muscle Control, Segmental ECW/TBW, Segmental ECW, Segmental ICW, TBW/LBM, Leg Lean  
Mass, Fitness Score, AC (Arm Circumference)  
  
Actual: Weight, Body Mass Index (BMI) and Impedance Values, Height [which can require the  
entry of Height], Resistance Values [only for InBody770, InBody S10], Reactance Values [only for  
InBody770, InBody S10], Phase Angle [only for InBody770, InBody S10]
4. **Description:** Impedance plethysmographic devices are used to estimate peripheral blood flow  
by measuring electrical impedance changes in a region of the body such as the arms and legs.  
Multi-frequency and segmental bioelectrical impedance analysis can estimate the distribution of  
body water (total body water; intra-cellular water; extra-cellular water), and can correlate with fluid  
compartmentalization. Assuming that body lean mass is hydrated in a constant and uniform  
manner; bioelectrical impedance analysis can be used to estimate body lean mass and fat mass.

These devices are impedance plethysmograph body composition analyzers. These devices

determine body composition parameters based on bioelectrical impedance analysis (BIA). BIA relies on the differing behavior of biological tissues in response to an applied electrical current. Lean tissue is generally highly conductive because it contains large amounts of bound water and electrolytes, while fat tissue and bone are relatively poor conductors. By analyzing the response to electrical signals, BIA thereby permits differentiation of lean tissue, fat, and water and, in some instances, derivation of related body composition parameters. The total impedance resulting from BIA incorporates both resistance and capacitance components. Impedance plethysmographic devices are used to estimate peripheral blood flow by measuring electrical impedance changes in a region of the body such as the arms and legs. Multi-frequency and segmental bioelectrical impedance analysis can estimate the distribution of body water (total body water; intra-cellular water; extra-cellular water), and can correlate with fluid compartmentalization. Assuming that body lean mass is hydrated in a constant and uniform manner; bioelectrical impedance analysis can be used to estimate body lean mass and fat mass. Body composition analysis results may be of value to health care professionals in their management of the relative balance and levels of fat and lean tissue

**5. Safety and Effectiveness, comparison to predicate device.** The results of bench, safety, and software testing indicates that the new devices are as safe and effective as the predicate device.

**6. Comparison table**

Devices		InBody 170	InBody J30	InBody S10	InBody 770 (new)	InBody 570 (new)	InBody S10 (new)	InBody 230 (new)
510(k) number		K110689	K110689	K110689	New	New	New	New
Manufacturer		Biospace	Biospace	Biospace	Biospace	Biospace	Biospace	Biospace
Measurement of Estimated :	Extra-Cellular Water (ECW)	√	√	√	√	√	√	√
	Intra-Cellular Water(I CW)	√	√	√	√	√	√	√
	Total Body Water (TBW)	√	√	√	√	√	√	√
	Skeletal Muscle Mass	√	√	√	√	√	√	√
	Body Fat Mass	√	√	√	√	√	√	√
	Lean Body Mass	√	√	√	√	√	√	√
	Dry Lean Mass	√	√	√	√	√	√	√
	Basal Metabolic Rates	√	√	√	√	√	√	√

Devices		InBody 170	InBody J30	InBody S10	InBody 770 (new)	InBody 570 (new)	InBody S10 (new)	InBody 230 (new)
	Segmental Lean Mass	√	√	√	√	√	√	√
	ECW/TBW	√	√	√	√	√	√	√
	Segmental Body Fat mass	√	√	√	√	√	√	√
	% Segmental Body Fat	√	√	√	√	√	√	√
	Energy expenditure of activity	√	√	√	√	√	√	√
	Visceral Fat Area	√	√	√	√	√	√	√
	Segmental Body Water			√	√	√	√	
Measurement of Actual :	Weight	√	√		√	√		√
	Height		√					
	Body Mass Index (BMI)	√	√	√	√	√	√	√
	Impedance Values	20, 100kHz	5, 50, 250kHz	1, 5, 50, 250, 500, 1,000kHz	1, 5, 50, 250, 500, 1,000kHz	5, 50, 500kHz	1, 5, 50, 250, 500, 1,000kHz	20, 100kHz
	Reactance Values			5,50,250k Hz	5,50,250k Hz		5,50,250k Hz	
	Phase Angle			5,50,250k Hz	5,50,250k Hz		5,50,250k Hz	
Measurement method		Bioelectric Impedance						
Electrode type		4 electric poles 8 points Touch type electrode measurement	4 electric poles 8 points Touch type electrode measurement	4 electric poles 8 points Touch type electrode measurement	4 electric poles 8 points Touch type electrode measurement	4 electric poles 8 points Touch type electrode measurement	4 electric poles 8 points Touch type electrode measurement	4 electric poles 8 points Touch type electrode measurement

Devices	InBody 170	InBody J30	InBody S10	InBody 770 (new)	InBody 570 (new)	InBody S10 (new)	InBody 230 (new)
Power Source	Input power: AC 100-120/200-240V, 50/60Hz, 1.2A Output power: DC12V, 3.4A	Input power: AC 100-120/200-240V, 50/60Hz, 1.2A Output power: DC12V, 3.4A	Input power: AC 100-120/200-240V, 50/60Hz, 1.2A Output power: DC12V, 3.4A	Input power: AC 100-120/200-240V, 50/60Hz, 1.2A Output power: DC12V, 3.4A	Input power: AC 100-120/200-240V, 50/60Hz, 1.2A Output power: DC12V, 3.4A	100-240V~, 50/60Hz  No adapter	Input power: AC 100-120/200-240V, 50/60Hz, 1.2A Output power: DC12V, 3.5A
Equipment weight	14.3kg	29kg	2kg	5.7kg	20 kg	45kg	26kg
Equipment size	396(W) x 608(L) x 955(H) : mm	360(W) x 640(L) x 2235(H) : mm	202(W) x 322(L) x 53(H) : mm	393(W) x 516(L) x 732(H) : mm	460(W) x 677(L) x 1020(H) : mm	520(W) x 870(L) x 1200(H) : mm	522 (W) x 843(L) x 1015(H) : mm
Measurement time	30 seconds	30 seconds	110 seconds	Weight measurement 3~5 seconds, Impedance measurement 5~7 seconds.	45 seconds	Less than 1 minute for medical mode(Less than 2 minutes for research purpose mode)	50 seconds
Measurement age	From age 3 ~ age 99	From age 3 ~ age 99					
Measurement weight	10 ~ 250kg	10 ~ 250kg	10 ~ 250kg	5 ~ 250kg	10 ~ 250kg	10 ~ 250kg	10 ~ 250kg

7. Discussion of Non-Clinical Testing: Electromagnetic and Safety Testing was conducted to IEC 60601-1 and IEC 60601-1-2. Software validation was conducted. Literature was compiled and reviewed.
8. Discussion of Clinical Testing: We conducted clinical testing on each model and compared the results to a predicate. Approximately 80 patients aged 6 to mid 60’s, both males and females, were tested. The correlation coefficients for all four new units were very nearly 1.00 showing excellent correlation.
9. Conclusion: As compared to our predicate devices (our own brand) these new models have very similar technological characteristics and performed comparably to our predicates. The same scientific principles are used to produce the measurements. We therefore conclude that our new models are substantially equivalent to our predicate previously cleared. The new devices are therefore substantially equivalent to our predicates.