

## 510(k) SUMMARY

Submitted For: BIO PROTECH INC. NOV 7 2002  
303 Boryung B/D 37-10  
Kangnam Ku,  
Seoul, Korea 135-090

Submitted by: TUCKER & ASSOCIATES  
Official Correspondent and United States Agent for  
Bio Protech Inc.  
JANNA P. TUCKER, President – CEO  
198 Avenue de la D'emerald  
Sparks, NV 89434  
Phone: 775-342-2612 Fax: 775-342-2613  
E-mail: [Tuckerjan@aol.com](mailto:Tuckerjan@aol.com)

Date of Submission:

Classification Name: ELECTRODE, ELECTROCARDIOGRAPH  
Product Code: DRX  
Class II Device

Proprietary Name: (Multiple Labels) Telectrode ECG Electrode

Common Name: ECG Electrode

Regulatory Reference: CFR 870.2360

Predicate Device: Skintact™ ECG Electrodes (K982521)

Labels/Labeling: This device will be marketed to medical device suppliers,  
Dentist and Doctor Offices, Clinics, Emergency Response  
Professionals, Hospitals and other healthcare professionals  
for the Intended Use purposes below, and will be  
appropriately labeled in accordance with Title 21 CFR  
Part 801.

Intended Use: An electrocardiograph electrode is the electrical conductor  
which is applied to the surface of the body to transmit the  
electrical signal at the body surface to a processor that  
produces an electrocardiogram or vectorcardiogram.

- Description:** Bio Protech electrodes are self-adhesive, non-sterile, single use disposable ECG electrodes. All include an Ag/AgCl sensing element and the solid adhesive hydro gel has very low impedance level. Most importantly, the adhesive gel sticks on both skin of patient and the sensing element so that the movement artifact can be significantly lowered. The adhesive qualities of the foam is strong enough to use for stress test and holter.
- Substantial Equivalence:** This device is equivalent to those in commercial distribution for use in general electrocardiographic procedures where ECG monitoring is deemed necessary and is ordered by a physician.
- Both in its intended use and/or physical characteristics, this device is equivalent to devices currently marketed by U.S. companies. It is **substantially equivalent** to the device manufactured by Leonhard Lang GmbH under K982521.
- Performance Summary:** The electrical performance of BIO PROTECH ECG electrodes meets the requirements of the Medical Devices Directive: EU Council Directive 93/42/EEC, ANSI/AAMI ec12-2000, and has been issued a Certificate of Conformity (01-KOR-MDD-0003)
- Biocompatibility Testing:** The biological safety of the PRO TECH ECG electrodes has been assured through the selection of materials which demonstrate appropriate levels of biocompatibility. The tests were selected on the basis of ISO 10993-1, Biological Evaluation of Medical Devices – Part 1 – Guidance on selection of tests.
- Shelf Life:** Data obtained in real time shelf life studies was reviewed and found to substantiate the 24 month shelf life claim.
- Conclusion:** This device is substantially equivalent to the device approved as K982521.



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

NOV 7 2002

Bio ProTech, Inc.  
c/o Ms. Janna P. Tucker  
Official Correspondent  
Tucker & Associates  
198 Avenue De La D'emerald  
Sparks, NV 89434-9550

Re: K020003

Trade Name: Electrocardiograph (ECG) Electrode  
Regulation Number: 21 CFR 870.2360  
Regulation Name: Electrocardiograph Electrode  
Regulatory Class: Class II (two)  
Product Code: DRX  
Dated: August 6, 2002  
Received: August 9, 2002

Dear Ms. Tucker:

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.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such 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.

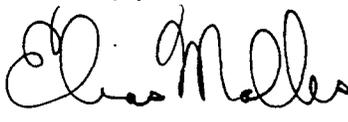
Page 2 – Ms. Janna P. Tucker

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); 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.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 21 CFR Part 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4646. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address <http://www.fda.gov/cdrh/dsma/dsmamain.html>

Sincerely yours,

  
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Bram D. Zuckerman, M.D.  
Director  
Division of Cardiovascular Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

**INDICATIONS FOR USE**

**APPLICANT:** **BIO PROTECH, INC.**

**510(k) NUMBER:** K 020003

**DEVICE NAME:** **ELECTROCARDIOGRAPH (ECG)  
ELECTRODE**

ECG electrodes are used to record the following ECGs from a patient: Resting ECG, Exercise ECG and/or ambulatory (Holter) monitoring.

The intended patient population can be adult, pediatric and neonatal, while the environment of use can be hospital (or clinic), ambulance, or daily use environment (for Holter monitoring).

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

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Concurrence of CDRH, Office of Device Evaluation (ODE)

*E. Melli*

Division of Cardiovascular & Respiratory Devices  
510(k) Number K020003

Prescription Use X  
(Per 21 CFR 801.109)

OR

Over-The-Counter Use \_\_\_\_\_

(Optional Format 1-2-96)

*EXHIBIT B  
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