K110705

APR 14 2011

510(K) SUMMARY

In accordance with 21 CFR 807.92 the following summary of information is provided:

March 11, 2011

SUBMITTER:

Advanced Brain Monitoring
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PRIMARY CONTACT PERSON:

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Founder
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T 262-290-0023

SECONDARY CONTACT PERSON:

Dan Levendowski
President and Co-founder
Advanced Brain Monitoring, Inc.

DEVICE:

TRADE NAME: Apnea Risk Evaluation System (ARES™), Model 610

COMMON/USUAL NAME: ARES

CLASSIFICATION NAMES: 868.2375 Ventilatory Effort Recorder

PRODUCT CODE: MNR

PREDICATE DEVICE(S):

K071230 Apnea Risk Evaluation System (ARES), Model 600

DEVICE DESCRIPTION:

The Apnea Risk Evaluation System (ARES™) includes a device called a Unicorder which records oxygen saturation, pulse rate, snoring level, head movement and head position, airflow, and a physiological signal from the forehead used to stage sleep. The battery powered Unicorder provides sufficient capacity to record two nights of data. The device monitors signal quality during acquisition and notifies the user via voice messages when adjustments are required.

A standard USB cable connects the Unicorder to a USB port on a host computer when patient data is to be uploaded or downloaded. The USB cable provides power to the Unicorder during recharging from the host computer or from a USB wall charger. The Unicorder cannot record nor can it be worn by the patient when connected to the host computer or the wall charger.

Software controls the uploading and downloading of data to the Unicorder, processes the sleep study data and generates a sleep study report. The ARES can auto-detect positional and non-positional obstructive and mixed apneas and hypopneas similarly to polysomnography. It can detect sleep/wake and REM and non-REM.

After the sleep study has been completed, data is transferred off the Unicorder and the Unicorder is prepared for the next study. The downloaded sleep study record is then processed with the ARES™ Insight software to transform the raw signals and derive and assess changes in oxygen saturation (SpO_2), pulse rate, head movement, head position, snoring sounds, airflow, and EEG. The red and IR signals are used to calculate the SpO_2 and pulse rate. The actigraphy signals are transformed to obtain head movement and head position.

ARES™ Screener can predict pre-test probability of obstructive sleep apnea (OSA). The ARES can assist the physician to identify patients who will likely have a successful OSA treatment outcome, including CPAP and oral appliance therapies. ARES™ can also help identify patients who would benefit from a laboratory PAP titration.

INTENDED USE:

The Apnea Risk Evaluation System (ARES™) is indicated for use in the diagnostic evaluation by a physician of adult patients with possible sleep apnea. The ARES™ can record and score respiratory events during sleep (e.g., apneas, hypopneas, mixed apneas and flow limiting events). The device is designed for prescription use in home diagnosis of adults with possible sleep-related breathing disorders.

TECHNOLOGY:

The Apnea Risk Evaluation System (ARES™), Model 610 uses the same fundamental technology as the ARES™ Model 600. The ARES™ Model 610 is a modified version of the ARES™ Model 600. Modifications have been made to the Unicorder and include use of a USB chip to increase the data transfer speed between the computer and the device, use of micro-SD memory, and a change in interface material between the enclosure and forehead from foam to silicone. Firmware changes were made in association with these hardware changes.

DETERMINATION OF SUBSTANTIAL EQUIVALENCE:

COMPARISON TO PREDICATE DEVICES

The ARES™ Model 610 has the same intended use as the ARES™ Model 600. All features are identical except those described in the table below.

Characteristic	ARES Model 610	ARES Model 600
Data Storage	Micro-SD memory card	MMC-micro memory card
Data storage capacity	128 MB	2 GB
Data transfer	Native USB	FTDI protocol
Data Transfer Rate	4 - 8 MB per minute	>256 MB per minute
Stabilizing straps	Santoprene	Vinyl
Forehead Pad	Silicone – combined with enclosure pad	Foam
Enclosure Pad	Silicone	Felt and Foam

SUMMARY OF NON-CLINICAL TESTS:

Support for the substantial equivalence of the ARES™ Unicorder (Model 610) was provided as a result of risk management and testing which included electrical and biological safety, performance and software tests. This testing includes conformity to FDA recognized consensus standards and voluntary standards as follows:

Standard Number	**Standard Title**
IEC 60601-1-1:1988+A1: 1991+A2: 1995	Medical Electrical Equipment – Part 1: General requirements for safety
IEC 60601-1-2: 2007	Medical Electrical Equipment Part 1-2: Collateral standard: Electromagnetic compatibility – requirements and tests
ISO 10993-1: 2009	Biological evaluation of medical devices Part 1
ISO AAMI TIR 30: 2003	A compendium of processes, materials, test methods, and acceptance criteria for cleaning reusable medical devices
ISO AAMI TIR 12: 2010	Designing, testing, and labeling reusable medical devices for reprocessing in health care facilities: A guide for medical manufacturers

Additional verification and validation testing confirmed:

- The ARES™ 610 hardware and firmware met the system requirements.
- All features of the Model 610 were compliance with the system level requirements.

SUMMARY OF CLINICAL TESTS:

Twenty overnight sleep studies were conducted on 14 subjects in the home to confirm the stabilizing strap and enclosure pad for Model 610 provided equivalent signals as compared to the Model 600. Comfort and the pressure applied to the forehead sensor were the measures used in the evaluation. Results demonstrated equivalent performance of the ARES™ Model 610 as compared to Model 600.

CONCLUSION:

The conclusions drawn from the nonclinical and clinical tests demonstrate equivalent performance of the Apnea Risk Evaluation System (ARES™), Model 610 and the legally marketed device, Apnea Risk Evaluation System (ARES™), Model 600. The Apnea Risk Evaluation System (ARES™), Model 610 is substantially equivalent to the predicate device.

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

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

Advanced Brain Monitoring, Incorporated
C/O Ms. Adrienne Lenz
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APR 1 4 2011

Re: K110705
Trade/Device Name: Apnea Risk Evaluation System (ARES), Model 610
Regulation Number: 21 CFR 868.2375
Regulation Name: Breathing Frequency Monitor
Regulatory Class: II
Product Code: MNR
Dated: March 11, 2011
Received: March 14, 2011

Dear Ms. Lenz:

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,

Anthony D. Watson

Anthony D. Watson, B.S., M.S., M.B.A.
Division Director
Division of Anesthesiology, General Hospital,
Infection Control and Dental Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

APNEA RISK EVALUATION SYSTEM (ARES™), MODEL 610

510(k) Number (if known):

Device Name: Apnea Risk Evaluation System (ARES™)

Indications for Use:

The Apnea Risk Evaluation System (ARES™), Model 610 is indicated for use in the diagnostic evaluation by a physician of adult patients with possible sleep apnea. The ARES™ can record and score respiratory events during sleep (e.g., apneas, hypopneas, mixed apneas and flow limiting events). The device is designed for prescription use in home diagnosis of adults with possible sleep-related breathing disorders.

Prescription Use__X___ AND/OR Over-The-Counter Use__

(Part 21 CFR 801 Subpart D) (Part 21 CFR 801 Subpart C)

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

(Division Sign-Off)
Division of Anesthesiology, General Hospital
Infection Control, Dental Devices

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