

SUMMARY OF SAFETY AND EFFECTIVENESS
for HIVOX Electric Stimulator OTC TENS**MAR 19 2012**510(k) : K112392

DATE OF SUBMISSION: July 13, 2011

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TRADE NAME: HIVOX Electric Stimulator OTC TENS
Pennypad 904 and Pennypad 909 : OTC TENS – Lower Back pain relieve
Pennypad 907: OTC TENS – Arm and Leg pain relief

COMMON/USUAL NAME: Stimulator, Nerve, Transcutaneous, Over-The-Counter

CLASSIFICATION NAME: Transcutaneous Nerve Stimulator

REGULATION NUMBER: NUH, Class II, 882.5890

SECONDARY PRODUCT CODE: GZJ, Class II, 882.5890

PREDICATED DEVICE: Therapeutic Massage Companion, Endurance Therapeutics
1) K060846, OTC TENS for Lower Back, Arm and Leg Pain Relief, T1040
WELL-LIFE Healthcare Limited
2) K040512, Limited Function OTC TENS, for Lower Back Pain Relief, WL-2402, WL-2403

Intended Use:	<p>The HIVOX Electric Stimulator OTC TENS, Pennypad 904 and Pennypad 909 are indicated for temporary relief of pain associated with sore and aching muscles in the lower back due to strain from exercise or normal household and work activities.</p> <p>The HIVOX Electric Stimulator OTC TENS, Pennypad 907 is indicated for Arm & Leg Pain Relief is intended for temporary relief of pain associated with sore and aching muscles in the upper and lower extremities (arm and/or leg) due to strain from exercise or normal household and work activities.</p>
Description of Device:	<p>The HIVOX Electric Stimulator OTC TENS, Pennypad 904, Pennypad 907, and Pennypad 909 can generate small pulses of electrical current. Delivered these pulses pass through the skin and activated underlying nerves.</p>
Performance Tests Submitted:	<p>The relevant standards including:</p> <ol style="list-style-type: none">1. IEC/EN 60601-1 : Medical electrical equipment Part 1. General requirements for safety, 1996.2. IEC/EN 60601-1-2 : Medical electrical equipment, Part 2. Electromagnetic compatibility – Requirements and tests, 2007.3. IEC/EN 60601-2-10 : Medical electrical equipment, Part 2-10: Particular requirements for safety of nerve and muscle stimulators, 2001.
Non-Clinical Tests Submitted:	<p>The HIVOX Electric Stimulator OTC TENS, Pennypad 904, Pennypad 907, and Pennypad 909 have been tested in accordance with applicable standards for medical device electrical safety, electromagnetic compatibility, and the particular requirements for safety of nerve stimulators.</p> <p>Accessories also meet safety requirements: 510(k) electrodes are specified the safety requirements.</p> <p>System level testing including waveform testing was performed in combination the HIVOX Electric Stimulator OTC TENS.</p>
Clinical Tests Submitted:	<p>None</p>
Conclusion:	<p>As the product description and tests as above, the new devices: HIVOX Electric Stimulator OTC TENS, Pennypad 904, Pennypad 907, and Pennypad 909 are as safe and effective as, and the function in a manner equivalent to the predicate devices: K060846, OTC TENS for Lower Back, Arm and Leg Pain Relief, T1040; and K040512, Limited Function OTC TENS, for Lower Back Pain Relief, WL-2402, WL-2403.</p> <p>Thus the new device is substantially equivalent to the predicate devices in this aspect.</p>

Comparison for Predicate Device & Subject Device

● COMPARISON TABLE 1

We present the relevant information for the predicate device here for demonstrating the characteristics of the predicate device.

Parameter		HIVOX		Well Life (K)040512	Endurance Therapeutics (K)060846
Mode or Program Name		PP909	PP904	2402/2403	T1040
Waveform		Symmetrical Biphasic		Biphasic	Biphasic
Shape		Rectangular		Rectangular	Rectangular
Maximum Output Voltage (Volts) ($\pm 20\%$)	@500 Ω	40.0Vpp	57.6Vpp	38.2V rms	40.7V
	@2K Ω	84.0Vpp	89.6Vpp	52.8V rms	105.1V
	@10K Ω	92.0Vpp	96.0Vpp	84.8V rms	154.1V
Maximum Output Current ($\pm 20\%$)	@500 Ω	80.0mApp	115.2mApp	76.2mA rms	81.4mA
	@2K Ω	42.0mApp	44.8mApp	52.8mA rms	47.8mA
	@10K Ω	9.2mApp	9.6mApp	8.48mA rms	15.4mA
Duration of primary (depolarizing) phase (μ Sec)		NA		NA	NA
Pulse Duration (μ Sec)		200 μ Sec (fixed)		250 μ Sec	4.1~500mS
Frequency (Hz)		35	2, 5, and 40	25Hz	245Hz
Net Charge (μ C) per pulse	@500 Ω	0.3200	0.2304	16.0/8.76	4.07
Maximum Charge (μ C)	@500 Ω	16.0	23.04	12.5/9.2	16.9
Maximum Current Density (mA/cm ² , r.m.s.)	@500 Ω	1.964	2.828	0.006	2.71
Maximum Average Power Density (W/cm ²)	@500 Ω	0.078	0.163	0.000848/ 0.002292	5.35 (mW/cm ²)
Burst Mode	a. Pulse per burst	1	NA	NA	NA
	b. Burst per second	4	NA	NA	NA
	c. Burst duration (sec)	2	NA	NA	NA
	d. Duty Cycle	8	NA	NA	NA
ON Time(sec)		120		NA	NA
Off Time(sec)		0		NA	NA
Additional Features		NA		NA	NA

Note: The subject device only Pennypad 909 has the "Burst Mode".

Formula

Current Density – ((Max Voltage@500ohm)x1000)/electrode area (40.732cm²)

Power Density – (Amp x V)/ Electrode Area(40.732cm²)

● COMPARISON TABLE 2

We present the relevant information for the predicate device here for demonstrating the characteristics of the predicate device.

Parameter		HIVOX	Endurance Therapeutics (K)060846
Mode or Program Name		PP907	T1040
Waveform		Symmetrical Biphasic	Biphasic
Shape		Rectangular	Rectangular
Maximum Output Voltage (Volts) ($\pm 20\%$) Peak to peak	@500 Ω	68.8V	40.7V rms
	@2K Ω	88.0V	105.1V rms
	@10K Ω	95.2V	154.1V rms
Maximum Output Current($\pm 20\%$) Peak to peak	@500 Ω	137.6mA	81.4mA rms
	@2K Ω	44.0mA	47.8mA rms
	@10K Ω	9.52mA	15.4mA rms
Duration of primary (depolarizing) phase (μ Sec)		NA	NA
Pulse Duration (μ Sec)		200 μ Sec (fixed)	4.1~500mS
Frequency (Hz)		2 and 40	245Hz
Net Charge (μ C) per pulse	@500 Ω	1.1008	4.07
Maximum Charge (μ C)	@500 Ω	27.52	16.9
Maximum Current Density (mA/cm ² , r.m.s.)	@500 Ω	3.378	2.71
Maximum Average Power Density (W/cm ²)	@500 Ω	0.232	5.35 (mW/cm ²)
Burst Mode	a. Pulse per burst	NA	NA
	b. Burst per second	NA	NA
	c. Burst duration (sec)	NA	NA
	d. Duty Cycle	NA	NA
ON Time(sec)		120	NA
Off Time(sec)		0	NA
Additional Features		NA	NA

Formula:

Current Density – ((Max Voltage@500ohm)x1000)/electrode area (40.732cm²)

Power Density – (Amp x V)/ Electrode Area(40.732cm²)

DISCUSSION:

The HIVOX Electric Stimulator OTC TENS, Pennypad 904, Pennypad 907, and Pennypad 909 have the same visual appearance, software, and dimensions (113 * 70 * 9.7 mm) the main difference is:

- Pennypad 904 and Pennypad 909 : OTC TENS – Lower Back pain relieve
- Pennypad 907: OTC TENS – Arm and Leg pain relief
- Only Pennypad 909 has the “Burst Mode”.

As the product description and tests as above, the new devices: HIVOX Electric Stimulator OTC TENS, Pennypad 904, Pennypad 907, and Pennypad 909 are as safe and effective as, and the function in a manner equivalent to the predicate devices: K060846, **OTC TENS** for Lower Back, Arm and Leg Pain Relief, T1040; and K040512, Limited Function **OTC TENS**, for Lower Back Pain Relief, WL-2402, WL-2403.. Thus the new devices are substantially equivalent to the predicate devices in this aspect.



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MAR 19 2012

Re: K112392

Trade/Device Name: HIVOX Electric Stimulator OTC TENS

Models: Pennypad 904, 909 – Lower back pain relief

Pennypad 907 – Arm and Leg pain relief

Regulation Number: 21 CFR 882.5890

Regulation Name: Transcutaneous Electrical Nerve Stimulator for Pain Relief

Regulatory Class: Class II

Product Code: NUH

Dated: February 24, 2012

Received: March 8, 2012

Dear Dr. Jen:

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,



Malvina B. Eydelman, M.D.

Director

Division of Ophthalmic, Neurological,
and Ear, Nose and Throat Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

Indications for Use

510(k) Number: K112392

Device Name: HIVOX Electric Stimulator OTC TENS
Pennypad 904, 909 : OTC TENS – Lower back pain relieve
Pennypad 907: OTC TENS – Arm and Leg pain relief

Indications for Use :

The Pennypad 904 and Pennypad 909 are indicated for temporary relief of pain associated with sore and aching muscles in the lower back due to strain from exercise or normal household and work activities.

The Pennypad 907 is indicated for Arm & Leg Pain Relief is intended for temporary relief of pain associated with sore and aching muscles in the upper and lower extremities (arm and/or leg) due to strain from exercise or normal household and work activities.

Prescription Use _____ AND/OR Over-The-Counter Use √
(Part 21 CFR 801 Subpart D) (21 CFR 807 Subpart C)

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

Concurrence of CDRH Office of Device Evaluation (ODE)

John Callaway
(Division Sign-Off)

Division of Ophthalmic, Neurological and Ear,
Nose and Throat Devices

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