

**Non-Confidential Summary of Safety and Effectiveness**

O-Two Medical Technologies  
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Canada  
Tel – 905-677-9410

**Official Contact:** Ammar Al-Dojaily

**Application Date:** Aug. 24, 2011

**Proprietary or Trade Name:** o\_two CPAP System

**Common/Usual Name:** CPAP device

**Classification Name:** Positive End Expiratory Pressure Breathing Apparatus  
(21 CFR 868.5965, product code: BYE)

**Device Class:** Class II

**Classification Panel:** Anesthesiology

**Predicate Devices:** CAREvent Handheld CPAP System

- Manufactured by O-Two Medical Technologies Inc.
- 510(k) number K093862

Boussignac CPAP Device

- Manufactured by Vygon S. A.
- 510(k) number K013884

**Device Description:**

The o\_two CPAP device provides a constant positive airway pressure to the lungs of patients in respiratory distress from Pulmonary Emphysema, Congestive Heart Failure and a number of other obstructive airway conditions. This open system has no moving parts and uses a "vectored flow valve" to create a wall of resistance to expiration and an additive flow to inspiration. By varying the oxygen flow through the valve the baseline pressure can be raised or lowered to maintain a positive airway pressure. The rise in baseline pressure keeps alveoli from collapsing, forces fluid in the lungs back into the interstitium and improves medication delivery.

The device is a restricted medical device intended for use by qualified medical personnel under the direction of a physician.

**Indications for Use:**

o\_two CPAP System is intended to provide a constant positive airway pressure to spontaneously breathing patients in the hospital environment and emergency medical service applications to treat patients in respiratory distress.

**Patient Population:**

Spontaneous breathing adult and pediatric patients requiring respiratory support.

**Contraindications:**

- Patients undergoing procedures with flammable anesthetic gases;
- Patients undergoing hyperbaric treatment.

**Comparative table:**

Characteristic	O_two CPAP System	Boussignac CPAP Device (K013884)	CAREvent Handheld CPAP System (K093862)
Intended Use	o_two CPAP System is intended to provide a constant positive airway pressure to spontaneously breathing patients.	The Boussignac B C. P.A. P. Device is intended to provide CPAP to spontaneously breathing patients.	Provide constant positive airway pressure for spontaneous breathing patients require respiratory support
Environments of use	Hospital, pre-hospital (EMS) environments	Hospital and pre-hospital environment.	Hospital, pre-hospital (EMS) environments
Patient population	Spontaneous breathing adult and pediatric patients	Spontaneous breathing adult and pediatric patients	Spontaneous breathing adult and pediatric patients
Operating principles	An open system with no moving parts and uses a "vectored flow valve" to create a wall of resistance to expiration and an additive flow to inspiration. By varying the oxygen flow through the valve the baseline pressure can be raised or lowered to maintain a positive airway pressure. The rise in baseline pressure keeps alveoli from collapsing, forces fluid in the lungs back into the interstitium and improves medication delivery.	An open system with no moving parts and uses a "virtual valve" to create a wall of resistance to expiration and an additive flow to inspiration. By varying the oxygen flow through the valve the baseline pressure can be raised or lowered to maintain a positive airway pressure. The rise in baseline pressure keeps alveoli from collapsing, forces fluid in the lungs back into the interstitium and improves medication delivery.	Pneumatic, demand flow system

Input range	0-25 L/min variable flow source	0-25 L/min variable flow source	45 to 87 PSI
Patient connection	Face Mask.	Face Mask.	Tubing with external expiratory valve, manometer and mask
Displays	Manometer (optional)	Manometer (optional)	Manometer
Safety features	Open system and main body design which limits airway pressure rise above 30 cm H <sub>2</sub> O in case of an intentional exhaust port blockage.	Open system design but exhaust port could be un intentionally blocked causing a dangerous rise in patient airway pressure.	Internal high pressure release (at 40 cmH <sub>2</sub> O), anti-suffocation valve on patient valve port
Patient support modes	CPAP	CPAP	CPAP
Peak Flow on Demand (L/min)	Unlimited (open system).	Unlimited (open system).	120
CPAP levels (cmH <sub>2</sub> O)	0 - 20	0-10	0 - 20
Materials in gas pathway	Polycarbonate, PVC and brass	Polycarbonate, PVC	Polycarbonate, PC, Brass, Aluminum & stainless steel
Accessories	N/A	Mask, Manometer and Nebulizer.	Disposable patient circuit with mask, head strap, manometer, oxygen hose

**Differences Between Other Legally Marketed Predicate Devices:**

The proposed device is viewed as substantially equivalent to the predicate devices, K013884 and K093862, in terms of design, materials of composition, indications for use, performance, and function.



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

Mr. Ammar Al-Dojaily  
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CANADA L5S 1C8

DEC 27 2011

Re: K112546  
Trade/Device Name: o\_two CPAP System  
Regulation Number: 21 CFR 868.5965  
Regulation Name: Positive End Expiratory Pressure Breathing Attachment  
Regulatory Class: II  
Product Code: BYE  
Dated: December 21, 2011  
Received: December 21, 2011

Dear Mr. Al-Dojaily:

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.

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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, B.S., M.S., M.B.A.  
Director

Division of Anesthesiology, General Hospital,  
Infection Control and Dental Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

**Indications for Use Statement**

510(k) Number: \_\_\_\_\_ (To be assigned)

Device Name: o\_two CPAP System

**Indications for Use:**

o\_two CPAP System is intended to provide a constant positive airway pressure to spontaneously breathing patients in the hospital environment and emergency medical service applications to treat patients in respiratory distress.

Prescription Use  X   
(21 CFR 801 Subpart C)

AND/OR

Over-The-Counter Use \_\_\_\_\_  
(Part 21 CFR 801 Subpart D)

(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)



(Division Sign-Off)

Division of Anesthesiology, General Hospital  
Infection Control, Dental Devices

510(k) Number:  K112546