

K120518

MAY - 4 2012

**Summary of Safety and Effectiveness**

The Summary of 510(k) safety and effectiveness is in accordance with 21 CFR 807.92.

<b>SUBMITTER INFORMATION</b>	
<b>Name</b>	CareFusion
<b>Address</b>	1500 Waukegan Road MPWM, McGaw Park, IL 60085 USA
<b>Phone number</b>	(847) 473-7208
<b>Fax number</b>	(847) 473-7774
<b>Establishment Registration Number</b>	8030673
<b>Name of contact person</b>	Erika Fernandez
<b>Date prepared</b>	February 20, 2012

<b>NAME OF DEVICE</b>	
<b>Trade or proprietary name</b>	ETCO <sub>2</sub> Nasal Cannula
<b>Common or usual name</b>	Oxygen Delivery, CO <sub>2</sub> Sampling Cannula
<b>Classification name</b>	Carbon Dioxide Gas Analyzer
<b>Classification panel</b>	73 Anesthesiology
<b>Regulation</b>	Class II per 21CFR §868.1400
<b>Product Code(s)</b>	CCK
<b>Legally marketed device(s) to which equivalence is claimed</b>	K863883: Models 4002/4102/4202 Oxy. Delivery/CO <sub>2</sub> Cannula K892406: Modified oxygen delivery/CO <sub>2</sub> Sample Nasal Cannula
<b>Device description</b>	The proposed devices consist of a bifurcated nasal prong with two separate gas conduits. One side of the divided cannula is connected to a gas source for delivering low flow oxygen through flexible tubing to the patient. The other side of the divided cannula directs exhaled gas through flexible tubing to a carbon dioxide monitoring device
<b>Intended use</b>	The ETCO <sub>2</sub> Nasal Cannula is an adjunct to oxygen therapy with its primary function being that of delivering low flow oxygen, up to 4 L/min, to a patient while providing a means to sample expired gas. The target population is adult and pediatric patients.

<b>CATALOG NUMBER /MODEL NUMBERS AND DESCRIPTION</b>	
2802M-10	Pediatric with 7' O <sub>2</sub> tube and 7' CO <sub>2</sub> tube with male luer connector
2802F-10	Pediatric with 7' O <sub>2</sub> tube and 7' CO <sub>2</sub> tube with female luer connector
2811M-10	Adult with 7' O <sub>2</sub> tube and 2" CO <sub>2</sub> tube with male luer connector
2811F-10	Adult with 7' O <sub>2</sub> tube and 2" CO <sub>2</sub> tube with female luer connector
2812M-10	Adult with 7' O <sub>2</sub> and 7' CO <sub>2</sub> tube with male luer connector
2812F-10	Adult with 7' O <sub>2</sub> and 7' CO <sub>2</sub> tube with female luer connector
28M2M	ETCO <sub>2</sub> Sample Line10' Tube, Male/Male Connectors
28M2F	ETCO <sub>2</sub> Sample Line10' Tube, Male/Female Connectors

<b>SUMMARY OF THE TECHNOLOGICAL CHARACTERISTICS OF THE DEVICE COMPARED TO THE PREDICATE DEVICE</b>		
<b>Characteristic</b>	<b>Predicate</b>	<b>New Device</b>
<b>Design</b>	Divided Cannula Salter Eyes® (Side holes) in adult prongs 7' smooth O <sub>2</sub> & 7' smooth CO <sub>2</sub> paired tubing or 7' crush resistant O <sub>2</sub> tube & 2" smooth CO <sub>2</sub> tube Male or female luer connector 10' Sample line with male and female connectors 22mm x 6mm connector Universal O <sub>2</sub> connector	Same No Salter Eyes® (Side holes) in adult prongs Same Same Same Same Same Same
<b>Material</b>		
Cannula; adult & pediatric	Flexible PVC	Same
All Tubing; 7' crush resistant & smooth, 10' & 2" smooth	Flexible PVC	Same
Sliding component (Iariat)	Polyolefin	Similar
Luer Lock Connector, Male	Rigid thermoplastic	Similar
Luer Lock Connector, Female	Rigid thermoplastic	Similar
Tubing Connector (Y)	Flexible PVC	Similar
Universal Connector (Vinyl tip)	Flexible PVC	Similar
22mm x 6mm connector	Polyolefin	Similar
<b>Sterilization</b>	Non sterile, single use	Same
<b>Packaging configuration</b>	Individually packaged in heat-sealed poly bag with product insert that includes the Instructions for Use. 10 units per shipping carton.	Individually packaged in tape-sealed poly bag with product insert that includes the Instructions for Use. 10 units per shipping carton.

**PERFORMANCE DATA**

**SUMMARY OF NON-CLINICAL TESTS CONDUCTED FOR DETERMINATION OF SUBSTANTIAL EQUIVALENCE**

**Performance Test Summary**

<b>Characteristic</b>	<b>Standard/Test/FDA Guidance</b>
Biocompatibility	ISO 10993-1:2009 Biological evaluation of Medical Devices Part 1: Evaluation and Testing
Performance	ISO 594-1 Conical fitting with 6% (Luer) taper for syringes, needles and certain other medical equipment: Part 1- General Requirements
Performance	ISO 594-2 Conical fitting with 6% (Luer) taper for syringes, needles and certain other medical equipment: Part 2- Lock Fittings
Performance	BS EN 13544-2:2002 + A1:2009 Respiratory Therapy Equipment – Part 2: Tubing and Connectors
Performance	ANSI/ISO 5356-1:2004 (MOD) Anesthetic and respiratory equipment - conical connectors – Part 1: Cones and Sockets
Performance	ISO 14971:2009 Medical devices — Application of Risk Management to Medical Devices
Performance	Gas Flow Bench Testing (O <sub>2</sub> Delivery Line) Maximum Flow Resistance: 138 mmH <sub>2</sub> O per foot @ 4 lpm, Pediatric Maximum Flow Resistance: 119 mmH <sub>2</sub> O per foot @ 4 lpm, Adult
Performance	Gas Flow Bench Testing (CO <sub>2</sub> Cannula Sampling Line) Maximum Flow Resistance: 51 mmH <sub>2</sub> O per foot @ 0.5 lpm, Pediatric Maximum Flow Resistance: 65 mmH <sub>2</sub> O per foot @ 0.5 lpm, Adult
Performance	Gas Flow Bench Testing (CO <sub>2</sub> Sampling Line) Maximum Flow Resistance: 64 mmH <sub>2</sub> O per foot @ 0.5 lpm

**SUMMARY OF CLINICAL TESTS CONDUCTED FOR DETERMINATION OF SUBSTANTIAL EQUIVALENCE AND/OR OF CLINICAL INFORMATION**

N/A – No clinical tests were conducted for this submission

**CONCLUSIONS DRAWN FROM NON-CLINICAL AND CLINICAL DATA**

The results of the non-clinical tests show that the ETCO<sub>2</sub> Nasal Cannula meets all performance requirements, and is substantially equivalent to the predicate devices.



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

Ms. Erika Fernandez  
Regulatory Affairs Manager  
CareFusion  
1500 Waukegan Road  
Waukegan, Illinois 60085

MAY - 4 2012

Re: K120518  
Trade/Device Name: End-Tidal CO2 Nasal Cannula  
Regulation Number: 21 CFR 868.1400  
Regulation Name: Carbon Dioxide Das Analyzer  
Regulatory Class: II  
Product Code: CCK  
Dated: April 3, 2012  
Received: April 5, 2012

Dear Ms. Fernandez:

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, 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



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## Indication for Use

510(k) Number (if known): Unknown at this time

Device Name: End-Tidal CO<sub>2</sub> Nasal Cannula

Indications for Use: *The ETCO<sub>2</sub> Nasal Cannula is an adjunct to oxygen therapy with its primary function being that of delivering low flow oxygen, up to 4 L/min, to a patient while providing a means to sample expired gas. The target population is adult and pediatric patients.*

Prescription Use  X  or Over-The Counter Use \_\_\_\_\_

(Per 21 CFR 801 Subpart D)

(Per 21 CFR 870 Subpart C)

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(Division Sign-Off)

Division of Anesthesiology, General Hospital  
Infection Control, Dental Devices

510(k) Number:  K120519