

K132665

**510(K) Summary**

This 510(K) Summary of safety and effectiveness for the Pellevé Non-Ablative Wrinkle Treatment System is submitted in accordance with the requirements of the SMDA 1990 and FDA guidance concerning the organization and content of a 510(K) summary.

Applicant: Ellman International

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400 Karin Lane  
Hicksville, NY 11801

Contact Person: Alison Sathe

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[asathe@ellman.com](mailto:asathe@ellman.com)

Preparation Date: August 21, 2013

Device Trade Name: Pellevé Non-Ablative Wrinkle Treatment System

Common Name: Electrosurgical, cutting & coagulation & accessories

Classification Name: Electrosurgical, cutting & coagulation & accessories  
GEI. 878.4400

Legally Marketed Predicate Device(s): Pellevé Non-Ablative Wrinkle Treatment System

SEP 25 2013

**Device Description:**

The device is a hand-held, non-ablative wrinkle treatment handpiece available with various size electrode end effectors and a detachable cable. The device is activated using a hand or footswitch based on user preference and is used with the Ellman radiofrequency generators labeled for the treatment of wrinkles and rhytides. The radiofrequency generator operates 4 mHz and is used in the CUT or PELLEVE mode for non-ablative wrinkle treatments.

**Intended Use:**

The device has been cleared pursuant to K102698 for the following Indications For Use:  
Non-ablative treatment of mild to moderate facial wrinkles and rhytides for skin phototypes I-IV.

Rationale presented herein is provided to amend the indication for use to:

Non-ablative treatment of mild to moderate facial wrinkles and rhytids

The basis for this rationale is the system utilization of radiofrequency (RF) energy. RF interaction with tissue is based on impedance rather than melanin therefore skin phototype does not affect RF treatments.

**Technological Characteristics:**

The Pellevé Non-Ablative Wrinkle Treatment System has the same technological characteristics as the predicate device.

**Performance Data:**

None submitted

**Substantial Equivalence:**

The Pellevé Non-Ablative Wrinkle Treatment System has the same principles of operation and technological characteristics as the predicate. The modification of the indications for use raises no new issues of safety or effectiveness. Thus, Pellevé Non-Ablative Wrinkle Treatment System is substantially equivalent to the predicate.



Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Center - WO66-G604  
Silver Spring, MD 20993-0002

Ellman International, Incorporated  
Ms. Alison Sathe  
Director of Regulatory and Clinical Affairs  
400 Karin Lane  
Hicksville, New York 11801

September 25, 2013

Re: K132665

Trade/Device Name: Pellevé Non-Ablative Wrinkle Treatment System  
Regulation Number: 21 CFR 878.4400  
Regulation Name: Electrosurgical cutting and coagulation device and accessories  
Regulatory Class: Class II  
Product Code: GEI  
Dated: August 23, 2013  
Received: September 3, 2013

Dear Ms. Sathe:

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 contact 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>. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 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,

Neil R Ogden  
2013.10.16 12:37:17 -04'00'

For Mark N. Melkerson  
Acting Director  
Division of Surgical Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known): K132665

Device Name: Pellevé Non-Ablative Wrinkle Treatment System

Indications for Use:

The Pellevé Non-Ablative Wrinkle Treatment System is indicated for the non-ablative treatment of mild to moderate facial wrinkles and rhytids.

Prescription Use   x    
(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use         
(21 CFR 807 Subpart C)

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

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Concurrence of Center for Devices and Radiological Health (CDRH)

Long H. Chen -A  
Digitally signed by Long H. Chen -A  
DN: cn=US, o=U.S. Government, ou=HHS,  
ou=FDA, ou=People, cn=Long H. Chen -A,  
0.9.2342.19200300.100.1.1=1300369056  
Date: 2013.09.24 15:01:34 -0400

(Division Sign-off) For MXM  
Division of Surgical Devices  
510(k) Number K132665