Traditional 510(k) Submission  MAY 28 2014
LifeBorne Infant Resuscitator – March 18, 2014

510(k) SUMMARY

Submitter Information:
International Biomedical
8206 Cross Park Drive
Austin, TX 78754
U.S.A.

Regulatory Affairs Contact:
Amy Pieper
Director of Regulatory Affairs
(512) 873-0033 - phone
(512) 873-9090 - fax

Date Summary Prepared:
March 18, 2014

Device Identification:
Trade Name: LifeBorne Infant Resuscitator
Common Name: Ventilator, Emergency Gas Powered (Resuscitator)
Regulatory Class: II
Regulation: 868.5925
Product Code: BTL
Panel: Anesthesiology

Predicate Device:
GE – Giraffe and Panda T-Piece Resuscitation System – k070210
Fisher & Paykel – NeoPuff – k892885

Device Description:
The resuscitation system provides the basic equipment required for pulmonary resuscitation of neonatal infants. The LifeBorne Infant Resuscitator is a gas powered emergency resuscitation system. It is intended to be used inside the hospital by trained medical professionals to provide precise FIO2 delivery, manual ventilation, and emergency airway clearance as established by resuscitation guidelines to neonates and infants weighing less than 10 kg (22 lb).

Intended Use:
The LifeBorne Infant Resuscitator is intended to provide the basic equipment required for pulmonary resuscitation of neonatal infants. Pulmonary resuscitation includes practices necessary to establish a clear airway and provide oxygen or air/oxygen mixtures and/or manual ventilation to the neonatal infant.
Traditional 510(k) Submission
LifeBorne Infant Resuscitator – March 18, 2014

Functional Description and Technological Characteristics:
The LifeBorne Infant Resuscitation System incorporates the following components for neonatal resuscitation:

- Venturi vacuum device for suctioning airways (no 510k)
- Vacuum gauge for monitoring suction pressures (no 510k)
- Medical blender to mix air and oxygen to a precise F1O2 (k883038 or k925982)
- Flowmeters for the delivery of oxygen or air/oxygen mixtures (no 510k)
- Peak Inspiratory Pressure (PIP) control to set the maximum pressure delivered during an inspiratory phase of a manual breath (no 510k)
- Peak End Expiratory Pressure (PEEP) control located on a provided T-piece circuit to set the maximum pressure during the expiratory phase of a manual breath (k093913)
- An airway pressure manometer to monitor both PIP and PEEP airway pressure (no 510k)

Substantial Equivalence:
The LifeBorne Infant Resuscitator described in this submission is, in our opinion, substantially equivalent to the predicate device, in regards to intended use and safety and effectiveness. The intended use of the LifeBorne Infant Resuscitator is identical to the intended use of the predicate k070210.

<table>
<thead>
<tr>
<th>Indications for Use</th>
<th>Proposed LifeBorne Infant Resuscitator</th>
<th>Predicate k070210 GE Giraffe and Panda</th>
<th>Predicate k892885 F&amp;P NeoPuff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environment for Use</td>
<td>Hospital, delivery suites, nursery, ICU</td>
<td>Hospital, delivery suites, nursery, ICU</td>
<td>Hospital, delivery suites, nursery, ICU</td>
</tr>
<tr>
<td>Patient Population</td>
<td>Infant &lt; 10 kg</td>
<td>Infant &lt; 10 kg</td>
<td>Infant &lt; 10 kg</td>
</tr>
<tr>
<td>Patient Connection</td>
<td>Face mask; ET tube</td>
<td>Face mask; ET tube</td>
<td>Face mask; ET tube</td>
</tr>
<tr>
<td>Air/Oxygen Mixture</td>
<td>21-100%</td>
<td>21-100%</td>
<td>Not specified</td>
</tr>
<tr>
<td>Gas Flow Source</td>
<td>Wall gas or cylinder</td>
<td>Wall gas or cylinder</td>
<td>Wall gas or cylinder</td>
</tr>
<tr>
<td>Manometer Range</td>
<td>-10 to 80 cm H2O</td>
<td>-10 to 80 cm H2O</td>
<td>-20 to 80 cm H2O</td>
</tr>
</tbody>
</table>
## Traditional 510(k) Submission
### LifeBorne Infant Resuscitator – March 18, 2014

<table>
<thead>
<tr>
<th>Feature</th>
<th>510(k) Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Peak Inspiratory Pressure (PIP)</td>
<td>Max 45 +/- 5 cm H2O</td>
</tr>
<tr>
<td>Positive End Expiratory Pressure (PEEP)</td>
<td>0-6 cm H2O</td>
</tr>
<tr>
<td>Vacuum Pressure Range</td>
<td>0 – 150 mmHg, negative pressure</td>
</tr>
<tr>
<td>Maximum gas flow rate</td>
<td>15 LPM</td>
</tr>
<tr>
<td>Maximum pressure relief</td>
<td>55 cm H2O</td>
</tr>
<tr>
<td>Features: Venturi Vacuum Device</td>
<td>Present, same as predicate</td>
</tr>
<tr>
<td>Features: Vacuum gauge</td>
<td>Present, same as predicate</td>
</tr>
<tr>
<td>Features: Integrated Medical Blender</td>
<td>Present, same as predicate</td>
</tr>
<tr>
<td>Features: Flowmeters for delivery of gas</td>
<td>Present, same as predicate</td>
</tr>
<tr>
<td>Features: PIP control</td>
<td>Present, same as predicate</td>
</tr>
<tr>
<td>Features: PEEP control</td>
<td>Present, same as predicate</td>
</tr>
<tr>
<td>Features: Airway pressure manometer</td>
<td>Present, same as predicate</td>
</tr>
</tbody>
</table>

### Performance Testing:

Pulmonary resuscitation of infants includes well established clinical practices; clinical testing is not necessary to support safety and effectiveness. Conformance of the LifeBorne Infant Resuscitation System to performance specifications has been established through bench testing.

<table>
<thead>
<tr>
<th>TEST</th>
<th>TEST REQUIREMENTS</th>
<th>SUMMARY OF RESULTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Valve Function after Vomitus</td>
<td>The proper function of the circuit shall be verified within 20 seconds of becoming disabled by vomitus. Function is verified by verifying flow valve accuracy.</td>
<td>Passed.</td>
</tr>
<tr>
<td>Inspiratory Resistance</td>
<td>Pressure generated at the patient connection port during expiration should not exceed -5 cmH2O with inspiratory airflow set to 6 L/min.</td>
<td>Passed.</td>
</tr>
<tr>
<td>Expiratory Resistance</td>
<td>Pressure generated at the patient connection port during expiration should not exceed 5 cmH2O with expiratory airflow set to 6 L/min.</td>
<td>Passed.</td>
</tr>
<tr>
<td>Dead Space</td>
<td>The deadspace volume of the T-Piece circuit should be less than 7 mL.</td>
<td>Passed.</td>
</tr>
</tbody>
</table>
Traditional 510(k) Submission
LifeBorne Infant Resuscitator – March 18, 2014

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Requirement</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>FIO2 accuracy</td>
<td>The proper function of the FIO2 adjustment knob shall be verified by comparing the FIO2 setting value with the output oxygen concentration. Values shall be within 5%.</td>
<td>Passed</td>
</tr>
<tr>
<td>Primary and Secondary Flow Valve – Peak Flow</td>
<td>The proper function of the primary and secondary flow valves shall be verified by comparing the flow setting with the actual measured output flow.</td>
<td>Passed</td>
</tr>
<tr>
<td>Airway Manometer Accuracy</td>
<td>The proper function of the airway manometer shall be verified by comparing the pressure readings with the actual measured output pressure.</td>
<td>Passed</td>
</tr>
<tr>
<td>VOC Testing</td>
<td>The device should not add volatile organic compounds (VOCs) to the output gas delivered to the patient.</td>
<td>Passed</td>
</tr>
<tr>
<td>Particulate Analysis</td>
<td>The output of particulate matter sizes 2.5 microns or less are no more than 12 micrograms/cubic meter of air at one atmospheric pressure.</td>
<td>Passed</td>
</tr>
</tbody>
</table>

The LifeBorne Infant Resuscitator met all the performance requirements as outlined above and thus can be found to be substantially equivalent to the predicate devices.

Conclusion:
In regards to intended use and technology the LifeBorne Infant Resuscitator is substantially equivalent to the listed predicates. Any differences between the LifeBorne Infant Resuscitator and the predicates do not raise any new questions of safety and effectiveness.
May 28, 2014

International Biomedical, Ltd.
Amy Pieper
Director of Regulatory Affairs
8206 Cross Park Drive
Austin, TX 78754

Re: K140707
Trade/Device Name: LifeBorne Infant Resuscitator
Regulation Number: 21 CFR 868.5925
Regulation Name: Powered emergency ventilator
Regulatory Class: Class II
Product Code: BTL
Dated: March 18, 2014
Received: March 24, 2014

Dear Ms. Pieper:

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 Industry and Consumer Education 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 Industry and Consumer Education 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,

Erin I. Keith, M.S.
Acting Director
Division of Anesthesiology, General Hospital,
Respiratory, Infection Control and
Dental Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure
Device Name
LifeBorne Infant Resuscitator

Indications for Use
The LifeBorne Infant Resuscitator is intended to provide the basic equipment required for pulmonary resuscitation of neonatal infants. Pulmonary resuscitation includes practices necessary to establish a clear airway and provide oxygen or air/oxygen mixtures and/or manual ventilation to the neonatal infant.

Type of Use (Select one or both, as applicable)
☑ Prescription Use (Part 21 CFR 801 Subpart D)
☐ Over-The-Counter Use (21 CFR 801 Subpart C)

Concurrence of Center for Devices and Radiological Health (CDRH) (Signature)
Anya C. Harry -S
2014.05.23
10:09:29 -04'00'

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