



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
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February 2, 2017

Beijing Sincoheren Science And Technology Development Co.  
% Mike Gu  
Regulatory Affairs Manager  
Guangzhou Osmunda Medical Device Technical Services Co.,ltd.  
8-9th Floor, R&d Building, No.26 Qinglan St, Panyu District  
Guangzhou, 510006 CN

Re: K163123

Trade/Device Name: Q-switched Nd:YAG Laser Therapy Systems  
Regulation Number: 21 CFR 878.4810  
Regulation Name: Laser Surgical Instrument For Use In General And Plastic Surgery And  
In Dermatology  
Regulatory Class: Class II  
Product Code: GEX  
Dated: October 31, 2016  
Received: November 8, 2016

Dear Mike Gu:

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,

**Jennifer R. Stevenson -S**

For Binita S. Ashar, M.D., M.B.A., F.A.C.S.  
Director  
Division of Surgical Devices  
Office of Device Evaluation  
Center for Devices and Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known)  
K163123

Device Name

Q-Switched Nd: YAG Laser Therapy Systems

Indications for Use (Describe)

The Q-Switched Nd: YAG Laser Therapy System (1064nm or 532nm) is indicated for use in tattoo removal, treatment of benign vascular lesions, treatment of benign pigmented lesions, incision, excision, ablation, vaporization of soft tissue for general dermatology as follows:

1064nm:

- Tattoo Removal  
Dark ink: blue and black.
- Treatment of Benign Pigmented Lesions  
Nevus of ota.

532nm:

- Tattoo Removal  
Light ink: red.  
Light ink: sky blue and green.
- Treatment of Benign Vascular Lesions  
Port wine birthmarks; Telangiectasias; Spider angioma; Cherry angioma; Spider nevi.
- Treatment of Benign Pigmented Lesions  
Cafe-au-lait birthmarks; Solar lentiginos; Senile lentiginos; Becker's nevi; Freckles; Nevus spilus.

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)

### CONTINUE ON A SEPARATE PAGE IF NEEDED.

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## 510(k) Summary

In accordance with 21 CFR 807.92 the following summary of information is provided:

### I. SUBMITTER

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Date prepared: Oct 31, 2016

### II. DEVICE

Name of Device: Q-Switched Nd: YAG Laser Therapy Systems

Common/Usual Name: YAG Laser Therapy Systems

Classification Names: Powered Laser Surgical Instrument (21 CFR 878.4810)

Regulation Class: II

Product Code: GEX



III. PREDICATE DEVICE

Nd: YAG Laser System, K133158

This predicate has not been subject to a design-related recall.

No reference devices were used in this submission.

IV. DEVICE DESCRIPTION

The Q-Switched Nd:YAG Laser Systems is based on the Q-Switched Nd: YAG (1064 nm) and frequency doubled KTP Nd: YAG (532nm) Laser Technology. There is one optical cavity containing the Nd: YAG Crystal. It is composed of laser module, articulated arm, laser power supply, cooling system and display and control system.

The Q-Switched Nd: YAG Laser Therapy Systems works based on laser selective photothermy and blasting mechanism of Q-switched laser. Energy form particular wavelength with accurate dose will act on certain targeted color radicals: ink, carbon particles from derma and epidermis, exogenous pigment particles and endogenous melanophore from derma and epidermis. When suddenly being heated, pigment particles immediately blast into smaller pieces, which will be swallowed by macrophage phagocytosis and enters into lymph circulation system and finally be discharged out of body.

The physician is able to select the desired wavelength and the related output energy, spot size and fluency via control panel.

V. INDICATIONS FOR USE

The Q-Switched Nd: YAG Laser Therapy System (1064nm or 532nm) is indicated for use in tattoo removal, treatment of benign vascular lesions, treatment of benign pigmented lesions, incision, excision, ablation, vaporization of soft tissue for general dermatology as follows:

**1064nm:**

-Tattoo Removal

Dark ink: blue and black.

-Treatment of Benign Pigmented Lesions

Nevus of ota.

**532nm:**

-Tattoo Removal

Light ink: red.

Light ink: sky blue and green.

- Treatment of Benign Vascular Lesions

Port wine birthmarks; Telangiectasias; Spider angioma; Cherry angioma; Spider nevi.

-Treatment of Benign Pigmented Lesions

Cafe-au-lait birthmarks; Solar lentiginos; Senile lentiginos; Becker's nevi; Freckles;

Nevus spilus.

VI. TECHNOLOGY

The Q-Switched Nd: YAG Laser Therapy Systems works based on the principles of laser selective photothermy and blasting mechanism of Q-switched laser. Energy from particular wavelength with accurate dose act on certain targeted color radicals: ink, carbon particles from derma and epidermis, exogenous pigment particles and endogenous melanocytes from derma and epidermis. When suddenly being heated, pigment particles immediately blast into smaller pieces, which will be swallowed by macrophage phagocytosis and enter into lymph circulation system and finally be discharged out of the body.

## VII. COMPARISON OF TECHNOLOGICAL CHARACTERISTICS WITH THE PREDICATE DEVICE

| Specification                 | Predicate device   | Proposed device   | Discussion of Differences |
|-------------------------------|--|---|---------------------------|
| <i>K number</i>               | K133158  | --  |                           |
| <i>Product Code</i>           | GEX  |   | Identical                 |
| <i>Manufacturer</i>           | Beijing Toplaser Technology Co., Ltd   | Beijing Sincoheren Science and Technology Development Co., Ltd. |                           |
| <i>Device name</i>            | Nd: YAG Laser System   | Q-Switched Nd: YAG Laser Therapy Systems                        | Similar                   |
| <i>Indications for use</i>    | <p><b>1064nm:</b><br/>           -Tattoo Removal<br/>           ✧ Dark ink: blue and black<br/>           -Treatment of Benign Pigmented Lesions<br/>           ✧ Nevus of ota</p> <p><b>532nm:</b><br/>           -Tattoo Removal<br/>           ✧ Light ink: red<br/>           ✧ Light ink: sky blue and green<br/>           - Treatment of Benign Vascular Lesions<br/>           ✧ Port wine birthmarks; Telangiectasias; Spider angioma; Cherry angioma; Spider nevi<br/>           -Treatment of Benign Pigmented Lesions<br/>           ✧ Cafe-au-lait birthmarks; Solar lentiginos; Senile lentiginos; Becker's nevi; Freckles; Nevus spilus.<br/>           ✧</p> |   | Identical                 |
| <i>Technology</i>             | Q-Switched ND:YAG and KTP Nd: YAG Laser  | Q -Switched ND:YAG and KTP Nd: YAG Laser                        | Identical                 |
| <i>Energy Source</i>          | Xenon Lamp   | Xenon Lamp  | Identical                 |
| <i>Wavelength (nm)</i>        | 1064nm and 532nm   |   | Identical                 |
| <i>Aiming beam wavelength</i> | 635nm  |   | Identical                 |



| Specification                         | Predicate device   | Proposed device   | Discussion of Differences  |
|---------------------------------------|--|---|--|
| <i>Laser output mode</i>              | Q-switched pulse   | Q-switched pulse  | Identical  |
| <i>Aiming laser output power</i>      | <5mw   | 0.1-5mw   | Identical  |
| <i>Maximum Pulse Energy</i>           | @1064nm wavelength: 1--<br>~1000mJ<br>@532nm wavelength:<br>50-300mJ | @1064nm wavelength:<br>500mJ<br>@532nm wavelength:<br>250mJ | Less than Predicate device , more safe                                 |
| <i>Pulse Duration</i>                 | 6~8ns  | 5ns±1ns or 5ns  | Less Pulse Duration, more peak power, more effective                   |
| <i>Repetition Rate</i>                | 1~10Hz   | 1-5Hz   | Less than Predicate device, more safe                                  |
| <i>Nominal ocular hazard distance</i> | NOHD 2.8km   | NOHD 3.3km  | Similar  |
| <i>Spot Size</i>                      | Adjustable Spot Size 3-9 mm(Diameter)                                | Adjustable Spot Size 2-10 mm(Diameter)                      | Wider adjustable range of spot size than predicate device, more useful |
| <i>Material</i>                       | Steel, ABS   | Steel, ABS  | Identical  |
| <i>Beam delivery</i>                  | Articulating Arm Light Guide   | Articulating Arm Light Guide                                | Identical  |
| <i>Cooling</i>                        | Internal distilled water circulating cooling                         | Internal distilled water circulating cooling                | Identical  |
| <i>Anatomical Sites</i>               | Skin and subcutaneous tissue   | Skin and subcutaneous tissue                                | Identical  |

#### VIII. PERFORMANCE DATA

The following performance data were provided in support of the substantial equivalence determination.

##### **Biocompatibility testing**

The biocompatibility evaluation for the Q-Switched Nd: YAG Laser Therapy Systems was conducted in accordance with the guidance "Use of International Standard ISO 10993-1, Biological evaluation of medical devices - Part 1: Evaluation and testing within a risk management process" as recognized by FDA. The biocompatible testing included the following tests:



- Cytotoxicity
- Sensitization
- Irritation

The handpiece is considered skin and subcutaneous tissue contacting for a duration of less than 24 hours.

#### **Electrical safety and electromagnetic compatibility (EMC)**

Electrical safety and EMC testing were conducted on the Q-Switched Nd: YAG Laser Therapy Systems. The device complies with the IEC 60601-1, standard for safety and the IEC 60601-1-2 standard for EMC.

#### **Performance testing**

Performance testing was conducted on the device according to IEC 60825-1.

#### **Software Verification and Validation Testing**

Software verification and validation testing were conducted and documentation was provided as recommended by FDA's Guidance for Industry and FDA Staff, "Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices." The software for this device was considered as a "moderate" level of concern, since a failure or latent flaw could indirectly result in minor injury to the patient or operator through incorrect or delayed information or through the action of a care provider.

#### **Animal Study**

The subject of this premarket submission, Q-Switched Nd: YAG Laser Therapy Systems, does not require animal studies to support substantial equivalence.

#### **Clinical Study**

The subject of this premarket submission, Q-Switched Nd: YAG Laser Therapy Systems, did not require clinical studies to support substantial equivalence.

### **IX. CONCLUSION**

The non-clinical data support the safety of the device and the performance testing report demonstrate that the Q-Switched Nd: YAG Laser Therapy Systems should perform as intended in the specified use conditions. Beijing Sincoheren considers the Q-Switched Nd: YAG Laser Therapy Systems to be substantially equivalent to the predicate device and does not raise any new issues of safety or effectiveness.