



March 5, 2018

Micro-Tech (Nanjing) CO., Ltd.  
Becky Li  
Quality and Regulatory Affairs Director  
NO. 10 Gaoke Third Road  
Nanjing, Jiangsu 210032  
China

Re: K172663  
Trade/Device Name: Cytology Brush  
Regulation Number: 21 CFR§ 876.1500  
Regulation Name: Endoscope and accessories  
Regulatory Class: II  
Product Code: FDX  
Dated: January 31, 2018  
Received: February 2, 2018

Dear Becky Li:

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.

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.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/>) and CDRH Learn (<http://www.fda.gov/Training/CDRHLearn>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<http://www.fda.gov/DICE>) for more information or contact DICE by email ([DICE@fda.hhs.gov](mailto:DICE@fda.hhs.gov)) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

**Charles Viviano -S**

For Benjamin R. Fisher, Ph.D.  
Director  
Division of Reproductive, Gastro-Renal,  
and Urological Devices  
Office of Device Evaluation  
Center for Devices and Radiological Health

Enclosure

**Indications for Use**

510(k) Number (if known)

K172663

Device Name

Cytology Brush

Indications for Use (Describe)

The Cytology Brush is used to collect cells from the bronchi and upper and lower gastrointestinal tracts.

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.**

This section applies only to requirements of the Paperwork Reduction Act of 1995.

**\*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.\***

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

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*"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."*

**Tab 2**

**510K Summary**

This 510(k) Summary of 510(k) safety and effectiveness information is being submitted in accordance with requirements of SMDA 1990 and Title 21, CFR Section 807.92.

The assigned 510(k) Number: **K172663**

**1. Date of Preparation: 2018-01-02**

**2. Sponsor Identification**

**Micro-Tech (Nanjing) Co., Ltd.**

No.10 Gaoke Third Road, Nanjing National Hi-Tech, Industrial Development Zone, Nanjing, Jiangsu Province, PRC

**Establishment Registration Number:** 3004837686

**Contact Person:** Becky Li

**Position:** Quality and Regulatory Affairs Director

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**3. Identification of Proposed Device**

**Trade Name:** Cytology Brush

**Common Name:** Endoscopic Cytology Brush

**Regulatory Information**

Classification Name: Endoscopes and Accessories

Classification: 2

Product Code: FDX

Regulation Number: 876.1500

Review Panel: Gastroenterology/Urology

**Intended Use Statement:**

The Cytology Brush is used to collect cells from the bronchi and upper and lower gastrointestinal tracts.

#### **4. Identification of Predicate Device**

510(k) Number: K896318

Product Name: Wilson-Cook Cytology Brush

Manufacturer: Wilson-Cook Medical, Inc.

#### **5. Indications for Use**

The Cytology Brush is used to collect cells from the bronchi and upper and lower gastrointestinal tracts.

#### **6. Device Description**

The main component of the proposed device is Brush Head, Outer Sheath and Handle. The main operation is move the Finger Ring back and forth to achieve the movement of Brush Head, then the Brush Head can collect cells from the target site.

The proposed device has seven (7) specifications, the main differences of these specifications are Diameter of Brush Head, Diameter of Outer Sheath and Working Length, Color of Finger Ring.

The proposed devices are EO sterilized to achieve the Sterility Assurance Level (SAL) of  $10^{-6}$  and placed in a sterility maintenance package to ensure a shelf life of 2 years.

#### **7. Comparison of Technological Characteristics**

The Cytology Brush of Micro-Tech (Nanjing) CO., Ltd. incorporates substantially equivalent materials, design, configuration, packaging fundamental technology, manufacturing processes, sterilization process and intended use as those featured in the predicate devices (K896318).

## 8. Performance Data

The proposed device **Cytology Brush** meets the requirements of AAMI ANSI ISO 10993-1 :2009/(R)2013 “Biological Evaluation of Medical Devices – Part 1: Evaluation and Testing Within A Risk Management Process”, ISO 11135:2014 “Sterilization of Health Care products - Ethylene Oxide - Requirements for Development, Validation, and Routine Control of Sterilization processes for Medical Devices”, and ISO 10993-7 Second Edition 2008-10-15 “Biological Evaluation Of Medical Devices - Part 7: Ethylene Oxide Sterilization Residuals [Including: Technical Corrigendum 1 (2009)]”.

The device specific guidance document was consulted in preparing this premarket submission, <Guidance for the Content of Premarket Notifications for Biopsy Devices Used in Gastroenterology and Urology>. Performance testing such as Dimension Testing, Tensile Strength Testing and etc, were performed.

The testing performed demonstrated that the proposed device meets the same performance requirements and is Substantially Equivalent (SE) to the currently cleared predicate device (K896318).

## 9. Clinical Test Conclusion

Clinical Test is not applicable for the proposed device. No clinical study is included in this submission.

## 10. Substantially Equivalent (SE) Conclusion

Based on the indications for use, technological characteristics, and safety and performance testing, the **Cytology Brush** has been shown to be appropriate for its intended use and is considered to be substantially equivalent to the currently cleared predicate devices (K896318).