October 23, 2018

BTL Industries, Inc.
David Chmel
VP of Operations
362 Elm Street
Marlborough, MA 01752

Re: K182106
Trade/Device Name: BTL 799-2T
Regulation Number: 21 CFR 890.5850
Regulation Name: Powered Muscle Stimulator
Regulatory Class: Class II
Product Code: NGX
Dated: July 31, 2018
Received: August 3, 2018

Dear David Chmel:

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. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm identifies combination product submissions. 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) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see https://www.fda.gov/CombinationProducts/GuidanceRegulatoryInformation/ucm597488.htm); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; 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 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) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Vivek J. Pinto -S

for Carlos L. Peña, PhD, MS
Director
Division of Neurological
and Physical Medicine Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: 06/30/2020
See PRA Statement below.

510(k) Number *(if known)*
K182106

Device Name
BTL 799-2T

Indications for Use *(Describe)*
BTL 799-2T is indicated to be used for:

• Improvement of abdominal tone, strengthening of the abdominal muscles, development of firmer abdomen.

• Strengthening, Toning and Firming of buttocks and thighs.

• Improvement of muscle tone and firmness, for strengthening muscles in arms.

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.

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BTL Industries

510(k) Summary

General Information

Sponsor:	BTL Industries, Inc. 362 Elm Street Marlborough, MA 01752 Tel: +1-866-285-1656 Fax: +1-888-499-2502
Applicant:	BTL Industries, Inc. 362 Elm Street Marlborough, MA 01752 Tel: +1-866-285-1656 Fax: +1-888-499-2502
Contact Person:	David Chmel BTL Industries, Inc. chmel@btlnet.com
Summary Preparation Date:	October 02, 2018

Device Name

Trade/Proprietary Name:	BTL 799-2T
Primary Classification Name:	Stimulator, Muscle, Powered
Classification Regulation:	21 CFR 890.5850, Class II
Classification Product Code:	NGX

Legally Marketed Predicate Devices

The BTL 799-2T is a state-of-the-art electromagnetic device with accessories, and is substantially equivalent to the current products that are already cleared for distribution in the USA under the following 510(k) Premarket Notification number:

- primary predicate 799-2 (K180813)
- secondary predicate Body Control System “4M” (K092476)

Product Description

The BTL 799-2T is a non-invasive therapeutic device. The device produces electromagnetic field that interacts with the tissues of the human body. The device two outputs enable simultaneous treatment by two applicators.

The BTL 799-2T is equipped with a large color touch screen with wide view angle that significantly facilitates the use of the device. The on-screen information guides the user step-by-step through the entire therapy procedure. The therapeutic parameters are easily set using the touch screen of the device. During the therapy the device keeps information about the applied therapy type, remaining therapy time and main therapy parameters on the screen.

Intended Use

BTL 799-2T is indicated to be used for:

- Improvement of abdominal tone, strengthening of the abdominal muscles, development of firmer abdomen.
- Strengthening, Toning and Firming of buttocks and thighs.
- Improvement of muscle tone and firmness, for strengthening muscles in arms.

Non-clinical Testing

The BTL 799-2T device has been thoroughly evaluated for electrical safety. The device has been found to comply with the following applicable medical device safety standards:

IEC 60601-1	Medical electrical equipment – Part 1: General requirements for basic safety and essential performance
IEC 60601-1-2	Medical electrical equipment – Part 1-2: General requirements for basic safety and essential performance - Collateral standard: Electromagnetic disturbances – Requirements and tests
IEC 60601-1-6	Medical electrical equipment – Part 1-6: General requirements for basic safety and essential performance – Collateral standard: Usability
IEC 60601-2-10	Medical Electrical Equipment – Part 2-10: Particular Requirements for the Basic Safety and Essential Performance of Nerve and Muscle Stimulators

IEC 62366	Medical devices - Application of usability engineering to medical devices
IEC 62304	Medical device software – Software life cycle processes
ISO 14971	Medical devices – Application of risk management to medical devices
ISO 10993-1	Biological evaluation of medical devices – Part 1: Evaluation and testing within a risk management process
ISO 10993-5	Biological evaluation of medical devices – Part 5: Tests for in vitro cytotoxicity
ISO 10993-10	Biological evaluation of medical devices – Part 10: Tests for irritation and skin sensitization

Technological Characteristics

The BTL 799-2T device is technologically identical to the primary predicate device BTL 799-2 (K180813). The BTL 799-2T device and its predicates are comprised of a system console and applicator(s). The system console consists of the electromagnetic field generators, computer, and the touch-screen control panel.

Generated electromagnetic field is intended to interact with the tissues of the human body to achieve muscle stimulation.

The technological similarities and differences between the BTL 799-2T device and the predicate devices are described bellow in the comparison table. The differences do not raise any new types of safety or effectiveness questions.

Comparison with the Predicate Device

510(k) number	**Not Assigned**	**K180813**	**K092476**
Device name	BTL 799-2T	BTL 799-2	Body Control System “4M”
Company name	BTL Industries, Inc.	BTL Industries, Inc.	SPORT-ELEC S.A.
Product Code and Regulation	Physical Medicine 21 CFR 890.5850 NGX – Stimulator, Muscle, Powered, Muscle Conditioning	Physical Medicine 21 CFR 890.5850 NGX – Stimulator, Muscle, Powered, Muscle Conditioning	Physical Medicine 21 CFR 890.5850 NGX – Stimulator, Muscle, Powered, Muscle Conditioning

510(k) number **Device name** **Company name**	**Not Assigned** BTL 799-2T BTL Industries, Inc.	**K180813** BTL 799-2 BTL Industries, Inc.	**K092476** Body Control System "4M" SPORT-ELEC S.A.
Intended Use	BTL 799-2T is indicated to be used for: • Improvement of abdominal tone, strengthening of the abdominal muscles, development of firmer abdomen. • Strengthening, Toning and Firming of buttocks and thighs. • Improvement of muscle tone and firmness, for strengthening muscles in arms.	BTL 799-2 is indicated to be used for: • Improvement of abdominal tone, strengthening of the abdominal muscles, development of firmer abdomen. • Strengthening, Toning and Firming of buttocks and thighs.	Body Control System 4M is indicated for the improvement of muscle tone and firmness, for strengthening muscles in arms, abdomen, thighs and buttocks areas. Contraindicated use on injured or otherwise impaired muscles Not intended for use in any therapy or for the treatment of any medical conditions or diseases
Principle of Action	Initiating action potential of nerves results in muscle contraction	Initiating action potential of nerves results in muscle contraction	Initiating action potential of nerves results in muscle contraction
Clinical Use	Prescription use	Prescription use	Over-the-counter use
Electrical Protection	Class II, BF	Class II, BF	Class II, BF
User Interface	Touch screen	Touch screen	LCD screen
Firmware Controlled	Yes	Yes	Yes
Type of Energy	Magnetic field	Magnetic field	Electrical
Number of outputs	2	2	2
Number of Magnetic Coils in the Applicator	1	1	N/A
Magnetic Field Intensity	299-6 applicator: 0.5–1.8 T	299-6 applicator: 0.5–1.8 T	N/A

510(k) number Device name Company name	Not Assigned BTL 799-2T BTL Industries, Inc.	K180813 BTL 799-2 BTL Industries, Inc.	K092476 Body Control System "4M" SPORT-ELEC S.A.
Pulse Repetition Rate	1 – 150 Hz	1 – 150 Hz	0,25-160 Hz
Pulse Duration	280 ± 20% µs	280 ± 20% µs	70 - 360 µs
Selection of parameters (Intensity, Time)	Yes	Yes	Yes
Therapy Time	Up to 60 min	Up to 60 min	Up to 40 min
Energy Source	100 – 240 V AC, 50–60 Hz	100 – 240 V AC, 50–60 Hz	3.7 V Rechargeable battery pack
System Dimensions (W×H×D)	500×1380×580 mm (20×55×23 in)	500×1380×580 mm (20×55×23 in)	84x126x30xmm (3x5x1 in)
Ambient Temperature	-10°C to +55°C	-10°C to +55°C	0°C to +45°C
Relative Humidity	10% to 85%	10% to 85%	10% to 90%
Environmental Specifications	For indoor use only	For indoor use only	For indoor use only

Substantial Equivalence

The technological characteristics of the BTL 799-2T device are identical to the primary predicate BTL 799-2 and substantially equivalent to the secondary predicate Body Control System "4M".

The BTL 799-2T technology is already cleared. It is using mechanism of neuromuscular stimulation by the current induced in the tissue. The subject device induced current of 28-30 mA is identical to the primary predicate. The already cleared device areas of application are abdomen, buttocks and thighs muscles. The same type of mechanism of action is applied to the same type muscles newly also in area of arms. Since only the application area is being extended, the difference does not rise any new questions of safety and effectiveness.

The main difference between BTL 799-2T and secondary predicate Body Control System "4M" is in the energy type used to stimulate the tissues. The BTL 799-2T device is inducing stimulation current by magnetic field, the Body Control System "4M" is stimulating

neuromuscular tissue via the direct current flow. In both cases there is an induction of electrical stimulus in the neuromuscular tissue which represents identical mechanism of action. Therefore this difference does not rise any new questions of safety and effectiveness.

The differences between the predicate devices and BTL 799-2T device have no significant influence on safety or effectiveness of the BTL 799-2T device. Therefore, the BTL 799-2T device is substantially equivalent to the predicate devices.

Conclusion

Based upon the intended use and known technical information provided in this pre-market notification, the BTL 799-2T device has been shown to be substantially equivalent to currently marketed predicate devices.