July 22, 2019

Taebong Co., Ltd
Joyce Kwun
President
Provision Consulting Group, Inc.
3350 Shelby St., Ste 200
Ontario, CA 91764

Re: K182817
Trade/Device Name: CottonDay Tampon
Regulation Number: 21 CFR 884.5470
Regulation Name: Unscented Menstrual Tampon
Regulatory Class: II
Product Code: HEB
Dated: June 10, 2019
Received: June 12, 2019

Dear Joyce Kwun:

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/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); 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 https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance) and CDRH Learn (https://www.fda.gov/training-and-continuing-education/cdrh-learn). 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 (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Sharon M. Andrews
Assistant Division Director
DHT3B: Division of Reproductive,
Gynecology and Urology Devices
OHT3: Office of Gastrorenal, ObGyn,
General Hospital and Urology Devices
Office of Product Evaluation and Quality
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)*

K182817

Device Name
CottonDay Tampon

Indications for Use (Describe)
The CottonDay Tampon is intended for insertion into the vagina for the absorption of menstrual or other vaginal discharge.

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 – K182817

1. Submitter Information

Applicant:	Taebong Co., Ltd.
Contact:	Ha Neul Jeong
Address:	684-2 Illgok-Dong, Buk-Gu Gwangju Gwangyeogsi, KOREA, REPUBLIC OF 500-866

2. Correspondent Information

Contact:	Joyce Kwun Provision Consulting Group, Inc.
Address:	3350 Shelby St. Ste 200, Ontario, CA 91764
Phone:	+1-909-493-3276 (O) +1-909-680-8562 (M)
Email:	info@provisionfda.com

3. Date Prepared: July 18, 2019

4. Device Information

Device Name:	CottonDay Tampon
Common Name:	Unscented Menstrual Tampon
Regulation Number:	21 CFR 884.5470
Regulation Name:	Tampon, Menstrual, Unscented
Regulatory Class:	Class II
Product Code:	HEB

5. Predicate Device Information

Tosama 100% Organic Cotton Menstrual Tampon (K151170). This predicate device has not been subject to a design-related recall.

6. Device Description

CottonDay Tampon will be offered as a traditional unscented menstrual 100% organic cotton tampon consisting of an absorbent pledget, a withdrawal cord, and an applicator. The pledget is of the traditional cylindrical, bullet-like shape and the applicator has a standard rounded tip to ease insertion. Each tampon is individually wrapped and packaged in multi-unit containers for retail sale. It will be offered in two absorbencies: Regular and Super.

7. Indications for Use

The CottonDay Tampon is intended for insertion into the vagina for the absorption of menstrual or other vaginal discharge.

8. Comparison of Intended Use and Technological Characteristics with the Predicate Device

		Subject Device (K182817)		**Predicate Device (K151170)**	
Product Name		CottonDay Tampon		Tosama 100% Organic Cotton Menstrual Tampon	
Classification Regulation		884.5470		884.5470	
Product Code		HEB		HEB	
Intended Use		The device is intended for insertion into the vagina for the absorption of menstrual or other vaginal discharge.		The device is intended for insertion into the vagina for the absorption of menstrual or other vaginal discharge.	
Sterile?		No		No	
Design		Tampon with cylindrical shape and bullet-like tip. Applicator with smooth, rounded tip.		Tampon with cylindrical shape and bullet-like tip. Applicator with smooth, rounded tip.	
Syngyna Absorbency (gram)		Regular	6.0 - 9.0	Regular	6.0 - 9.0
		Super	9.0 - 12.0	Super	9.0 - 12.0
Pledget Length (mm)		Regular	38	Regular	43.0 - 46.0
		Super	47	Super	48.0 - 51.0
Pledget Diameter (mm)		Regular	12	Regular	11.0 - 12.0
		Super	12	Super	12.0 - 13.0
Applicator Inner Length (mm)		Regular	73 ± 5%	Regular	120 ± 5%
		Super	73 ± 5%	Super	120 ± 5%
Applicator Outer Length (mm)		Regular	76.5 ± 5%	Regular	120 ± 5%
		Super	76.5 ± 5%	Super	120 ± 5%
Applicator Inner Diameter (mm)		Regular	11.8 ± 5%	Regular	13
		Super	11.8 ± 5%	Super	16
Applicator Outer Diameter (mm)		Regular	14.1 ± 5%	Regular	13
		Super	14.1 ± 5%	Super	16
Materials	Pledget	100% Organic Cotton		100% Organic Cotton	
	Applicator	Polyethylene		TPO	

The subject and predicate devices have the same intended use – to absorb menstrual or other discharge in the vagina. They have the same design and comparable dimensions and absorbencies. The differences in technological characteristics do not raise different questions of safety and effectiveness.

9. Summary of Non-Clinical Performance Testing

Performance testing

The following performance characteristics were assessed in accordance with the 2005 FDA guidance document "Menstrual Tampons and Pads: Information for Premarket Notification Submissions (510(k)s) – Guidance for Industry and FDA Staff".

- Dimensions
- Absorbency range
- Chemical residues
- Withdrawal cord strength
- Fiber shedding
- Tampon integrity

Biocompatibility Testing

Biocompatibility studies were performed in accordance with the FDA guidance document "Use of International Standard ISO 10993-1, "Biological Evaluation of Medical Devices – Part 1: Evaluation and testing within a risk management process" issued in 2016 and ISO 10993 standards as follows:

- Cytotoxicity (MEM Elution Test) per ISO 10993-5:2009
- Sensitization (Guinea Pig Maximization Test) per ISO 10993-10:2010
- Irritation (Vaginal Irritation Test) per ISO 10993-10:2010
- Acute Systemic Toxicity per ISO 10993-11:2006

These tests were performed on the subject tampons and applicators, and the results met the requirements of the ISO standards.

Microbiology Testing

Per the 2005 FDA guidance document mentioned above, microbiology testing was conducted to demonstrate that the subject devices do not:

- Enhance the growth of *Staphylococcus aureus*
- Increase the production of Toxic Shock Syndrome Toxin-1 (TSST-1)
- Alter the growth of normal vaginal microflora

10. Conclusions

The subject and predicate devices have the same intended use. Although there are differences in technological characteristics between the subject and predicate devices, these differences do not raise different questions of safety or effectiveness. The performance data demonstrate that the subject devices are substantially equivalent to the predicate devices.