

June 30, 2023

Guangdong Transtek Medical Electronics Co., Ltd. % Kevin Wang Consultant Chonconn Medical Device Consulting Co., Ltd. Room 508, Block C, No. 1029 Nanhai Avenue, Nanshan District Shenzhen, Guangdong 518067 China

Re: K223374

Trade/Device Name: Blood Pressure Monitor Regulation Number: 21 CFR 870.1130 Regulation Name: Noninvasive Blood Pressure Measurement System Regulatory Class: Class II Product Code: DXN Dated: July 7, 2022 Received: November 4, 2022

Dear Kevin Wang:

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) 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 <u>https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems</u>.

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

Sincerely,

Robert T. Kazmierski -S

for

LCDR Stephen Browning Assistant Director Division of Cardiac Electrophysiology, Diagnostics, and Monitoring Devices Office of Cardiovascular 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

510(k) Number (*if known*) K223374

Device Name Blood Pressure Monitor

Indications for Use (Describe)

The device is a digital monitor intended for use in measuring blood pressure and pulse rate. The device is intended to be used in a human adult population with an arm circumference of 9 inches to 17 inches (22 cm to 42 cm). The device is intended for indoor use.

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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Form Approved: OMB No. 0910-0120 Expiration Date: 06/30/2023 See PRA Statement below.

510(K) Summary

Prepared in accordance with the requirements of 21 CFR Part 807.92

Prepared Date: 2021/07/16

1. Submission sponsor

Name: Guangdong Transtek Medical Electronics Co., Ltd. Address: Zone A, No.105, Dongli Road, Torch Development District, Zhongshan, Guangdong, China Contact person: Jerry Fan Title: RA Manager E-mail: jialong.fan@transtekcorp.com

2. Submission correspondent

Name: Chonconn Medical Device Consulting Co., Ltd.

Address: Room 504, Block C, No. 1029 Nanhai Avenue, Nanshan District, Shenzhen, Guangdong, P. R. China 518067

Contact person: Kevin Wang E-mail: kevin@chonconn.com Tel: +86-755 33941160

Trade/Device Name	Blood Pressure Monitor
Model	WPM05 and WPM06
Common Name	Automatic Blood Pressure Monitor
Regulatory Class	Class II
Product Code	DXN
Submission type	Traditional 510(K)

3. Subject Device Information

4. Predicate Device

Manufacturer: Guangdong Transtek Medical Electronics Co., Ltd. Device name: Blood Pressure Monitor, LS-802-GS

510(K) Number: K202891

5. Device Description

The Blood Pressure Monitor is designed to measure the systolic and diastolic blood pressure and pulse rate of an individual by using a non-invasive technique in which an inflatable cuff is wrapped around the upper arm. Our method to define systolic and diastolic pressure is similar to the auscultatory method but uses an electronic pressure sensor rather than a stethoscope and mercury manometer. The sensor converts tiny alterations in cuff pressure to electrical signals, by analyzing those signals to define the systolic and diastolic blood pressure and calculating pulse rate, which is a well-known technique in the market called the "Oscillometric method".

When using the device, users will be able to monitor their blood pressure and their pulse rate. The device will give metrics about heart health:

- Systolic blood pressure
- Diastolic blood pressure
- Pulse rate

The device should be placed on the left upper arm during all the measurement duration. The measurement lasts between 30 seconds and 3 minutes depending on the selected mode by the user. The measurement can be longer if the user selects the triple measurement mode (three blood pressure measurements in a row to give an average).

Users will get an instant feedback after the measurement thanks to a LED matrix located on the tube part of the device.

WPM05 (BPM Connect)

The device synchronizes with Withings application and Withings server via Bluetooth or Wi-Fi connectivity.

WPM06 (BPM Connect Pro)

The device synchronizes with third-party applications by cellular, Wi-Fi or Bluetooth connectivity. On the mobile application, users have access to their historic and more contents around each metrics.

6. Intended use & Indication for use

The device is a digital monitor intended for use in measuring blood pressure and pulse rate. The device is intended to be used in a human adult population with an arm circumference of 9 inches to 17 inches (22 cm to 42 cm). The device is intended for indoor use.

Features	Subject Device	Predicate Device K202891	Remark
	WPM05, WPM06	LS802-GS	
Applicant	Guangdong Transtek Medical	Guangdong Transtek Medical	/
	Electronics Co., Ltd.	Electronics Co., Ltd.	
Classification	21CRF 870.1130	21CRF 870.1130	Same
Regulation			
Classification and	Class II,	Class II,	Same
Code	DXN	DXN	
Common	Automatic Arm Blood Pressure	Automatic Arm Blood Pressure	Same
name	Monitor	Monitor	
Intended use	The device is a digital monitor	The Transtek Blood Pressure	Different ⁽¹⁾
	intended for use in measuring	Monitor is digital monitors	

7. Comparison to the Predicate Device

Features	Subject Device	Predicate Device K202891	Remark
	WPM05, WPM06	LS802-GS	
	blood pressure and pulse rate.	intended for use in measuring	
	The device is intended to be	blood pressure and heartbeat rate	
	used in a human adult	with arm circumference ranging	
	population with an arm	from 22cm to 45cm (about 8 ³ / ₄ "-	
	circumference of 9 inches to 17	17½")	
	inches (22 cm to 42 cm). The	It is intended for adult indoor	
	device is intended for indoor	use only.	
	use.		
Patient	Adults	Adults	Same
Populations			
Principle	Oscillometric method	Oscillometric method	Same
Target population	Adult	Adult	Same
Anatomical sites	Upper Arm	Upper Arm	Same
Where used	Home	Home	Same
(hospital, home,			
ambulance, etc.)			
Energy used and /	5V rechargeable Li-Polymer	4 * 1.5V AA Battery,	Different (2)
or delivered	battery	or by a DC 6V adapter	
Human factors	Blood pressure	Blood pressure	Same
Performance	Measuring systolic and diastolic	Measuring systolic and diastolic	Same
	blood pressure and pulse rate of	blood pressure and pulse rate of	
	adult individual	adult individual, Including	
		irregular pulse rhythm detection	
Biocompatibility	Cuff, according to ISO-10993	Cuff, according to ISO-10993	Same
Compatibility with	Operation Environment:	Operation Environment:	Different
the environment	5° C~ 40° C, up to 90%RH,	5°C~40°C,15%~90%RH,	(3)
and other devices	Atmospheric: 86KPa~106KPa.	Atmospheric: 70KPa~106KPa.	
	Storage Environment:	Storage Environment:	
	-20°C~60°C, up to 95%RH.	-20°C~60°C, ≤93%RH.	
	Atmospheric: 86KPa~106KPa.		
Electrical safety	According to IEC60601-1-2	According to IEC60601-1-2	Same
-	According to IEC60601-1	According to IEC60601-1	
Blood Pressure	0mmHg ~ 285mmHg,	0mmHg ~ 299mmHg,	Different
Measurement	within ± 3 mmHg (0.4kPa) or	within ± 3 mmHg (0.4kPa)	(4)
	2% of reading		
Pulse rate	40-180 beat/minute, $\pm 5\%$ of	40-199 beat/minute, \pm 5% of	Different
measurement	reading	reading	(5)
Cuff Deflation	Automatic deflation	Automatic deflation	Same

Features	Subject Device	Predicate Device K202891	Remark
	WPM05, WPM06	LS802-GS	
Wireless	WPM05: Bluetooth and Wi-Fi	LTE	Different
	WPM06: Bluetooth, Wi-Fi and		(6)
	Cellular		

Justification of difference:

Different (1): The substantial difference of the intended use is the arm circumference ranging. The subject device is within the range of the predicate device. The subject device was validated according to ISO 80601-2-30 and ISO 81060-2. The performance data can demonstrate this difference does not raise different questions of safety and effectiveness.

Different (2): The battery is different. The IEC 60601-1 test report can demonstrate that the subject device can maintain the safety and performance with the battery. Thus, this difference does not raise different questions of safety and effectiveness.

Different (3): Compared with the predicate device, the subject device requires less strict operation and storage environment. The IEC 60601-1-11 test report can demonstrate that the subject device can maintain the safety and performance within the operation and storage environment. Thus, this difference does not raise different questions of safety and effectiveness.

Different (4) (5): The blood pressure measurement range and accuracy are different. The pulse rate measurement range and accuracy are different. The IEC 80601-2-30 can demonstrate that the subject device can maintain the safety and performance within the measurement range. Thus, the difference does not raise different questions of safety and effectiveness.

Different (6): The wireless module is different. However, the wireless function is same. The monitor can transmit the measurement result through wireless and display the measurement on the mobile application. Thus, this difference does not raise different questions of safety and effectiveness.

8. Performance Data

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

Biocompatibility testing

The biocompatibility evaluation for the device was conducted in accordance with the FDA Guidance for Industry and Food and Drug Administration Staff: Use of International Standard ISO 10993-1, "Biological evaluation of medical devices - Part 1: Evaluation and testing within a risk management process". The biocompatibility testing included the following tests:

- Cytotoxicity
- Sensitization
- Irritation

The subject device is considered surface contacting for a duration of exceed 24 hours but not exceed 30 days.

Non-clinical data

The device has been tested according to the following 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 compatibility Requirements and tests
- IEC 80601-2-30: Medical electrical equipment Particular requirements for the basic safety and essential performance of automated non-invasive sphygmomanometers.
- IEC 60601-1-11: Medical electrical equipment -- Part 1-11: General requirements for basic safety and essential performance -- Collateral standard: Requirements for medical electrical equipment and medical electrical systems used in the home healthcare environment
- FDA Guidance for Non-Automated Sphygmomanometer.

Wireless testing:

- ANSI C63.27: 2017: American National Stand for Evaluation of Wireless Coexistence.
- AAMI TIR69: 2017 Risk management of radio-frequency wireless coexistence for medical devices and systems.
- Radio Frequency Wireless Technology in Medical Devices: Guidance for Industry and Food and Drug Administration Staff (August 14, 2013)

Clinical data

The device was tested to ISO 81060-2: 2018 Non-invasive sphygmomanometers - Part 2: Clinical validation of automated measurement type. The study population consisted of 135 qualified healthy adult subjects. All data's mean error and standard deviation of differences for systolic, diastolic pressure is not over the limits of ISO 81060-2: 2018. No adverse effect and/or complication is found in this study.

9. Conclusion

Performance testing and compliance with voluntary standards demonstrate that the proposed subject device is substantially equivalent to the predicate device.