

August 10, 2023

Vyaire Medical, Inc. Megan Walsh Manager, Regulatory Affairs 26125 N. Riverwoods Blvd. Mettawa, Illinois 60045

Re: K231380

Trade/Device Name: AirLife DuoTherm™ Humidification System

Regulation Number: 21 CFR 868.5450

Regulation Name: Respiratory Gas Humidifier

Regulatory Class: Class II Product Code: BTT, BZE Dated: May 12, 2023 Received: May 12, 2023

Dear Megan Walsh:

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 <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> 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 <u>Federal Register</u>.

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

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

Sincerely,

# Ethan L. Nyberg -S

Ethan Nyberg, Ph.D.
Assistant Director
DHT1C: Division of Sleep Disordered
Breathing, Respiratory and
Anesthesia Devices
OHT1: Office of Ophthalmic, Anesthesia,
Respiratory, ENT and Dental 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: 06/30/2023

See PRA Statement below.

510(k) Number (if known)		
K231380		
Device Name		
AirLife DuoTherm <sup>TM</sup> Humidification System		
Indications for Use (Describe)		

The AirLife DuoTherm<sup>TM</sup> Heated Humidifier is intended to add moisture to, and warm, the breathing gases for administration to a patient. Gases available for medical use do not contain sufficient moisture and may damage or irritate the respiratory tract, or desiccate secretions of patients whose supraglottic airways have been bypassed. This product is non-sterile, reusable, and intended to be used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm<sup>TM</sup> Humidification Chamber is intended to hold water required to humidify breathing gases delivered to patients ranging from neonates to adults using a heated humidifier. The product is a single use device, nonsterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm<sup>TM</sup> Neonate Heated-Wire Circuits are intended to deliver and warm breathing gases before they enter the patient's airway. The Neonate Heated-Wire Circuits are used with a pediatric population, specifically the neonate (birth to 28 days) and infant (29 days to 2 years) pediatric subgroups with an ideal body weight of 0.5 to 8kg that requires mechanical ventilation, positive pressure breathing or general medical gases, respectively. The Neonate Heated-Wire Circuits are used for flow rates greater than 1 LPM. The product is single patient use, non-sterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm<sup>TM</sup> Pediatric Heated-Wire Circuits are intended to deliver and warm breathing gases before they enter the patient's airway. The Pediatric Heated-Wire Circuits are used with the pediatric patient population, specifically infant (29 days to 2 years) and children (2 years to 12 years) with an ideal body weight of 6 to 42kg that requires mechanical ventilation, positive pressure breathing or general medical gases, respectively. The Pediatric Heated-Wire Circuits are used for flow rates greater than 2 LPM. The product is single use, non-sterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm<sup>TM</sup> Adult Heated-Wire Circuits are intended to deliver and warm breathing gases before they enter the patient's airway. The Adult Heated-Wire Circuits are used with the adult population and pediatric population, specifically those with an ideal body weight of 30kg or above, that requires mechanical ventilation, positive pressure breathing or general medical gases, respectively. The Adult Heated-Wire Circuits are used for flow rates greater than 3 LPM. The product is single-use, non-sterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm<sup>TM</sup> Adult Heated-Wire NIV Circuit is intended to deliver and warm breathing gases before they enter the patient's airway. The Adult Heated-Wire NIV Circuit is used with the spontaneously breathing adult population (>21 years), specifically those with an ideal body weight of 30kg or above, that benefit from high flow therapy. The Adult Heated-Wire NIV Circuits are used for flow rates greater than 5 LPM. The product is single-use, non-sterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

CONTINUE ON A SEPARATE PAGE IF NEEDED.		
Prescription Use (Part 21 CFR 801 Subpart D)	Over-The-Counter Use (21 CFR 801 Subpart C)	
Type of Use (Select one or both, as applicable)		

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

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# 510(k) Summary AirLife DuoTherm™ Humidification System

Date Prepared: August 8, 2023

Common Name:

This summary of 510(k) information is being submitted in accordance with the requirements of 21 CFR

§807.9	)2.	
ı.	Submitter (21 CFR §807.92(a)(1))	
	Vyaire Medical, Inc.	
	26125 N. Riverwoods Blvd.	
	Mettawa, IL 60045	
	USA	
	Applicant:	Aaron Lynch
	Title:	Aaron Lynch Senior Regulatory Affairs Specialist
	Email:	aaron.lynch@vyaire.com
	Official Correspondent:	Marana Malala
	Title:	Megan Walsh Manager, Regulatory Affairs
	Email:	megan.walsh@vyaire.com
II.	Device Information (21 CFR §807.92(a)(2))	
	Device Name:	ALLIE D. The same that a state of the same
	Proprietary Name:	AirLife DuoTherm™ Humidification System AirLife DuoTherm™
	Device Classification:	Class II
	Primary Product Code:	
	Regulation:	BTT
	Regulation Name:	21 CFR §868.5450 Respiratory gas humidifier
	Review Panel:	73 – Anesthesiology
	Common Name:	Humidifier
	Secondary Product Code:	BZE

**Heated Breathing Circuits** 



#### III. Primary Predicate Device and Reference Device Information (21 CFR §807.92(a)(3))

Primary Predicate Device				
Device Name	510(k) Number	<b>Decision Date</b>		
MR850 Respiratory Humidifier, Model MR850JHU	K033710	April 13, 2004		
Reference De	vices			
Device Name	510(k) Number	<b>Decision Date</b>		
MODELS MR700/MR720/MR730 DUAL SERVO	K913368	January 13, 1992		
RESP HUMID ACC				
AirLife™ Autofill Humidification Chamber	K160764	August 25, 2016		
AirLife™ Adult Heated Wire Circuit	K153234	July 7, 2016		
AirLife™ Adult Heated Wire BiPAP/NIV Circuit	K170378	September 14, 2017		
AirLife™ Infant Heated Wire Circuit	K151303	January 21, 2016		

#### IV. Device Description (21 CFR §807.92(a)(4))

The AirLife DuoTherm™ Humidification System is used to deliver heated, humidified breathing gases to a patient's airway when he/she is mechanically ventilated, receiving continuous non-invasive (NIV) positive airway pressure or high-flow oxygen therapy. The system is intended for use in a standard hospital or professional health care environment.

The AirLife DuoTherm™ Humidification System consists of:

- A **heated humidifier**, which includes reusable temperature probes, heated wire adapters, and a power cord,
- A humidification chamber, and
- **Heated wire circuits**, which include neonate, pediatric, and adult single and dual limb circuits, as well as an adult heated wire NIV circuit.

#### V. Intended Use (21 CFR §807.92(a)(5))

The AirLife DuoTherm™ Humidification System is intended to add moisture and warmth to breathing gases administered to patients that require assistance breathing or mucosal humidification. Gases that are available for medical use do not contain sufficient moisture and may damage or irritate the respiratory tract.

#### Indications for Use:

The AirLife DuoTherm™ Heated Humidifier is intended to add moisture to, and to warm, the breathing gases for administration to a patient. Gases available for medical use do not contain sufficient moisture and may damage or irritate the respiratory tract, or desiccate secretions of



patients whose supraglottic airways have been bypassed. This product is non-sterile, reusable, and intended to be used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm™ Humidification Chamber is intended to hold water required to humidify breathing gases delivered to patients ranging from neonates to adults using a heated humidifier. The product is a single-use device, non-sterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm™ Neonate Heated-Wire Circuits are intended to deliver and warm breathing gases before they enter the patient's airway. The Neonate Heated-Wire Circuits are used with a pediatric population, specifically the neonate (birth to 28 days) and infant (29 days to 2 years) pediatric subgroups with an ideal body weight of 0.5 to 8kg that requires mechanical ventilation, positive pressure breathing or general medical gases, respectively. The Neonate Heated-Wire Circuits are used for flow rates greater than 1 LPM. The product is single patient use, non-sterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm™ Pediatric Heated-Wire Circuits are intended to deliver and warm breathing gases before they enter the patient's airway. The Pediatric Heated-Wire Circuits are used with the pediatric patient population, specifically infant (29 days to 2 years) and children (2 years to 12 years) with an ideal body weight of 6 to 42kg that requires mechanical ventilation, positive pressure breathing or general medical gases, respectively. The Pediatric Heated-Wire Circuits are used for flow rates greater than 2 LPM. The product is single-use, non-sterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm™ Adult Heated-Wire Circuits are intended to deliver and warm breathing gases before they enter the patient's airway. The Adult Heated-Wire Circuits are used with the adult population and pediatric population, specifically those with an ideal body weight of 30kg or above, that requires mechanical ventilation, positive pressure breathing or general medical gases, respectively. The Adult Heated-Wire Circuits are used for flow rates greater than 3 LPM. The product is single-use, non-sterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

The AirLife DuoTherm™ Adult Heated-Wire NIV Circuit is intended to deliver and warm breathing gases before they enter the patient's airway. The Adult Heated-Wire NIV Circuit is used with the spontaneously breathing adult population (>21 years), specifically those with an ideal body weight of 30kg or above, that benefit from high flow therapy. The Adult Heated-Wire NIV Circuits are used for flow rates greater than 5 LPM. The product is single-use, non-sterile, and used in professional healthcare environments under the supervision of a licensed healthcare practitioner.

#### VI. Summary of Substantial Equivalence (21 CFR §807.92(a)(6))



See below for a device comparison table for the AirLife DuoTherm™ Humidification System, which compares the system (subject device) to its primary predicate device (MR850 Heated Humidifier, K033710) and reference device (MR730 Heated Humidifier, K913368) with respect to intended use, technological characteristics, and principles of operation, providing more detailed information regarding the basis for the determination of substantial equivalence.

#### <u>Device Comparison Table – AirLife DuoTherm™ Humidification System</u>

	Subject Device	<b>Primary Predicate</b>	Reference Device	Comparison
	AirLife	Device	MR730 Heated	
	DuoTherm™	MR850 Heated	Humidifier	
	Humidification	Humidifier		
	System		Manufacturer:	
		Manufacturer:	Fisher & Paykel	
	Manufacturer:	Fisher & Paykel	Electronics, Ltd.	
	Vyaire Medical,	Healthcare, Ltd.	(K913368)	
	Inc.	(K033710)		
	AirLife D	uoTherm™ Humidifica	ation System	
Intended Use	The AirLife	The MR850	Not published on	The subject device
	DuoTherm™	humidifier is	the FDA website	is similar to the
	Humidification	intended to add		primary predicate
	System is intended	moisture to, and		device cleared
	to add moisture	to warm, the		under K033710.
	and warmth to	breathing gases		Both are intended
	breathing gases	for administration		to add moisture
	administered to	to a patient. Gases		and warmth to
	patients that	available for		breathing gases
	require assistance	medical use do not		administered to
	breathing or	contain sufficient		patients.
	mucosal	moisture and may		
	humidification.	damage or irritate		Verbiage
	Gases that are	the respiratory		differences
	available for	tract, or desiccate		between the
	medical use do not	secretions of		intended use of
	contain sufficient	patients whose		the subject device
	moisture and may	supraglottic		and the primary
	damage or irritate	airways have been		predicate device
	the respiratory	bypassed.		are only cosmetic
	tract.			in nature.
				These differences
				have no impact to



				K231380
	Subject Device	Primary Predicate	Reference Device	<u>Comparison</u>
	AirLife	<u>Device</u>	MR730 Heated	
	DuoTherm™	MR850 Heated	Humidifier	
	Humidification	Humidifier		
	System		Manufacturer:	
		Manufacturer:	Fisher & Paykel	
	Manufacturer:	Fisher & Paykel	Electronics, Ltd.	
	Vyaire Medical,	Healthcare, Ltd.	(K913368)	
	Inc.	(K033710)		
	AirLife D	uoTherm™ Humidific	ation System	
				safety and
				effectiveness.
Principle of	The AirLife	Heat is used to	Not available	The subject device
Operation	DuoTherm™	provide		is similar to the
	Heated Humidifier	evaporated water		primary predicate
	heats and	content to dry		device cleared
	humidifies	breathing gases.		under K033710.
	respiratory gases	Heated or		Both heat and
	that are delivered	unheated		humidify
	to patients via	breathing tubes		respiratory gases
	mechanical	can be used to		that are delivered
	ventilation, the	deliver the		to patients.
	trachea with	humidified gas to		
	assisted, positive	the patient.		Verbiage
	air pressure, or a	Heated breathing		differences
	nose and/or face	tubes increase		between principle
	mask.	operating		of operation of the
	mask.	efficiency and		subject device and
	The AirLife	reduce excessive		the primary
	DuoTherm™	water and heat		predicate device
	Humidification	loss.		-
	Chamber fits to	1055.		are only cosmetic
		The chamber		in nature.
	the heated humidifier and	The chamber		Those differences
		slides onto the		These differences
	holds the water	heater plate and		have no impact to
	required to	contains the water		safety and
	humidify the	supply for adding		effectiveness.
	breathing gases	humidity to		
	that are delivered	breathing gases.		
	to patients.			
		Resistance wires		
	Resistance wires	within the tubing		
	within the tubing	generate heat to		
	generate heat to	maintain		



			_	K231380
	Subject Device	Primary Predicate	Reference Device	Comparison
	AirLife	<u>Device</u>	MR730 Heated	
	DuoTherm™	MR850 Heated	Humidifier	
	Humidification	Humidifier		
	System		Manufacturer:	
		Manufacturer:	Fisher & Paykel	
	Manufacturer:	Fisher & Paykel	Electronics, Ltd.	
	Vyaire Medical,	Healthcare, Ltd.	(K913368)	
	Inc.	(K033710)		
	AirLife D	uoTherm™ Humidific	ation System	
	maintain	temperature and		
	temperature and	humidity.		
	humidity.	,		
Patient	IDENTICAL TO	Neonates to	Not available	The subject device
Population	K033710	Adults		is identical to the
	1.000720	7.10.0.100		primary predicate
				device cleared
				under K033710.
Use	Hospital, subacute	Hospital intensive	Hospital use by	The subject device
Environment	care facilities and	care units by	trained personnel	is similar to the
Liiviioiiiieiit	intra-hospital	trained personnel	trained personner	primary predicate
	transfer by trained	trained personner		device and
	-			reference device
	personnel			
				cleared under
				K033710 and
				K913368,
				respectively. All
				are intended to be
				used in a
				professional
				healthcare facility.
				Verbiage
				differences in use
				environment
				between the
				subject device and
				the primary
				predicate and
				reference devices
				have no impact to
				safety and
				effectiveness.
		1		Circuiveriess.



	Subject Device	Primary Predicate	Reference Device	Comparison
	AirLife	Device	MR730 Heated	
	DuoTherm™	MR850 Heated	Humidifier	
	Humidification	Humidifier	Translation	
	System	Translation	Manufacturer:	
	System	Manufacturer:	Fisher & Paykel	
	Manufacturer:	Fisher & Paykel	Electronics, Ltd.	
	Vyaire Medical,	Healthcare, Ltd.	(K913368)	
	Inc.	(K033710)		
	AirLife DuoTherm™ Humidification System			
System	IDENTICAL to	Heated humidifier	Heated humidifier	The subject device
Components	K033710 &	(electrical	(electrical	is identical to the
(Comparison	K913368	adapters and	adapters and	primary predicate
on Subsequent		temperature/flow	temperature/flow	device and the
Pages)		probes),	probes),	reference device
		humidification	humidification	cleared under
		chamber, and	chamber, and	K033710 and
		breathing circuits	breathing circuits	K913368,
		(multiple	(multiple	respectively.
		configurations)	configurations)	

# VII. Performance Testing (21 CFR §807.92(b)(1))

The subject device was designed and tested in accordance with the consensus standards listed below:

# • Non-clinical Performance Testing

Standard	Description
ISO 80601-2-74:2017	Medical electrical equipment – Part 2-74: Particular requirements for basic
	safety and essential performance of respiratory humidifying equipment
IEC 60601-1:2012	Medical electrical equipment – Part 1: General requirements for basic
	safety and essential performance
IEC 60601-1-2:2014	Medical electrical equipment – Part 1-2: General requirements for basic
	safety and essential performance – Collateral standard: Electromagnetic
	disturbances – Requirements and tests
IEC TR 60601-4-2	Medical electrical equipment – Part 4-2: Guidance and interpretation –
	Electromagnetic immunity: Performance of medical electrical equipment
	and medical electrical systems
IEC 60601-1-6:2013-10	Medical electrical equipment – Part 1-6: General requirements for basic
	safety and essential performance – Collateral standard: Usability
IEC 60601-1-8:2012	Medical electrical equipment – Part 1-8: General requirements for basic
	safety and essential performance – Collateral standard: General



	requirements, tests and guidance for alarm systems in medical electrical equipment and medical electrical systems
IEC 62366-1:2015	Medical devices – Part 1: Application of usability engineering to medical devices
IEC 62304:2015	Medical device software – Software life cycle processes
ISO 5356-1:2015	Anaesthetic and respiratory equipment – Conical connectors – Part 1: Cones and sockets
ISO 5367:2014	Anaesthetic and respiratory equipment – Breathing sets and connectors

# Biocompatibility

Standard	Description
ISO 18562-1:2017	Biocompatibility evaluation of breathing gas pathways in healthcare
	applications – Part 1: Evaluation and testing within a risk management
	process
ISO 18562-2:2017	Biocompatibility evaluation of breathing gas pathways in healthcare
	applications – Part 2: Tests for emissions of particulate matter
ISO 18562-3:2017	Biocompatibility evaluation of breathing gas pathways in healthcare
	applications – Part 3: Tests for emissions of volatile organic compounds
ISO 18562-4:2017	Biocompatibility evaluation of breathing gas pathways in healthcare
	applications – Part 4: Tests for leachables in condensate
ISO 10993-1:2018	Biological evaluation of medical devices – Part 1: Evaluation and testing
	within a risk management process
ISO 10993-3:2014	Biological evaluation of medical devices – Part 3: Tests for genotoxicity,
	carcinogenicity and reproductive toxicity
ISO 10993-5:2009	Biological evaluation of medical devices – Part 5: Tests for in vitro
	cytotoxicity
ISO 10993-10:2021	Biological evaluation of medical devices – Part 10: Tests for skin
	sensitization
ISO 10993-11:2017	Biological evaluation of medical devices – Part 11: Tests for systemic
	toxicity
ISO 10993-12:2021	Biological evaluation of medical devices – Part 12: Sample preparation and
	reference materials
ISO 10993-17:2002	Biological evaluation of medical devices – Part 17: Establishment of
	allowable limits for leachable substances
ISO 10993-17:2022	Biological evaluation of medical devices – Part 17: Establishment of
(draft)	allowable limits for leachable substances (draft)
ISO 10993-18:2020	Biological evaluation of medical devices – Part 18: Chemical
	characterization of medical device materials within a risk management
	process
ISO 10993-23:2021	Biological evaluation of medical devices – Part 23: Tests for irritation



ISO 21726:2019	Biological evaluation of medical devices – Application of the threshold of
	toxicological concern (TTC) for assessing biocompatibility of medical device
	constituents

• Clinical Performance Data (21 CFR §807.92(b)(2)): There was no clinical testing required to support the AirLife DuoTherm™ Humidification System, as the intended use and indications for use are equivalent to the primary predicate and reference devices. These types of devices, including the primary predicate device, have been on the market with a proven safety and efficacy record for the use of the device. The non-clinical testing detailed in this submission supports the substantial equivalence of the AirLife DuoTherm™ Humidification System, and its safety and effectiveness.

#### VIII. Substantial Equivalence Conclusion (21 CFR §807.92(b)(2))

The AirLife DuoTherm™ Humidification System is substantially equivalent in intended use and fundamental scientific technology to the following legally marketed device in commercial distribution: MR850 Heated Humidifier (K033710). The AirLife DuoTherm™ Humidification System met all specified criteria and did not raise new safety and/or effectiveness questions. The substantial equivalence of the subject device is based on similar indications for use, fundamental technology, including design, and operational principles. Based on the similarities to the primary predicate device, reference devices, and performance data, the AirLife DuoTherm™ Humidification System is substantially equivalent to its primary predicate device (K033710) and reference devices.