



July 3, 2024

Asclepion Laser Technologies GmbH
Tom Gruender
RA Manager
Bruesseler Strasse 10
Jena, 07745
Germany

Re: K241600

Trade/Device Name: Dermablate
Regulation Number: 21 CFR 878.4810
Regulation Name: Laser Surgical Instrument For Use In General And Plastic Surgery And In
Dermatology
Regulatory Class: Class II
Product Code: GEX
Dated: April 23, 2024
Received: June 4, 2024

Dear Tom Gruender:

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 (the 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 available 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.

Additional information about changes that may require a new premarket notification are provided in the FDA guidance documents entitled "Deciding When to Submit a 510(k) for a Change to an Existing Device" (<https://www.fda.gov/media/99812/download>) and "Deciding When to Submit a 510(k) for a Software Change to an Existing Device" (<https://www.fda.gov/media/99785/download>).

Your device is also subject to, among other requirements, the Quality System (QS) regulation (21 CFR Part 820), which includes, but is not limited to, 21 CFR 820.30, Design controls; 21 CFR 820.90, Nonconforming product; and 21 CFR 820.100, Corrective and preventive action. Please note that regardless of whether a change requires premarket review, the QS regulation requires device manufacturers to review and approve changes to device design and production (21 CFR 820.30 and 21 CFR 820.70) and document changes and approvals in the device master record (21 CFR 820.181).

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 Part 803) for devices or postmarketing safety reporting (21 CFR Part 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 Part 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR Parts 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 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,

TANISHA
L. HITHE -S

Digitally signed by
TANISHA L. HITHE -
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Date: 2024.07.03
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Tanisha Hithe
Assistant Director
DHT4A: Division of General Surgery Devices
OHT4: Office of Surgical & Infection Control Devices,
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)

K241600

Device Name

Dermablate

Indications for Use (Describe)

Dermablate System with its accessories is indicated for coagulation, vaporization, ablation, or cutting of soft tissue (skin) in Dermatology, Plastic Surgery, Oral Surgery, ENT, Gynecology, General Surgery, Podiatry, and Ophthalmology (skin around the eyes).

Dermablate System, when used with its micro beam handpieces, is intended for use in Dermatological procedures and Skin resurfacing procedures.

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 K241600

Applicant / Manufacturer Name and Address:	Asclepion Laser Technologies GmbH Bruesseler Strasse 10, 07745 Jena - Germany
510(k) Contact Person:	Mr. Tom Gruender Regulatory Affairs Manager Tel.: 0049 3641 7700 201 E-Mail: tom.gruender@asclepion.com
Date Prepared:	July 2, 2024
Trade Name:	Dermablate
Classification:	Class II
Classification Name:	Laser surgical instrument for use in general and plastic surgery and in dermatology.
Regulation Number:	21 CFR 878.4810
Product Code:	GEX
Main Predicate Device	MCL 31 Dermablate (K210634), Asclepion Laser Technologies GmbH
Reference Device	Erise (K202258), El.En SpA

Description of the device:

Dermablate is a pulsed Er:YAG laser emitting a wavelength of 2940 nm. The system comprises a main console unit, detachable handpieces, and a footswitch. The device can be operated with micro beam and non-micro beam handpieces. The system incorporates a suction unit for the safe removal of laser plume. The laser is fired with a foot-operated switch (footswitch).

Description of the modifications:

The laser is a modification to previously cleared MCL 31 Dermablate due the following main technical modifications:

- Increase of max pulse energy to 3J.
- Adding of a microbeam handpiece named "DeepSpot".

Hardware and software changes were implemented to accommodate the changes mentioned above.

The modified device has the same intended use of the unmodified device. Moreover, the intended use of the modified device, as described in its labeling, has not changed as a result of the modifications.

Based on the nature of the changes implemented, the device underwent and successfully passed performance testing and software verifications and validation according to the relevant standards.

Intended Use:

Dermablate with its accessories is indicated for coagulation, vaporization, ablation, or cutting of soft tissue (skin) in Dermatology, Plastic Surgery, Oral Surgery, ENT, Gynecology, General Surgery, Podiatry, and Ophthalmology (skin around the eyes).

Dermablate, when used with its micro beam handpieces, is intended for use in Dermatological procedures and Skin resurfacing procedures.

Technological Characteristics Comparison

	Main Predicate Device	Reference Predicate Device	Subject device
	MCL 31 Dermablate	Erise	Dermablate
510k number	K210634	K202258	-
Device Type	Er:YAG	Er:YAG	Er:YAG
Wavelength	2940 nm	2940 nm	2940 nm
Energy, max	2.5 J	3J	3 J
Fluence, max.	Up to 250 J/cm ² (non microbeam mode) Up to 150 J/cm ² (microbeam mode with stacking pulses)	Up to 95 J/cm ² (non microbeam mode) Up to 121 J/cm ² (microbeam mode with stacking pulses)	Up to 250 J/cm ² (non microbeam mode) Up to 150 J/cm ² (microbeam mode with stacking pulses)
Pulse Duration	0.1 to 1ms	0.3 to 1.5ms	0.1 to 1ms
Repetition rate, max	20 Hz	6Hz	20 Hz
Treatment area / Spot size	VarioTEAM Handpieces: from 1 to 12 mm MicroSpot Handpiece: 350 µm to 600 µm spot MY JULIET Handpiece: 425 µm & 600 µm spot	2/4/9mm 300-600 µm microdot diameter	VarioSpot Handpieces: from 1 to 12 mm MicroSpot Handpiece: 350 µm to 600 µm spot DeepSpot Handpiece: 325 µm to 400 µm spot MY JULIET Handpiece: 425 µm & 600 µm spot

Non clinical Performance Data:

The following performance data were applied in support of the substantial equivalence determination:

- IEC 60601-1-6:2010/AMD1:2013: Medical electrical equipment – Part 1: General requirements for safety and essential performance

- IEC 60601-1-2:2015: Medical electrical equipment – Part 1-2: General requirements for safety and essential performance – Collateral standard: Electromagnetic compatibility – Requirements and tests
- IEC 62304: Medical Device Software – Software life cycle processes
- IEC 62366-1:2015: Medical devices – Application of usability engineering to medical devices
- IEC 60601-2-22:2019: Medical electrical equipment – Part 2: Particular requirements for the safety of diagnostic and therapeutic laser equipment
- IEC 60825-1:2014: Safety of laser products - Part 1: Equipment classification, and requirement
- ISO 14971: Medical devices – Application of risk management to medical devices
- Software verification and validation testing were conducted and documentation was provided as recommended by FDA’s Guidance for Industry and FDA Staff, “Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices”.
- EN/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
- ISO 10993-23: Biological evaluation of medical devices - Part 23 Tests for irritation

Dermablate passed all the required testing and is in compliance with all applicable sections of the abovementioned performance standards.

Biocompatibility:

The biocompatibility of Dermablate handpieces is established based on the predicate devices.

Comparison with predicate device:

The subject and predicate devices have the same intended use and the same fundamental scientific technology. Any minor difference does not raise concern about safety and effectiveness.

Conclusions

The differences in the indications for use and technological characteristics between the subject and predicate device do not raise new types of questions regarding safety and effectiveness, and the subject device is as safe, as effective, and performs as well as the legally marketed predicate devices.