



August 2, 2024

Beijing Mega Beauty Technology Co.,Ltd.  
% Ray Wang  
General Manager  
Beijing Believe-Med Technology Service Co., Ltd.  
Rm.912, Building #15, XiYueHui, No.5, YiHe North Rd.,  
FangShan District  
Beijing, 102401  
China

Re: K241642

Trade/Device Name: Diode Laser Hair Removal System (MBT-Diode Laser)  
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: June 6, 2024  
Received: June 7, 2024

Dear Ray 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 (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](mailto: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 -S  
Date: 2024.08.02  
15:37:09 -04'00'

Tanisha Hithe  
Assistant Director  
DHT4A: Division of General Surgery Devices  
OHT4: Office of Surgical and  
Infection Control Devices  
Office of Product Evaluation and Quality  
Center for Devices and Radiological Health

Enclosure

## Indications for Use

Submission Number (if known)

K241642

Device Name

Diode Laser Hair Removal System (MBT-Diode Laser)

Indications for Use (Describe)

The Diode Laser Hair Removal System (Model: MBT-Diode Laser) is intended for hair removal, permanent hair reduction on all skin types (Fitzpatrick skin type I-VI), including tanned skin. Permanent hair reduction is defined as the long-term, stable reduction in the number of hairs regrowing when measured at 6, 9, and 12 months after the completion of a treatment regime.

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.

**\*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.\***

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## 510(k) Summary    K241642

This 510(k) Summary of 510(k) safety and effectiveness information is being submitted in accordance with requirements of SMDA 1990 and Title 21, CFR Section 807.92.

The assigned 510(k) Number: \_\_\_\_\_

1.    Date of Preparation:2024/06/06
2.    Sponsor Identification

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3.    Designated Submission Correspondent

Mr. Ray Wang

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4. Identification of Proposed Device

Trade Name: Diode Laser Hair Removal System  
Common Name: Powered Laser Surgical Instrument  
Model(s): MBT-Diode Laser

Regulatory Information:

Classification Name: Powered Laser Surgical Instrument  
Classification: II;  
Product Code: GEX;  
Regulation Number: 21 CFR 878.4810;  
Review Panel: General & Plastic Surgery;

5. Identification of Predicate Device(s)

Predicate Device

510(k) Number: K211335  
Product Name: Diode Laser Machine  
Manufacturer: Zhengzhou Bestview St Co., Ltd.

Reference Device

510(k) Number: K200525  
Product Name: Medical Diode Laser Hair Removal System  
Manufacturer: Weifang Mingliang Electronics CO., LTD.

6. Device Description:

Diode Laser Hair Removal System (Model: MBT-Diode Laser) is a surgical device, which is intended for hair removal, permanent hair reduction on all skin types (Fitzpatrick skin type I-VI). The Dermatological Diode Laser Systems utilize a semiconductor diode with invisible infrared radiation as a laser source to emit 808nm wavelength laser which is absorbed by melanin. The laser power is delivered to the treatment area via laser handle. The emission laser is activated by foot-switch or handle button.

The Diode Laser Hair Removal System consists of the following major components

- a. The main console unit that incorporates the main CPU board, power supply modules, laser power supply, laser device, cooling system and switching module
- b. Handpiece
- c. Footswitch

7. Indication For Use Statement:

The Diode Laser Hair Removal System (Model: MBT-Diode Laser) is intended for hair removal, permanent hair reduction on all skin types (Fitzpatrick skin type I-VI), including tanned skin. Permanent hair reduction is defined as the long-term, stable reduction in the number of hairs regrowing when measured at 6, 9, and 12 months after the completion of a treatment regime.

## 8. Substantially Equivalent (SE) Comparison

Table 7-1 General Comparison

| Item                      | Proposed Device                                                                                                                                                                                                                                                                                                                                            | Predicate Device<br>K211335                                                                                                                                                                                                                                                                                                                                 | Reference Device<br>K200525                                                                                                                                                                                                                                                                                               | Remark |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Device Name               | Diode Laser Hair Removal System                                                                                                                                                                                                                                                                                                                            | Diode Laser Machine                                                                                                                                                                                                                                                                                                                                         | Diode Laser Machine                                                                                                                                                                                                                                                                                                       | /      |
| Classification Regulation | 21 CFR 878.4810                                                                                                                                                                                                                                                                                                                                            | 21 CFR 878.4810                                                                                                                                                                                                                                                                                                                                             | 21 CFR 878.4810                                                                                                                                                                                                                                                                                                           | SAME   |
| Classification Panel      | General & Plastic Surgery                                                                                                                                                                                                                                                                                                                                  | General & Plastic Surgery                                                                                                                                                                                                                                                                                                                                   | General & Plastic Surgery                                                                                                                                                                                                                                                                                                 | SAME   |
| Class                     | II                                                                                                                                                                                                                                                                                                                                                         | II                                                                                                                                                                                                                                                                                                                                                          | II                                                                                                                                                                                                                                                                                                                        | SAME   |
| Product Code              | GEX                                                                                                                                                                                                                                                                                                                                                        | GEX                                                                                                                                                                                                                                                                                                                                                         | GEX                                                                                                                                                                                                                                                                                                                       | SAME   |
| Indication for use        | The Diode Laser Hair Removal System is intended for hair removal, permanent hair reduction on all skin types (Fitzpatrick skin type I-VI), including tanned skin. Permanent hair reduction is defined as the long-term, stable reduction in the number of hairs regrowing when measured at 6, 9, and 12 months after the completion of a treatment regime. | The Diode Laser Machine Model:BM-100 is intended for hair removal, permanent hair reduction on all skin types (Fitzpatrick skin type I-VI), including tanned skin. Permanent hair reduction is defined as the long-term, stable reduction in the number of hairs regrowing when measured at 6, 9, and 12 months after the completion of a treatment regime. | The Medical Diode Laser Hair Removal System is used for permanent reduction in hair regrowth defined as a long term, stable reduction in the number of hairs re-growing when measured at 6, 9 and 12 months after the completion of a treatment regimen. Use on all skin types (Fitzpatrick I-VI), including tanned skin. | SAME   |

Table 7-2 Performance Comparison

| ITEM                 | Proposed Device | Predicate Device<br>K211335 | Reference Device<br>K200525 | Remark |
|----------------------|-----------------|-----------------------------|-----------------------------|--------|
| Laser Type           | Diode Laser     | Diode Laser                 | Diode Laser                 | SAME   |
| Laser Classification | Class IV        | Class IV                    | Class IV                    | SAME   |
| Laser                | 808nm           | 808nm                       | 808nm                       | SAME   |

|                |                          |                                    |                                       |           |
|----------------|--------------------------|------------------------------------|---------------------------------------|-----------|
| Wavelength     |                          |                                    |                                       |           |
| Spot Size      | 15mm×15mm                | 2.25cm <sup>2</sup><br>(15mm×15mm) | 1.44cm <sup>2</sup><br>(1.2 x 1.2 cm) | SIMILAR   |
| Fluence        | 1-55.96J/cm <sup>2</sup> | 0-120J/cm <sup>2</sup>             | 48 J/cm <sup>2</sup>                  | Different |
| Frequency      | 1-10Hz                   | 1-10Hz                             | 1-10Hz                                | SAME      |
| Pulse Duration | 2-240ms                  | 10-400ms                           | 1-300ms                               | Different |
| Power Supply   | 110 VAC/50Hz-60Hz        | 220/110<br>VAC/50Hz-60Hz           | 220/110<br>VAC/50Hz-60Hz              | Different |
| Dimension      | 650mm×580mm×<br>1210mm   | 112 cm × 42 cm ×<br>60cm           | /                                     | Different |
| Weight         | 68Kg                     | 63Kg                               | /                                     | Different |

**Analysis:****Different - Fluence**

The proposed device has different Fluence from the predicate device.

For the difference on fluence between the predicate and proposed device(s), The Fluence of Predicted Device K211335 is 0-120J/cm<sup>2</sup>, while the proposed device is 55.96 J/cm<sup>2</sup>. It is lower than 120 J/cm<sup>2</sup>, the safety of the product is no problem. However, the effectiveness cannot be determined, so we selected Reference Device K200525 with the same intended use for Fluence comparison. The Fluence of the Reference Device is 48J/cm<sup>2</sup>, which is similar to the Fluence of the proposed device, so the effectiveness of the product is not affected. And the proposed device has passed the IEC60601-1 test, IEC60601-1-2 test, IEC60601-2-22 test, IEC60825-1 test and performance test, the safety and performance of the product can be ensured.

**Different - Pulse Duration**

The proposed device has different pulse duration from the predicate device.

For the difference on pulse duration between the predicate and proposed device(s), we can see that the pulse duration range of proposed device is within the range of the predicate device. The pulse duration between the proposed device and the predicate device only with minor difference. And we think this minor difference will not affect the effectiveness and safety. And the proposed device has passed the IEC60601-1 test, IEC60601-1-2 test, IEC60601-2-22 test, IEC60825-1 test and performance test, the safety and performance of the product can be ensured.

**Different - Power Supply**

The power supply for the proposed device is different from the predicate device. However, electrical safety and EMC test has been conducted on the proposed device and the test result shows that the device can work normally under this power supply. Therefore, this difference will not affect safety and effectiveness of the proposed device.

**Different - Dimension, Weight**

The proposed device is different in dimension and weight from the predicate device. By complying with IEC 60601-1, the mechanical performance of the proposed device is determined to be accepted, therefore,

this difference of dimension and weight have no effect the effectiveness and safety.

Table 7-3 Safety Comparison

| Item                                           | Proposed Device                         | Predicate Device<br>K211335             | Remark |
|------------------------------------------------|-----------------------------------------|-----------------------------------------|--------|
| EMC, Electrical and Laser Safety               |                                         |                                         |        |
| Electrical Safety                              | Comply with IEC 60601-1, IEC 60601-2-22 | Comply with IEC 60601-1, IEC 60601-2-22 | SAME   |
| EMC                                            | Comply with IEC 60601-1-2               | Comply with IEC 60601-1-2               | SAME   |
| Laser Safety                                   | Comply with IEC 60601-2-22, IEC 60825   | Comply with IEC 60601-2-22, IEC 60825   | SAME   |
| Patient Contact Materials and Biocompatibility |                                         |                                         |        |
| Cytotoxicity                                   | No Cytotoxicity                         | No Cytotoxicity                         | SAME   |
| Sensitization                                  | No evidence of sensitization            | No evidence of sensitization            | SAME   |
| Irritation                                     | No evidence of irritation               | No evidence of irritation               | SAME   |

#### 9. Non-Clinical Test Conclusion

Non clinical tests were conducted to verify that the proposed device met all design specifications as was Substantially Equivalent (SE) to the predicate device. The test results demonstrated that the proposed device complies with the following standards:

- IEC 60601-1 Edition 3.2 2020-08, Medical electrical equipment - Part 1: General requirements for basic safety and essential performance
- IEC 60601-1-2 Edition 4.1 2020-09, Medical Electrical Equipment-Part 1-2: General Requirements For Basic Safety And Essential Performance - Collateral Standard: Electromagnetic Compatibility-Requirements And Tests
- IEC 60825-1:2014, Safety of laser products - Part 1: Equipment classification, and requirements
- IEC 60601-2-22: 2012 Medical electrical equipment - Part 2-22: Particular requirements for basic safety and essential performance of surgical, cosmetic, therapeutic and diagnostic laser equipment
- ISO 10993-5: 2009 Biological Evaluation of Medical Devices -- Part 5: Tests For In Vitro Cytotoxicity
- ISO 10993-10 Fourth edition 2021, Biological evaluation of medical devices - Part 10: Tests for skin sensitization
- ISO 10993-23 First edition 2021-01, Biological evaluation of medical devices - Part 23: Tests for irritation

#### 10. Clinical Test Conclusion

No clinical study is included in this submission.

11. Substantially Equivalent (SE) Conclusion

Based on the nonclinical tests performed, the subject device is as safe, as effective, and performs as well as the legally marketed predicate device, Diode Laser Machine Model:BM-100 cleared under K211335.