



August 15, 2025

Heat In A Click LLC.  
% Cassie Lee  
Official Correspondent  
Guangzhou GLOMED Biological Technology Co., Ltd.  
2231, Building 1, Rui Feng Center, Kaichuang Road  
Huangpu District  
Guangzhou, Guangdong 510530  
China

Re: K251871

Trade/Device Name: FEATHER 01 02 03 04 (Model:01)  
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: OHS  
Dated: June 16, 2025  
Received: June 18, 2025

Dear Cassie Lee:

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.

All medical devices, including Class I and unclassified devices and combination product device constituent parts are required to be in compliance with the final Unique Device Identification System rule ("UDI Rule"). The UDI Rule requires, among other things, that a device bear a unique device identifier (UDI) on its label and package (21 CFR 801.20(a)) unless an exception or alternative applies (21 CFR 801.20(b)) and that the dates on the device label be formatted in accordance with 21 CFR 801.18. The UDI Rule (21 CFR 830.300(a) and 830.320(b)) also requires that certain information be submitted to the Global Unique Device Identification Database (GUDID) (21 CFR Part 830 Subpart E). For additional information on these requirements, please see the UDI System webpage at <https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/unique-device-identification-system-udi-system>.

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,

MARK  
MACIOS -S

Digitally signed by  
MARK MACIOS -S  
Date: 2025.08.15  
13:28:48 -04'00'

for 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

510(k) Number (if known)

K251871

Device Name

FEATHER 01 02 03 04 (Model:01)

Indications for Use (Describe)

The FEATHER 01 02 03 04 (Model: 01) is an Over the-Counter (OTC) device intended for the use in treating wrinkles on the face.

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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# 510(k) Summary for K251871

This summary of 510(k) safety and effectiveness information is being submitted in accordance with the requirement of 21 CFR 807.92.

## 1. Date of the summary prepared: August 6, 2025

## 2. Submitter's Information

Company Name: Heat In A Click LLC  
Establishment Registration Number: 3008929787  
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## Application Correspondent:

Contact Person: Cassie Lee  
Company Name: Guangzhou GLOMED Biological Technology Co., Ltd.  
Address: 2231, Building 1, Rui Feng Center, Kaichuang Road, Huangpu District, Guangzhou, Guangdong, China  
Tel: +86 20 8266 2446  
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## Subject Device Information

Classification Name: Laser surgical instrument for use in general and plastic surgery and in dermatology  
Common Name: Light based over the counter wrinkle reduction  
Trade Name: FEATHER 01 02 03 04  
Model Name: 01  
Review Panel: General & Plastic Surgery  
Product Code: OHS  
Regulation Number: 21 CFR 878.4810  
Regulatory Class: II

## 3. Predicate Device Information

### Predicate Device 1

Sponsor: Light Tree Ventures Europe B.V.  
Trade Name: LED Eye Perfector, model: EY-36A, EY-36B  
Trademark: CurrentBody Skin™  
Classification Name: Laser surgical instrument for use in general and plastic surgery and in dermatology  
Common Name: Light based over the counter wrinkle reduction  
510(k) Number: K221444  
Review Panel: General & Plastic Surgery  
Product Code: OHS  
Regulation Number: 21 CFR 878.4810  
Regulation Class: II

### Predicate Device 2

Sponsor: Light Tree Ventures Europe B.V.  
Trade Name: Q-Rejuvalight Pro Facewear  
Model Name: P19-0023  
Classification Name: Laser surgical instrument for use in general and plastic surgery and in dermatology

Common Name: Light Based Over The Counter Wrinkle Reduction(OHS), Over-The-Counter  
 Powered Light Based Laser For Acne(OLP)  
 510(k) Number: K230042  
 Review Panel: General & Plastic Surgery  
 Product Code: OHS, OLP  
 Regulation Number: 21 CFR 878.4810  
 Regulation Class: II

#### 4. Device Description

FEATHER 01 02 03 04 (Models: 01) is an over-the-counter light emitting diode (LED) device that emits energy for use in dermatology for the treatment of wrinkles. The device works by simultaneously emitting 630nm±10nm, 660nm±10nm, 850nm±10nm wavelengths for the treatment of wrinkles. There is only one power/control key on the device, press and hold it for 1.5s to turn on or off the device. Short press the button to adjust the intensity, the white indicator light means the device is running, the flash quickly indicator light means the device is low on power, the slow flashes indicator light means the device is charging.

#### 5. Intended Use / Indications for Use

The FEATHER 01 02 03 04 (Model: 01) is an Over the-Counter (OTC) device intended for the use in treating wrinkles on the face.

#### 6. Comparison to predicate device

Compare with predicate device, the subject device is very similar in design principle, intended use, indications for use, functions, material and the applicable standards. The differences between subject device and predicate device do not raise and new questions of safety or effectiveness.

| Elements of Comparison           | Subject Device                                                                                                                 | Predicate Device 1                                                                                                                                     | Predicate Device 2                                                                                                          | Remark         |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|----------------|
| Company                          | Heat In A Click LLC.                                                                                                           | Shenzhen Kaiyan Medical Equipment Co., Ltd                                                                                                             | Light Tree Ventures Europe B.V.                                                                                             | --             |
| Trade Name                       | FEATHER 01 02 03 04                                                                                                            | LED Eye Perfector, model: EY-36A, EY-36B                                                                                                               | Q-Rejuvalight Pro Facewear                                                                                                  | --             |
| 510(k) Number                    | K251871                                                                                                                        | K221444                                                                                                                                                | K230042                                                                                                                     | --             |
| Product Code                     | OHS                                                                                                                            | OHS                                                                                                                                                    | OHS, OLP                                                                                                                    | Same           |
| Regulation Number                | 21 CFR 878.4810                                                                                                                | 21 CFR 878.4810                                                                                                                                        | 21 CFR 878.4810                                                                                                             | Same           |
| FDA Device Classification        | Class II                                                                                                                       | Class II                                                                                                                                               | Class II                                                                                                                    | Same           |
| Intended use/ Indication for Use | The FEATHER 01 02 03 04 (Model: 01) is an Over the-Counter (OTC) device intended for the use in treating wrinkles on the face. | The LED Eye Perfector (Model: EY-36A, EY-36B) is an Over-the-Counter (OTC) device intended for use in treating wrinkles within the periorbital region. | The Q-Rejuvalight Pro Facewear (Model: P19-0023) is an Over-the-Counter (OTC) device intended for treatment of wrinkles and | Similar Note 1 |

| Elements of Comparison                | Subject Device                                                                                                 | Predicate Device 1                                                                                                      | Predicate Device 2                                                                           | Remark         |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------|
|                                       |                                                                                                                |                                                                                                                         | mild to moderate inflammatory acne.                                                          |                |
| Environment of Use                    | OTC                                                                                                            | OTC                                                                                                                     | OTC                                                                                          | Same           |
| Intended Location of Use              | Face                                                                                                           | Face (Periorbital region)                                                                                               | Face                                                                                         | Same           |
| Power Source                          | Lithium battery: 3.7V, 500mAh, 1.85Wh<br>Adapter Input: 100-110v., 50/60Hz<br>Adapter Output: 5V, 1A           | Main unit: 3.7V, 420mAh lithium battery, 1.55Wh<br>Adapter Input: 100~240V a.c., 50/60Hz<br>Adapter Output: 5V d.c., 1A | Li-ion Polymer Battery: 3.7V, 600mAh, 2.22Wh                                                 | Similar Note 2 |
| Indicators                            | Yes                                                                                                            | Yes                                                                                                                     | Yes                                                                                          | Same           |
| Wavelengths                           | 630nm±10nm;<br>660nm±10nm;<br>850nm±10nm                                                                       | EY-36A: 605nm, 633nm, 660nm, 830nm<br>EY-36B: 605nm, 625nm, 660nm, 880nm                                                | For Wrinkles: 605nm; 630nm; 660nm; 880nm;<br>For acne: 630nm; 415nm;                         | Similar Note 3 |
| Irradiance source                     | LEDs                                                                                                           | LEDs                                                                                                                    | LEDs                                                                                         | Same           |
| Total Intensity (mw/cm <sup>2</sup> ) | Max. 70 mw /cm <sup>2</sup>                                                                                    | 65 mw /cm <sup>2</sup>                                                                                                  | For Wrinkles: 70 mw /cm <sup>2</sup><br>For acne: 45 mw /cm <sup>2</sup>                     | Same           |
| Treatment time                        | 3 minutes per treatment                                                                                        | 3 minutes per treatment                                                                                                 | 3 minutes per treatment                                                                      | Same           |
| Safety and EMC                        | IEC 60601-1<br>IEC 60601-1-2<br>IEC 60601-1-11<br>IEC 60601-2-57<br>IEC 60601-2-83<br>IEC 62471<br>IEC 62133-2 | IEC 60601-1<br>IEC 60601-1-2<br>IEC 60601-1-11<br>IEC 60601-2-57<br>IEC 60601-2-83<br>IEC 62471                         | IEC 60601-1<br>IEC 60601-1-2<br>IEC 60601-1-11<br>IEC 60601-2-57<br>IEC 62471<br>IEC 62133-2 | Same           |

**Note 1:**

Although the “Intended use/Indication for Use” of the subject device is slightly different from the predicate device K221444 in description and the K230042 including acne treatment, all of them are designed to use same/similar treatment wavelengths for wrinkles treatment on the face with the same or similar irradiance source (LEDs) and intensity. So, the difference between the subject device and the predicate devices will not raise any safety or effectiveness issues.

**Note 2:**

Although the subject device's description in “Power supply” is slightly different from that of the predicate devices, all of them are powered by Lithium-Ion batteries, which comply with IEC 62133-2's requirements. Besides, both the subject device and the predicate devices conducted safety tests according to the IEC 60601 series standards, and the test results are in compliance with the safety standards' requirements. So, the difference between the subject device and the predicate device will not raise any safety or effectiveness issues.

**Note 3:**

Although the subject device's “Wavelengths” is slightly different from that of the predicate devices, the wavelengths used by the subject device can be fully covered by the predicate devices. Besides, the predicate devices (K221444 and K230042) and legally marketed devices (such as K232977, K222377) also demonstrate that red light in 605nm~690nm and infrared light in 820nm~930nm can be safely and effectively used in wrinkles treatment. Furthermore, all of them conducted safety and performance tests according to the IEC 60601 series standards, and the test results are in compliance with the IEC 60601 series standards requirements. So, the difference between the subject device and the predicate device will not raise any safety or effectiveness issues.

## **7. Test Summary**

### **7.1 Non-Clinical Tests Performed**

#### **1) Electrical safety, and electromagnetic compatibility Test**

Non-clinical tests were performed on the subject device in order to validate the design and to assure conformance with the following voluntary design standards in connection with medical device electrical safety, and electromagnetic compatibility:

- ♦ IEC 60601-1 2020-08 Edition 3.2 Medical electrical equipment - Part 1: General requirements for basic safety and essential performance
- ♦ IEC 60601-1-11 Edition 2.1 2020-07 Medical Electrical Equipment - Part 1: 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.
- ♦ IEC 60601-2-57 Edition 2.0 2023-07 Medical Electrical Equipment - Part 2-57: Particular requirements for the basic safety and essential performance of non-laser light source equipment intended for therapeutic, diagnostic, monitoring and cosmetic/aesthetic use.
- ♦ 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 disturbances - Requirements and tests.
- ♦ IEC 60601-2-83 Edition 1.1 2022-12 Medical electrical equipment - Part 2-83: Particular requirements for the basic safety and essential performance of home light therapy equipment.
- ♦ IEC 62133-2 Edition 5.0 2021-09 Secondary cells and batteries containing alkaline or other non-acid electrolytes - Safety requirements for portable sealed secondary cells, and for batteries made from them, for use in portable applications – Part 2: Lithium systems.
- ♦ IEC 62471 Edition 1.0 2006-07 Photobiological safety of lamps and lamp systems

#### **2) Software verification and validation**

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.” The software for this device was considered as a Basic level concern, since a malfunction of, or a latent design flaw in, the Software Device leads to an erroneous diagnosis or a delay in delivery of appropriate medical care that would likely lead to Minor Injury.

### **3) Usability validation**

Usability testing was conducted on the FEATHER 01 02 03 04 (Models:01), which complies with IEC 62366-1 and IEC 60601-1-6.

### **7.2 Summary of Clinical Performance**

Clinical testing was not needed for this 510(k). The non-clinical performance testing described above is sufficient to support that the device can be used safely and effectively.

### **8. Final Conclusion:**

The subject device is as safe, as effective, and performs as well as or better than the legally marketed predicated device K221444 and K230042.