



March 12, 2026

Nanjing Mijo Technology Co., Ltd.
% Luna Hu
Primary Correspondent
Shanghai SUNGO Management Consulting Co., Ltd.
Rm. 1401, Dongfang Bldg., 1500# Century Ave.
Shanghai, 200122
China

Re: K253936
Trade/Device Name: Power Mobility Scooter (MJMA01, MJMA02)
Regulation Number: 21 CFR 890.3800
Regulation Name: Motorized Three-Wheeled Vehicle
Regulatory Class: Class II
Product Code: INI
Dated: December 9, 2025
Received: December 9, 2025

Dear Luna Hu:

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 Management System Regulation (QMSR) (21 CFR Part 820), which includes, but is not limited to, ISO 13485 clause 7.3 (Design controls), ISO 13485 clause 8.3 (Nonconforming product), and ISO 13485 clause 8.5 (Corrective and preventative action). Please note that regardless of whether a change requires premarket review, the QMSR requires device manufacturers to review and approve changes to device design and production (ISO 13485 clause 7.3 and 21 CFR 820.70) and document changes and approvals in the Medical Device File (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 Management System Regulation (QMSR) (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) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Tushar Bansal -S

Tushar Bansal, PhD

Acting Assistant Director, Acute Injury Devices Team

DHT5B: Division of Neuromodulation and

Physical Medicine Devices

OHT5: Office of Neurological and

Physical Medicine Devices

Office of Product Evaluation and Quality

Center for Devices and Radiological Health

Indications for Use

Please type in the marketing application/submission number, if it is known. This textbox will be left blank for original applications/submissions.

K253936

?

Please provide the device trade name(s).

?

Power Mobility Scooter (MJMA01, MJMA02)

Please provide your Indications for Use below.

?

It is a motor driven, indoor and outdoor transportation vehicle with the intended use to provide mobility to a disabled or elderly person limited to a seated position.

Please select the types of uses (select one or both, as applicable).

- ☐ Prescription Use (Part 21 CFR 801 Subpart D)
☒ Over-The-Counter Use (21 CFR 801 Subpart C)

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510(k) Summary

Document Prepared Date: 2025/12/8

1. Applicant

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2. Device

Trade name: Power Mobility Scooter (MJMA01, MJMA02)

Classification name: Motorized three-wheeled vehicle

Regulatory Information

Classification: Class II

Product code: INI

Regulation Number: 890.3800

Review Panel: Physical Medicine

3. Predicate Device

Manufacturer: Zhejiang Innuovo Rehabilitation Devices Co., Ltd.

Product Name: Mobility Scooter (W3431D)

510(K) #: K231428

4. Indication for Use

It is a motor driven, indoor and outdoor transportation vehicle with the intended use to provide mobility to a disabled or elderly person limited to a seated position.

5. Device Description

The sample is a Mobility Scooter which provides mobility to a disabled or elderly person limited to a seated position.

This product is primarily for indoor use and the outdoor.

The Mobility Scooter is classified in the Class B and the maximum loading weight is 120kg.

The scooter is a battery powered four wheeled vehicle.

It consists one Lithium-ion battery with an off-board battery charger, frame, controllers, motors, seat, back support, control device (including power switch & speed adjustment, horn switch, throttle & brake, handlebars, head lamp switch, real-time speed, power), two rear wheels, two front wheels, foot support(pedal), anti-tip devices.

For convenience of transportation and reduction of possible damage, the battery can be dismantled and separately packaged.

Users can also easily assemble these parts without use of the tools.

MJMA01 is not equipped with armrests, while MJMA02 is equipped with armrests. That is the only difference between the 2 models.

6. 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:

- 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 10993-23:2021 Biological Evaluation of Medical Devices -- Part 23: Test for Intracutaneous Reactivity
- ISO 7176-1:2014, Wheelchairs - Part 1: Determination of static stability
- ISO 7176-2:2017, Wheelchairs - Part 2: Determination of dynamic stability of electrically powered wheelchairs
- ISO 7176-3:2012, Wheelchairs - Part 3: Determination of effectiveness of brakes
- ISO 7176-4:2008, Wheelchairs - Part 4: Energy consumption of electric wheelchairs and scooters for determination of theoretical distance range
- ISO 7176-5:2008, Wheelchairs - Part 5: Determination of overall dimensions, mass and manoeuvring space

- ISO 7176-6:2018, Wheelchairs - Part 6: Determination of maximum speed, acceleration and deceleration of electrically powered wheelchairs
- ISO 7176-7:1998, Wheelchairs - Part 7: Measurement of seating and wheel dimensions
- ISO 7176-8:2014, Wheelchairs -Part 8: Requirements and test methods for static, impact and fatigue strengths
- ISO 7176-9:2009, Wheelchairs - Part 9: Climatic tests for electric wheelchairs
- ISO 7176-10:2008, Wheelchairs - Part 10: Determination of obstacle-climbing ability of electrically powered wheelchairs
- ISO 7176-11:2012 Wheelchairs - Part 11: Test dummies
- ISO 7176-13:1989, Wheelchairs - Part 13: Determination of coefficient of friction of test surfaces
- ISO 7176-14:2008, Wheelchairs - Part 14: Power and control systems for electrically powered wheelchairs and scooters - Requirements and test methods
- ISO 7176-15:1996, Wheelchairs - Part 15: Requirements for information disclosure, documentation and labeling
- ISO 7176-25:2013 Wheelchairs - Part 25: Batteries and chargers for powered wheelchairs
- ISO 16840-10: 2021 Wheelchair seating - Part 10: Resistance to ignition of postural support devices - Requirements and test method
- ISO 7176-21:2009 Wheelchairs - Part 21: Requirements and test methods for electromagnetic compatibility of electrically powered wheelchairs and scooters, and battery chargers
- IEC 60601-1-2:2014+A1:2020 Medical electrical equipment - Part 1-2: General requirements for basic safety and essential performance - Collateral Standard: Electromagnetic disturbances - Requirements and tests

7. Clinical Test Conclusion

No animal study and clinical studies are available for our device. Clinical testing was not required to demonstrate the substantial equivalence of the electric wheelchair to its predicate device.

8. Comparison technological characteristics with the predicate device

Table 1 General Comparison

Elements of Comparison	Subject Device (K253936)	Predicate Device (K231428)	Remark
Manufacturer	Nanjing Mijo Technology Co., Ltd.	Zhejiang Innuovo Rehabilitation Devices Co.,Ltd.	--
Device name	Power Mobility Scooter	Mobility Scooter	--
Model(s)	MJMA01 MJMA02	W3431D	--
Indication for use	It is a motor driven, indoor and outdoor transportation vehicle	It is a motor driven, indoor and outdoor transportation vehicle	Same

	with the intended use to provide mobility to a disabled or elderly person limited to a seated position	with the intended use to provide mobility to a disabled or elderly person limited to a seated position.	
Overall dimension (mm)	1000 x 600 x 900	1020 x 500 x 840	Similar
Frame Material	Aluminium alloy	Steel	Different
Front wheel diameter	193mm	190mm	Similar
Front Wheels Quantity	2	2	Same
Rear wheel diameter	193mm	190mm	Similar
Rear Wheels Quantity	2	2	Same
Ground clearance	50mm	45mm	Similar
Max Loading(on level ground)	120KG	120KG	Same
Turn Radius	1125mm	1650mm	Similar
Motor output	24 V 250W	24 V 180W	Similar
Drive System	Rear Wheel Drive	Rear Wheel Drive	Same
Brakes	Electromagnetic brake	Electromagnetic brake	Same
Battery	Li-ion battery 24V5.8Ah*2	Lead-acid 12V12Ah*2	Different
Charger	29.4V, 2A	24V, 2A	Different
Max Speed	6.84km/h	6km/h	Similar
Max Slope	10°	9°	Similar
Travel Distance	16.3km	15km	Similar
Time to brake	< 0.65 s	0.7-1s	Similar
Brake Distance-Normal operation (Horizontal-Forward-Max speed)	≤1.2m	≤1.5m	Similar
Total mass	29KG/31KG	42KG	Different
Operating surface & environment	Indoor use and restricted outdoor use on pavements or paved footpaths only.	Indoor use and restricted outdoor use on pavements or paved footpaths only.	Same
Remote control	No	No	Same

Difference analysis

The design and technological characteristics of the proposed device scooter is similar to the predicate device. There are minor differences between the devices in frame material, size, weight, ground clearance, turn radius, motor output, battery, max speed, max slope, travel distance, brake distance and time to brake. All of the parameters with differences have been tested according to ISO7176 series standards and the test records support its safety and effectiveness. There is no deleterious effect on safety and effectiveness due to the minor differences do not influence the intended use of the device. Therefore, the proposed Scooter is substantially equivalent (SE) to The Scooter (K231428).

Table 2 safety comparison

Item	Subject Device	Predicate Device (K231428)	Results
Biocompatibility	All user directly contacting materials are compliance with ISO10993-1	All user directly contacting materials are compliance with ISO10993-1	Same
EMC	ISO7176-21& IEC 60601-1-2:2014+A1:2020 &IEC TR 60601-4-2:2016	ISO7176-21& IEC 60601-1-2:2014+A1:2020	Same
Performance	ISO7176 series	ISO7176 series	Same
Label and labeling	Conforms to FDA Regulatory	Conforms to FDA Regulatory	Same

Item	Subject Device	Predicate Device (K231428)	Results
ISO7176-1	The Static stability has been determined after the testing according to the ISO 7176-1, and test results meet its design specification.	The Static stability has been determined after the testing according to the ISO 7176-1, and test results meet its design specification.	Same
ISO7176-2	The dynamic stability has been determined after the testing according to the ISO 7176-2, and test results meet its design specification.	The dynamic stability has been determined after the testing according to the ISO 7176-2, and test results meet its design specification.	Same
ISO7176-3	The effectiveness of brakes has been determined after the testing according to the ISO 7176-3, and test results meet its design specification.	The effectiveness of brakes has been determined after the testing according to the ISO 7176-3, and test results meet its design specification.	Same
ISO7176-4	The theoretical distance range has been determined after the testing according to the ISO 7176-4, and test results meet its design specification.	The theoretical distance range has been determined after the testing according to the ISO 7176-4, and test results meet its design specification.	Same
ISO7176-5	The dimensions, mass has been determined after the testing according to the ISO 7176-5.	The dimensions, mass has been determined after the testing according to the ISO 7176-5.	Same
ISO7176-6	The maximum speed, acceleration and deceleration has been determined after the testing according to the ISO 7176-6.	The maximum speed, acceleration and deceleration has been determined after the testing according to the ISO 7176-6.	Same

ISO7176-7	The seating and wheel dimensions has been determined after the testing according to the ISO 7176-7.	The seating and wheel dimensions has been determined after the testing according to the ISO 7176-7.	Same
ISO7176-8	All test results meet the requirements in Clause 4 of ISO 7176-8.	All test results meet the requirements in Clause 4 of ISO 7176-8.	Same
ISO7176-9	The test results shown that the device under tests could continue to function according to manufacturer's specification after being subjected to each of the tests specified in Clause 8 of ISO 7176-9.	The test results shown that the device under tests could continue to function according to manufacturer's specification after being subjected to each of the tests specified in Clause 8 of ISO 7176-9.	Same
ISO7176-10	The obstacle-climbing ability of device has been determined after the testing according to the ISO 7176-10.	The obstacle-climbing ability of device has been determined after the testing according to the ISO 7176-10.	Same
ISO7176-11	The test dummies used in the testing of ISO 7176 series are meet the requirements of ISO 7176-11.	The test dummies used in the testing of ISO 7176 series are meet the requirements of ISO 7176-11.	Same
ISO7176-13	The coefficient of friction of test surfaces has been determined, which could be used in other 7176 series tests involved.	The coefficient of friction of test surfaces has been determined, which could be used in other 7176 series tests involved.	Same
ISO7176-14	All test results meet the requirements in Clause 7, 8, 9, 10, 11, 12, 13, 14, 15, 17 of ISO 7176-14.	All test results meet the requirements in Clause 7, 8, 9, 10, 11, 12, 13, 14, 15, 17 of ISO 7176-14.	Same
ISO7176-15	The test results shown that information disclosure, documentation and labelling of device meet the requirements of ISO 7176-15.	The test results shown that information disclosure, documentation and labelling of device meet the requirements of ISO 7176-15.	Same
ISO7176-16	The performance of resistance to ignition meet the requirements of ISO 7176-16.	The performance of resistance to ignition meet the requirements of ISO 7176-16.	Same
ISO7176-21	The EMC performance results meet the requirements of ISO	The EMC performance results meet the requirements of ISO	Same

	7176-21, IEC 60601-1-2:2014+A1:2020 and IEC TR 60601-4-2:2016.	7176-21, IEC 60601-1-2:2014+A1:2020.	
ISO7176-25	The performance of batteries and charger of device meet the requirements in Clause 5 and 6 of ISO 7176-25.	The performance of batteries and charger of device meet the requirements in Clause 5 and 6 of ISO 7176-25.	Same

9.Conclusion

The conclusion drawn from the nonclinical tests demonstrates that the subject device in 510(K) submission, the proposed Power Mobility scooter,model:MJMA01/MJMA02, is as safe, as effective, and performs as well as the legally marketed predicate device cleared under K231428.