

MAY - 1 2003

510(K) Summary

K031202

BRAEBON Medical Corporation MEDIPalm-20™

March 20, 2003

The following safety and effectiveness summary has been prepared according to the requirement for 510(k) summaries specified in 21 CFR 807.92c.

1.0 Manufacturer Name

BRAEBON Medical Corporation
120 Walgreen Drive
Suite 1, RR#3
Carp, Ontario
Canada, K0A 1L0

2.0 Proprietary Name of Device

MEDIPalm-20™

3.0 Common Name of Device

Electroencephlograh/polysomnograph

4.0 Device Classification

Devices of this type have been classified as class II by the Neurology Devices Panel. Devices of this classification have a classification code of **OLV** Electroencephalograph (21 CFR 882.1400).

5.0 Intended Use

The BRAEBON Medical Corporation MEDIPalm-20™ is intended for use in collecting, recording and displaying physiological data from FDA-cleared sensors during sleep disorder studies in both a clinical and home environment and for transmitting this data to an electrically isolated FDA-cleared polysomnographic analysis station for analysis.

The target population of the MEDIPalm-20™ is all children and adult patients who are screened during sleep disorder studies. The majority of the screenings occur at a sleep laboratory but may occur at the patient's house through the use of the MEDIPalm-20™.

The MEDIPalm-20™ is intended to be used only by or on the order of a physician.

6.0 Device Description

The MEDIPalm-20™ is a hand-held recording device capable of acquiring and storing physiological signals from FDA-cleared sensors and transmitting the physiological data to a computer through the Universal Serial Bus (USB) port.

The MEDIPalm-20™ records up to 16 channels of physiological signals: any combination of eight differential analog channels of electroencephalogram (EEG), electrooculogram (EOG), electromyogram (EMG), and electrocardiogram (EKG) signals; as well as chest effort; abdominal effort; airflow pressure; snoring; body position; arterial oxygen saturation (SaO2); pulse rate; and SaO2 probe status. The signals can be viewed in real time on a built-in LCD or on a remote computer. The data can be downloaded after collection for analysis on any FDA-cleared polysomnographic analysis station capable of reading European Data Formatted files.

The MEDIPalm-20™ is powered by either two standard AA batteries, a Medical Grade IEC 60601-1 compliant AC/DC power supply, or an electrically isolated computer that uses an IEC 60601-1 compliant isolation transformer and connects to the MEDIPalm-20™ via the MEDIPalm USB data and power cable. To protect the patient when the MEDIPalm-20™ is used with a computer, the computer and all its peripherals must be connected to an IEC 60601-1 compliant isolation transformer. The sensors connect to the patient and the MEDIPalm-20™. The MEDIPalm-20™ does not contain any patient contacting materials.

7.0 Predicate Device Equivalence

We are claiming substantial equivalence to the following devices:

Airsep Corp.	Monet	K001013
EB Neuro. S.P.A.	Sandman Digital	K003154
Nellcor Puritan Bennett	Suzanne	K990565
Nonin Medical, Inc.	PalmSAT, Model 2500 Pulse Oximeter with finger probes	K002690
BRAEBON Medical Corporation	Ultima Smartbelt	K001743
BRAEBON Medical Corporation	Ultima Airflow Pressure Sensor	K984431

8.0 Similarities and Differences Between Subject and Predicate Devices

Intended Use	No difference
Indications Statement	No difference
Method of Connection to Patient	No difference
Power Source	No significant difference. The MEDIPalm-20™, like the predicate devices, is powered by batteries or a Medical Grade IEC 60601-1 compliant AC/DC power supply. The MEDIPalm-20™ can also be powered using the MEDIPalm Universal Serial Bus (USB) data cable. When using the MEDIPalm-20™ with the computer, the computer and all its peripherals must be connected to an IEC 60601-1 compliant isolation transformer to protect the patient.
Safety Characteristics	No difference.
Reuse and Hygiene Characteristics	No difference.
Design	No difference. The MEDIPalm-20™ incorporates the headbox, respiratory effort sensor, airflow pressure sensor, and pulse oximeter into one palm-sized case rather than multiple cases.
Performance Data Conclusions	No difference.

9.0 Performance Testing

Functional testing was performed to confirm that *MEDI*Palm*-20™* is capable of meeting its stated performance specifications and that the device output is readable. *MEDI*Palm*-20™* passed all tests.

All software testing was performed in accordance with the May 29, 1998 "Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices" published by the Office of Device Evaluation. The *MEDI*Palm*-20™* passed all tests.

All software verification and validation testing was performed in accordance with the January 11, 2002 "General Principles of Software Validation; Final Guidance for Industry and FDA Staff." The *MEDI*Palm*-20™* passed all tests.

All environmental and electrical safety testing was performed in accordance with the November 03, 1997 "Electroencephalograph Devices Guidance for 510(k) Content." The *MEDI*Palm*-20™* passed all tests.

No clinical studies were required to support a substantial equivalence determination. The *MEDI*Palm*-20™* was connected to a healthy person and was run to verify that readable, appropriate signals were being recorded. Simulation tests comparing the *MEDI*Palm*-20™* and the Sandman Digital were also performed to gather comparative performance data. The performance of the BRAEBON Medical Corporation *MEDI*Palm*-20™* (subject device) was identical to that of Sandman Digital Recording System (predicate device).

10.0 Conclusions

We conclude that *MEDI*Palm*-20™* is equivalent in safety and performance to the legally marketed predicate devices. The *MEDI*Palm*-20™* meets its stated performance specifications and the criteria outlined in the Reviewers Guidance publication specified above, and the *MEDI*Palm*-20™* will operate safely in the intended environment and fulfill its intended use.



Food and Drug Administration
10903 New Hampshire Avenue
Document Control Room - WO66-G609
Silver Spring, MD 20993-0002

Braebon Medical Corporation
% Mr. Neil E. Devine, Jr.
Entela, Incorporated
3033 Madison Avenue, SE
Grand Rapids, Michigan 49548

APR - 9 2012

Re: K031202
Trade/Device Name: MEDIPalm-20™
Regulation Number: 21 CFR 882.1400
Regulation Name: Electroencephalograph
Regulatory Class: II
Product Code: OLV
Dated (Date on orig SE ltr): April 16, 2003
Received (Date on orig SE ltr): April 16, 2003

Dear Mr. Devine:

This letter corrects our substantially equivalent letter of May 1, 2003.

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 (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. 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.

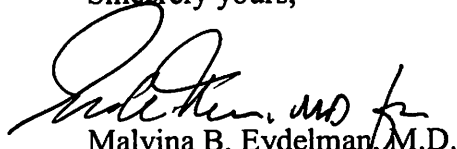
If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

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); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to <http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,



Malvina B. Eydelman, M.D.
Director
Division of Ophthalmic, Neurological,
and Ear, Nose and Throat Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

Indications for Use Statement

510 (k) Number K 031202 ~~(To be assigned)~~

Device Name: MEDIPalm-20™
Indications for Use: The MEDIPalm-20™ is a portable data recorder used to collect physiological signals for transfer to an FDA-cleared polysomnographic analysis station capable of reading European Data Format (.edf) files.
Target Population: Children and adult patients who are screened during sleep disorder studies
Environment of Use: The majority of the screenings occur at a sleep laboratory, hospital or at the patient's home.

Concurrence of CDRH, Office of Device Evaluation (ODE)

Miriam C. Provost
(Division Sign-Off)
Division of General, Restorative
and Neurological Devices

510(k) Number K031202

Prescription Use OR Over-The-Counter Use
(Per 21 CFR 801.109)