

FEB 25 2010

510(K) SUMMARY

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

The Assigned 510(k) number is: **k093592**

1. Submitter's Identification:

TaiDoc Technology Corporation  
6F, No.127, Wugong 2nd Rd., Wugu Township, Taipei County, 248, Taiwan

Correspondence:

Debra Liang  
Regulatory Affairs Specialist  
Tel: +886-2-6625-8188 #1198  
Fax: +886-2-6625-0288  
Email: [debra.liang@taidoc.com.tw](mailto:debra.liang@taidoc.com.tw)

2. Device name:

Proprietary name: ADVOCATE Redi-Code Duo Blood Glucose plus Blood Pressure Monitoring System, model no. TD-3223E

Regulatory information:

- A. Regulation section: 21 CFR § 862.1345, Glucose Test System  
21 CFR §870.1130, Noninvasive blood pressure measurement system
- B. Classification: Class II (Glucose Test System)  
Class II (Blood Pressure Measurement System)
- C. Product Code: NBW, System, Test, Blood Glucose, Over The Counter  
CGA, Glucose Oxidase, Glucose  
DXN, System, Measurement, Blood-Pressure, Non-Invasive
- D. Panel: 75, Clinical Chemistry – Glucose Test System  
74, Cardiovascular – Blood Pressure Measurement System

3. Intended Use:

ADVOCATE Redi-Code Duo Blood Glucose plus Blood Pressure Monitoring System, model no. TD-3223E is intended for use in the quantitative measurement of glucose in fresh capillary whole blood from the finger and from the following alternative sites: the palm, forearm, upper-arm, calf and thigh. It is intended for use by healthcare professionals and people with diabetes mellitus at home as an aid in monitoring the effectiveness of diabetes control program. The alternative site testing in the system can be used only during steady-state blood glucose conditions.

The system is also intended to measure non-invasively the systolic and diastolic blood pressure and pulse rate. The blood pressure is measured by using a technique in which an inflatable cuff is wrapped around the wrist. The cuff circumference is limited to 5.25" to 7.75".

The device is not to be used for the diagnosis or screening of diabetes, hypertension or for testing on neonates.

4. Device Description:

The kit of ADVOCATE Redi-Code Duo Blood Glucose plus Blood Pressure Monitoring System consist of four main products: the monitor features both the blood glucose and blood pressure measurement functions, test strips, control solutions (cleared under k041107), and the lancet device. These products have been designed and tested to work together as a system to produce accurate blood glucose test results.

5. Substantial Equivalence Information:

A. Predicate device name:

ADVOCATE DUO blood glucose plus blood pressure monitoring system

B. Predicate K number: K070641

C. Comparison with predicate:

The modified ADVOCATE Redi-Code Duo Blood Glucose plus Blood Pressure Monitoring System has the following similarities to the predicate device:

- same operating principle,
- same fundamental scientific technology,
- incorporate the same basic circuit design,

- incorporate the same materials,
- same shelf life
- packaged using the same materials, and
- Manufactured by the same process.

The modifications encompass:

- A modification in the software of the glucose meter
- Modification in the physical appearance
- Labeling change due to the software modification

6. Test Principle:

For blood glucose, the detection and measurement is by an electrochemical biosensor technology using glucose oxidase.

For blood pressure, the measurement is by using oscillometric, non-invasive blood pressure (systolic and diastolic) measuring technology.

7. Performance Characteristics:

The ADVOCATE Redi-Code Duo Blood Glucose plus Blood Pressure Monitoring System has the same performance characteristics as the predicate device.

Software verification and validation testing confirmed that the performance, safety and effectiveness of the ADVOCATE Redi-Code Duo Blood Glucose plus Blood Pressure Monitoring System is equivalent to the predicate device.

8. Conclusion:

Based on the information provided in this submission, the ADVOCATE Redi-Code Duo Blood Glucose plus Blood Pressure Monitoring System is substantially equivalent to the predicate ADVOCATE DUO blood glucose plus blood pressure monitoring system.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration  
10903 New Hampshire Avenue  
Document Mail Center – WO66-0609  
Silver Spring, MD 20993-0002

TaiDoc Technology Corporation  
c/o Debra Liang  
6F, No. 127, Wugong 2<sup>nd</sup> Rd., Wugu Township  
Taipei County, China (Taiwan) 248

FEB 25 2010

Re: k093592  
Trade Name: ADVOCATE Redi-Code Duo Blood Glucose plus Blood Pressure  
Monitoring System, model TD-3223E  
Regulation Number: 21 CFR 862.1345  
Regulation Name: Glucose Test System  
Regulatory Class: Class II  
Product Code: NBW, CGA, DXN  
Dated: January 18, 2010  
Received: January 26, 2010

Dear Ms. Liang:

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 application (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 such additional controls. Existing major regulations affecting your device can be found in Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. 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 Parts 801 and 809); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); and good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820).

Page 2

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of *In Vitro* Diagnostic Device Evaluation and Safety at (301) 796-5450. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at (301) 796-5760. 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 ) 796-5680 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'CCH', with a long horizontal flourish extending to the right.

Courtney C. Harper, Ph.D.  
Director  
Division of Chemistry and Toxicology  
Office of *In Vitro* Diagnostic Device  
Evaluation and Safety  
Center for Devices and Radiological Health

Enclosure

