Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

U.S. Department of Health & Human Services

Food and Drug Administration

SAVE REQUEST

USER:	(cwf)
FOLDER:	K020399 - 270 pages
COMPANY:	INTERCURE LTD. (INTERCURE)
PRODUCT:	DEVICE, BIOFEEDBACK (HCC)
SUMMARY:	Product: RESPERATE; MODEL RR-150
DATE REQUESTED:	Jan 21, 2016
DATE PRINTED:	Jan 21, 2016
Note:	Printed

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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JUL - 2 2002

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ATTACHMENT 9

510(k) Summary For The InterCure Ltd. RESPeRATE

Submitter's Name, Address, Telephone Number, and Contact Person

InterCure Ltd.

9 Hamelacha st. Kislev building

Northern Industrial area, Lod, 71520 Israel

Contact:	Dr. Benjamin Gavish Chief Scientist, InterCure Ltd.
Phone:	972-8-9212126
Facsimile:	972-8-9204001
Email:	bgavish@intercure.com

Date Prepared: January 2002

Name of the Device

RESPeRATE

Common or Usual Name

Biofeedback Device

Predicate Device

Respi-Low Model RL-108 (K000495) manufactured by InterCure Ltd.;

Intended Use

The RESPeRATE is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions.

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Summary of the Basis for the Finding of Substantial Equivalence

The RESPeRATE is substantially equivalent to InterCure's previously cleared Respi-Low biofeedback device (K000495) for use in stress reduction and adjunctive treatment to reduce blood pressure. The device shares the same general intended use in relaxation and/or stress reduction and the same indications for use except for OTC use. Moreover, the principles of operation are identical to the predicate device and there are only minor differences in technological characteristics. Clinical testing in the OTC setting has shown that the RESPeRATE device can be properly used without the direction of a physician. This difference in the specific indications for use of the RESPeRATE (for OTC use) compared to the predicate (for prescription use), however, does not raise new questions of safety or efficacy and does not alter its therapeutic effect. Moreover, the clinical study demonstrated a safe, clinically significant, reduction in high blood pressure with use of the RESPeRATE over a period of 8 weeks without the guidance of a physician. Therefore, the devices are substantially equivalent.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

JUL - 2 2002

InterCure LTD.
c/o Jonathan S. Kahan
Hogan and Hartson, L.L.P.
555 13th Street, N.W.
Washington, D.C. 20004-1109

Re: K020399
Trade Name: RESPeRATE
Regulation Number: 882.5050
Regulation Name: Biofeedback device
Regulatory Class: II
Product Code: HCC
Dated: May 9, 2002
Received: May 9, 2002

Dear Mr. Kahan:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to 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 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); 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.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 21 CFR Part 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4659. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/dsma/dsmamain.html

Sincerely yours,

for Celia M. Witten, Ph.D., M.D.
Director
Division of General, Restorative
and Neurological Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

510(k) Number (if known): K020399

Device Name: **InterCure Ltd. RESPeRATE**

Indications for Use:

The RESPeRATE is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions.

(PLEASE DO NOT WRITE BELOW THIS LINE -- CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use ____ OR Over-The-Counter Use X

(Per 21 C.F.R. 801.109)
(*Optional Format 1-2-96*)

(Division Sign-Off)
Division of General, Restorative
and Neurological Devices

510(k) Number K020399

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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K020399/A1

HOGAN & HARTSON

L.L.P.

April 22, 2002

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BY HAND DELIVERY

510(k) Document Mail Center (HFZ-401)
Center for Devices and Radiological Health
Food and Drug Administration
9200 Corporate Boulevard
Rockville, Maryland 20850

Attention: Richard Felten, General Surgery Devices Branch (HFZ-410)

RECEIVED
APR 22 12 18 PM
FDA/CDRH/OCE/DMC

Re: Amendment – 510(k) Premarket Notification for InterCure Ltd.'s RESP*e*RATE Biofeedback Device (K020399)

Dear Mr. Felten:

On behalf of our client, InterCure Ltd. ("InterCure" or "the company"), we hereby submit additional information relating to InterCure's 510(k) premarket notification for its RESPeRATE biofeedback device ("RESP*e*RATE") (K020399) for over-the-counter use as requested during our conference calls on April 18 and 19, 2002. The information contained herein was provided by InterCure to Hogan & Hartson for submission to the Food and Drug Administration ("FDA") and InterCure is solely responsible for the accuracy and completeness of this submission.

As requested, the following revised language will be placed on the RESPeRATE box and on the introduction page of the User Manual:

> Please Note: RESP*e*RATE should only be used as a part of your overall health program for achieving goal blood pressure, as recommended by your doctor. RESP*e*RATE can be safely used in conjunction with medication and lifestyle modifications such as diet and exercise.

We have provided a sample box for your review as well as the introduction page of the User Manual. On the box, the above boxed language will

BERLIN BRUSSELS LONDON PARIS BUDAPEST PRAGUE WARSAW MOSCOW TOKYO
NEW YORK BALTIMORE MILAN MIAMI DENVER BOULDER COLORADO SPRINGS LOS ANGELES

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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be printed on a label and affixed over the prescription caution (*i.e.,* "CAUTION: Federal law restricts the RESP*e*RATE device to sale by or on the order of a physician"). In addition, the introduction page for the User Manual will be revised to bear the above language by adhering a sticker to the top of the introduction page of the User Manual (*see* **Attachment 1**). At the next printing of the User Manual, the boxed language will be integrated into the text of the introduction.

If you have any additional questions or concerns regarding this submission please contact me at the above number. Upon a finding of substantial equivalence please fax a copy of the notification letter to us at (202)-637-5910.

Sincerely,

Jonathan Kahan

Jonathan S. Kahan

Attachments

ccs: Paul Sheils, InterCure USA
Erez Gavish, InterCure Ltd.
Gerard J. Prud'homme, Esq.
Jodi K. Scott, Esq.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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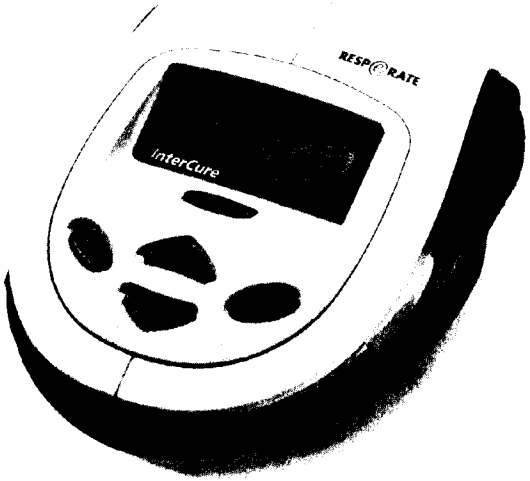
Please Note: RESPeRATE should only be used as a part of your overall health program for achieving goal blood pressure, as recommended by your doctor. RESPeRATE can be safely used in conjunction with medication and lifestyle modifications such as diet and exercise.



Introduction

Congratulations! **RESPeRATE TO LOWER BLOOD PRESSURE**, will help you take an active step toward improved treatment of your high blood pressure. Please read this *User Manual* carefully and completely. It includes everything you need to know to help you to maximize the benefits of using **RESPeRATE TO LOWER BLOOD PRESSURE.**

Scientific evidence has shown that breathing exercises, when performed routinely, can lower blood pressure. These exercises are virtually impossible without continuous, individualized coaching. Using a patented technology, **RESPeRATE** provides this coaching in an extremely effective way.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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K020399/A2

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HOGAN & HARTSON L.L.P.

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June 19, 2002

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510(k) Document Mail Center (HFZ-401)
Center for Devices and Radiological Health
Food and Drug Administration
9200 Corporate Boulevard
Rockville, Maryland 20850

Attention: Richard Felten, General Surgery Devices Branch (HFZ-410)

Re: Amendment – 510(k) Premarket Notification for InterCure Ltd.'s RESPeRATE Biofeedback Device (K020399)

Dear Mr. Felten:

On behalf of our client, InterCure Ltd. ("InterCure" or "the company"), we hereby submit additional information relating to InterCure's 510(k) premarket notification for its RESPeRATE Biofeedback Device ("RESPeRATE") (K020399). The information provided in this amendment is in response to FDA's requests for additional information conveyed to the company by Richard Felten via facsimile on May 3, 2002 and June 11, 2002 and as discussed during a teleconference on June 12, 2002. The information contained herein was provided by InterCure to Hogan & Hartson L.L.P. for submission to the Food and Drug Administration ("FDA" or "the agency") and InterCure is solely responsible for the accuracy and completeness of this submission.

For clarity, each of FDA's requests is restated below, followed in each case by the company's response. Where revised language is provided, the existing language has been redlined for ease of review.

I. MAY 2, 2002 REQUEST FOR ADDITIONAL INFORMATION

Item One: *It is felt that the information placed on the box should conform to the same information contained in the Operator Manual. The Getting Started guide has a section titled Ten Steps to Lower Blood Pressure, yet the box cover gives only 4 steps under a section titled Easy to Use.*

SK40

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Response One: The back panel of the box has been revised to state the following and include a note to refer to the User's Manual for more detail:

Easy to Use

RESPeRATE ~~Four easy steps.~~is pleasant and easy to use

- ~~1.~~ Strap the sensor and belt over your clothes
- ~~2.~~ Turn on the device
- ~~3.~~ Breathe normally
- ~~4.~~ Listen and follow the musical tones that guide the breathing exercises.

The large keypad and display allow you to easily adjust volume, select melody and see exercise results.

Please read the enclosed training materials

***Item Two**: Similarly, the box cover in the same location has brief descriptions of What is RESPeRATE, How RESPeRATE Works, and Why RESPeRATE Works. These should also be consistent with language used in similar sections of the operator manual.*

Response Two: The box and the User's Manual have been revised to be consistent, except that the information contained on the box provides less detail than the User's Manual. The User's Manual introduction will be revised to include the following:

What is RESPeRATE

RESPeRATE is the only non-drug medical device clinically proven to lower blood pressure.

The **RESPeRATE** unit has three components: the **RESPeRATE** device, elastic belt with respiration sensor and comfortable headphones. **RESPeRATE** is portable, battery-operated and about the size of a home blood pressure monitor.

How Does it Work

RESPeRATE analyzes your breathing rate and pattern, then interactively guides you through breathing exercises that lower breathing rate, slowly and effortlessly, by prolonging exhalation. After each exercise, your breathing returns to ~~it's~~its normal rate and pattern; however the beneficial effects on blood pressure accumulate.

Why Does it Work

RESPeRATE's breathing exercises ~~beneficially alter both heart rate and tone of the~~reduce neural sympathetic activity and relax the muscles that surround your small

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blood vessels ~~in the human body~~. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure.

The back panel of the box will be revised to state the following:

What is RESPeRATE

RESPeRATE is the only non-drug medical device clinically proven to lower blood pressure. It provides a new option for lowering blood pressure, which may be used safely along with medication or other lifestyle modifications such as diet and exercise.

How Does it Work

RESPeRATE analyzes your breathing rate and pattern, then interactively guides you through ~~then creates customized musical tones to guide an individual~~ breathing exercises that reduce your ~~lower breathing that lower~~ breathing rate, slowly and effortlessly, by prolonging exhalation. After each exercise, your breathing returns to its normal rate and pattern ~~lower breathing that lower~~; however the beneficial effects on blood pressure accumulate.

Why Does it Work

RESPeRATE's breathing exercises ~~beneficially alter both heart rate and tone of the~~reduce neural sympathetic activity and relax the muscles that surround your small blood vessels ~~in the human body~~. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure.

Item Three: *In the Introduction paragraph we suggest that in the second paragraph, second line, the sentence should read "These breathing exercises may be enhanced by individualized coaching.*

Response Three: The third paragraph to the Introduction to the User's Manual on page 1 will be revised as follows:

Scientific evidence has shown that breathing exercises, when performed routinely, can lower blood pressure. These breathing exercises are ~~virtually impossible~~difficult to perform without continuous, individualized coaching. Using a patented technology, **RESPeRATE** provides this coaching in an extremely effective way.

Item Four: *We recommend that pages 2 and 3 be rewritten to include a brief discussion of the concept of lifestyle modifications and that there should be a better link between these pages and the Instructions for Use on page 17. It is felt that there should be some statement of specific indication for use being granted the device in this section so the user right off understands that use of the RESPeRATE is part of a total package of care designed to lower blood pressure and this includes modifications to lifestyle, maybe medication, and/or other changes.*

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Response Four: The Introduction contained on pages 1 and 2 will be revised to state the following:

Introduction

Congratulation! **RESPeRATE** To Lower Blood Pressure, will help you take an active step toward improved treatment of your high blood pressure. Please read this User's Manual carefully and completely. It includes everything you need to know to help you maximize the benefits of using **RESPeRATE** To Lower Blood Pressure.

Please note: **RESPeRATE** should only be used as part of your overall health program for achieving goal blood pressure, as recommended by your doctor. **RESPeRATE** can be safely used in conjunction with medication and lifestyle modification such as diet and exercise.

Scientific evidence has shown that breathing exercises, when performed routinely, can lower blood pressure. These breathing exercises are ~~virtually impossible~~difficult to perform without continuous, individualized coaching. Using a patented technology, **RESPeRATE** provides this coaching in an extremely effective way.

RESPeRATE guides you to slow down your rate of respiration while prolonging the exhalation. **RESPeRATE** will lead you to breath at a rate of 10 breaths per minute or less. We call this "Effective Exercise Time".

To achieve best results, it is recommended that you use **RESPeRATE** for at least 45 minutes of Effective Exercise Time per week -- preferably in 15 minute daily sessions. As with other exercises, you should expect to see notable results within approximately six to eight weeks.

What is optimal blood pressure?

Optimal blood pressure is 120/80 mmHg. High blood pressure puts you at increased risk for stroke, heart attack, and other life threatening disorders.

What is RESPeRATE

RESPeRATE is the only non-drug medical device clinically proven to lower blood pressure.

The **RESPeRATE** unit has three components: the **RESPeRATE** device, elastic belt with respiration sensor and comfortable headphones. **RESPeRATE** is portable, battery-operated and about the size of a home blood pressure monitor.

How Does it Work

RESPeRATE analyzes your breathing rate and pattern, then interactively guides you through breathing exercises that lower breathing rate, slowly and effortlessly, by prolonging exhalation. After each exercise, your breathing returns to ~~it's~~its normal rate and pattern; however the beneficial effects on blood pressure accumulate.

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Why Does it Work

RESPeRATE's breathing exercises ~~beneficially alter both heart rate and tone of the~~reduce neural sympathetic activity and relax the muscles that surround your small blood vessels ~~in the human body~~. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure.

Item Five: We believe the section under Why does **RESPeRATE** *Work should be deleted since there is not data supporting this discussion of toning muscles. It would be OK to include here a discussion similar to that contained in section 1.4 of the application in section 7 which discusses breathing exercises (pages 4 and 5 of Section 7).*

Response Five: The section entitled "Why Does it Work" on page 2 of the User's Manual has been revised to be more consistent with section 1.4 in plain language for the user as follows:

Why Does it Work

RESPeRATE's breathing exercises ~~beneficially alter both heart rate and tone of the~~reduce neural sympathetic activity and relax the muscles that surround your small blood vessels ~~in the human body~~. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure.

Item Six: Page 4 has information of correct placement of belt. Is this based on actual clinical trial data? Was this looked at as part of the original clinical study for the prescription clearance or is this based on experience subsequent to marketing?

Response Six: The instruction on the correct placement of belt was included in the original User's Manual used during the clinical trial and the resulting data was analyzed at table 3 on page 18 of the original 510(k) submission.

Item Seven: Page 15 Cleaning and Maintenance, the 4th bullet has temperature information for where the device can be placed. What is the basis for this recommendation, especially the lower temperature of – 14° F or 10° C?

Response Seven: The lower temperature range for storage of the device of -14°F or 10°C is based upon the storage specifications for the various components of the device – specifically, the LCD display.

Item Eight: I would suggest using K # on page 16 since this is the document granting OTC.

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Response Eight: As requested by FDA, page 16 will be revised to indicate that the country specific clearance in the United States is pursuant to 510(k) number K020399, as well as K000405.

Item Nine: *Page 17, Precautions, think this should be placed in a black box and this should also appear on the box itself as part of the caution that this device is intended to be used as part of a planned reduction in blood pressure.*

Response Nine: The top part of the precautions (the "please note") on page 17 of the User's Manual will be boxed in and the precautions appear in the following manner in the User's Manual:

> Please note: **RESPeRATE** should only be used as part of your overall health program for achieving goal blood pressure, as recommended by your doctor. **RESPeRATE** can be safely used in conjunction with medication and lifestyle modification such as diet and exercise.

Precautions

Do not use this device without consulting your physician if you suffer or have suffered in the past from: Active ischemic heart disease/unstable angina, severe congestive heart failure, chronic atrial fibrillation, stroke resulting in permanent ~~left with~~ impairment, chronic renal failure, severe asthma, chronic obstructive pulmonary disease (COPD) like chronic bronchitis and emphysema, or major organ failure.

InterCure strongly recommends that you do not modify your hypertension treatments without the advice and consent of your physician.

Do not use your **RESPeRATE** when you need to be alert or to concentrate, or when using heavy equipment. Do not use **RESPeRATE** while driving.

If you experience any side effects or if you feel any change in your general health or mood, immediately discontinue use of your **RESPeRATE**, and contact your physician.

Breathe naturally throughout the exercise. Excessive deep breathing may cause dizziness and palpitations.

On the product package, the prescription labeling will be replaced with the boxed note as follows:

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Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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> ~~Caution: Federal law restricts the RESPerATE device to sale by or on the oder of a physician~~
> Please note: **RESPeRATE** should only be used as part of your overall health program for achieving goal blood pressure, as recommended by your doctor. **RESPeRATE** can be safely used in conjunction with medication and lifestyle modification such as diet and exercise.

Item Ten: The section which has the Ten Steps to Lower Blood Pressure, we recommend that this read Ten Steps to Using RESPeRATE.

Response Ten: The card included in the User's Manual entitled *Getting Started Guide* includes a section on the back entitled T*en Steps to Lower Blood Pressure*, which will be retitled *Ten Steps to Using RESPeRATE.*

Item Eleven: Regarding the box, there is a place where data is presented on average reduction. Is this based on the clinical study supporting this 510(k) or is it from some other source? Also, it would be better to use figure 2 from page 27 of section 7 to show effects and make the statement that data is based on a 250 minute use over 8 weeks which is the real basis for this clearance.

Response Eleven: Specific information regarding clinical results will be modified as follows:

> Clinical trials have shown that RESPeRATE significantly reduces blood pressure without any side effects. For best results, use for 15 minutes at least three or four times per week. ~~Average reductions are:~~
>
> - ~~12/6 mmHg for all individuals~~
> - ~~15/9 for individuals with initial blood pressure greater than 140/90 mmHg~~
> - ~~17/11 mmHg for individuals 60 years of age or older~~

II. JUNE 11, 2002 REQUEST FOR ADDITIONAL INFORMATION

Item Twelve: (user manual general) I suggest the applicant add further explanation in simple terms as to how the device works.

Response Twelve: As explained in the Response to Item Two, the information under the headings "How Does It Work" and "Why Does it Work" have been revised to state "**How Does It Work** - RESP*e*RATE analyzes your breathing rate and pattern, then interactively guides you through breathing exercises that lower breathing rate, slowly and effortlessly, by prolonging exhalation. After each exercise, your breathing returns to its normal rate and pattern; however the beneficial effects

7

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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on blood pressure accumulate." and "**Why Does it Work** - -RESPeRATE's breathing exercises reduce neural sympathetic activity and relax the muscles that surround your small blood vessels. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure, respectively."

Item Thirteen: *(user manual page 2) Is the following description containing the claim and accurate one? The RESPeRATE "alters the tone of the muscles that surround your small blood vessels. As it occurs, blood flows more easily through blood vessels. As a result, blood pressure is lowered."?*

Response Thirteen: The description that using the RESPeRATE alters muscle tone surrounding small blood vessels is accurate and has been expanded to explain that the RESPeRATE reduces neural sympathetic activity and relaxes muscles that surround small blood vessels. In addition, as explained in the Response to Item Five, the information under the Heading, "Why Does it Work," has been revised to be consistent with the description in section 1.4 of the 510(k) submission.

Item Fourteen: *(user manual page 4) The picture on this page and the subsequent pages should be much larger. For illustrative purposes, a non-shaded and labeled drawing is preferred over a photograph. See Guidance Document, page 38, first paragraph.)*

Response Fourteen: The photographs provided on page 4 of the User's Manual provide clear images to accompany the narrative instructions. The instructions for using the device have been validated during an OTC trial and in marketing of the prescription device, in which the instructions are identical. During actual use, InterCure has received minimal questions to help desk, none of which were related to these specific instructions. Therefore, the instructions will not be modified.

Item Fifteen: *(user manual page 9) These is no explanation of why the patient would want to change the duration of the exercise session. Please explain.*

Response Fifteen: Patients may wish to modify the duration of an exercise session for reasons unrelated to their therapy (*e.g.*, time constraints). Thus, further information regarding reasons a patient may wish to modify the duration of an exercise session will not be provided. However, page 9 of the User's Manual will be revised to state:

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Changing the Duration of Your Current Exercise Session

If you would like to extend or shorten the duration of the current exercise session

1. **Press the Exercise time ...**

Changing the Duration of Your Default Exercise Session

If you would like to extend or shorten the duration of the default exercise session

Item Sixteen: *(user manual page 13-14) I'm unable to evaluate this table (report A, B and C) without actually using the device. I assume that this table represents item numbers that are user friendly when accessed. Please explain how the patient can use the information to benefit his or her physical status. Is the goal to experience 45 minutes of total "effective exercise time?" Is possible that the patient may use the device an hour or more to gain the required "effective exercise time?"*

Response Sixteen: The numbers presented in the tables on pages 13 and 14 are user friendly when accessed. The Item Numbers are displayed on the screen and each number corresponds to the information in the "Reports On" column.

Each exercise session is to consist of 15 minute sessions with a goal of accumulating at least 45 minutes of effective exercise time per week. The theme of "goal" is carried throughout the manual, as it has proven to be a very effective concept with consumers. Indeed, the OTC study demonstrated that blood pressure reduction is directly correlated with accumulated effective exercise time.

Item Seventeen: *(user manual page 16) Some information on this page is not appropriate for the patient. I recommend that the applicant delete the country specific market clearance and CE statement.*

Response Seventeen: As explained in the Response to Item Eight, page 16 has been revised to include the current K number for marketing clearances. In order to facilitate international labeling, the CE statement, Israeli Ministry of Health No. 408196 237-0000, and a mention of CE mark have been included on page 16. The CE statement on page 16 of the User's Manual will be revised to state:

Country Specific Market Clearance
United States: 510(k) number K020399, as well as K000405
Israel: Ministry of Health # 408/96 237-0000
European Union: CE marking

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Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

CE Statement
The RESPeRATE has a CE marking

Manufacturer Authorized Representative in Europe:
MEDES Ltd.
2 Upper Station Road, Radlett, Herts London WD78BX, UK
tel/fax: +44 (0) 1923859810
email: medes@arazygroup.com
~~**RESPeRATE** fulfills the provisions of the EC Directive 93/42/EEC (Medical Device Directive). **RESPeRATE** is designed according to the European standard EN 60601-1. **RESPeRATE** is classified according to clause 5 of the European standard EN 60601-1: Internally powered equipment; protection against electrical shock: type BF; protection against harmful ingress of water: ordinary; need only cleaning; resperate is not suitable for use in the presence of a flammable anaesthetic mixture with air, or with oxygen or nitrous oxide; operation: continuous.~~

Item Eighteen: *(user manual page 17) Please define or simplify the following words: Ischemic heart disease, unstable angina, chronic atrial fibrillation, Stroke/left with impairment, chronic renal failure. Please write out and define COPD*

Response Eighteen: As discussed with Mr. Felten on June 12, 2002, the conditions included in the precautions accurately describe common conditions using terminology that is routinely used in medicine. The User's Manual suggests that the user consult his or her physician if the patient suffers or has suffered from any of the listed conditions. Further clarification in the User's Manual may in fact create greater user confusion without participation by the patient's physician.

The term COPD will be spelled out and clarified. The paragraph will now read:

> Do not use this device without consulting your physician if you suffer or have suffered in the past from: Active ischemic heart disease/unstable angina, severe congestive heart failure, chronic atrial fibrillation, stroke resulting in permanent ~~left with~~ impairment, chronic renal failure, severe asthma, chronic obstructive pulmonary disease (COPD) like chronic bronchitis and emphysema, or major organ failure.

Item Nineteen: *(Getting started guide) This section appears to be abbreviated instruction for use. How will it be provided to the device user*

Response Nineteen: This "Getting Started Guide" will be provided to the user as a supplemental card to the full User's Manual. As indicated in the Response to Item Ten, the "Getting Started Guide" will be renamed to "Ten Steps to Using RESPeRATE."

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

Item Twenty: *(Packaging page 1?) Unable to read fonts on page 1. Suggest to use fonts larger then #12*

Response Twenty: All fonts, with the exception of the technical information, are 12 point font or larger.

Item Twenty-One: *(Packaging page 4?) This page contains the claim that "clinical trials have shown that RESPeRATE significantly reduces blood pressure." The average indications provided on this page may not be understandable to most average readers. I recommend that the applicant give examples of the expected final blood pressure readings for each of the three categories if reduced. For instance, give an example of elevated blood pressure and calculate the possible reduction of all patients; those with blood pressure 140/90, and patients over 60.*

- **Response Twenty-One:** As indicated in the Response to Item Eleven, the entire reference to specific reductions have been deleted from the box and is replaced with a general statement about significant blood pressure reduction, "Clinical trials have shown that RESPeRATE significantly reduces blood pressure without any side effects. For best results use for 15 minutes at least three or four times per week."

Item Twenty-Two: *(Packaging page 5?) RESPeRATE TO LOWER BLOOD PRESSURE. The short paragraph provided on this page is informative (e.g., optimal blood pressure reading) and could also be included in the text of the patient brochure.*

Response Twenty-Two: As indicated in the Response to Item Four the introduction of the User's Manual will include the text as follows:

> **What is optimal blood pressure?**
>
> Optimal blood pressure is 120/80 mmHg. High blood pressure puts you at increased risk for stroke, heart attack, and other life threatening disorders.

Item Twenty-Three: *(Packaging page 6?) some of the information on this page could be provided in the text of the patient brochure, for example, that the device is lightweight and portable.*

Response Twenty-Three: The relevant information from page 6 of the packaging, which adds to the consumer knowledge, has already been integrated throughout the user manual.

//

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Item Twenty- Four: *(Video tape on RESPeRATE) The video was easy to follow. There was one confusing part. The power on/of button is on the right. On page 4, the instructions say that the user can choose a different melody using this button on the right side of RESPeRATE. Is this the same button? It was unclear on the tape and in the script? Will the script be provided to the patient?*

*The last paragraph informs that this device is an added (adjunctive) treatment for high blood pressure, use should be directed by a doctor and is usually used with drugs and non-drug treatments to lower blood pressure. ....**This statement should be included in the patient brochure.***

Response Twenty-Four: The video script will not be provided to patients and was submitted to FDA facilitate the review process only. The last section of the video, which consists of written text that is read by a voice-over, "that this device is an added (adjunctive) treatment for high blood pressure, use should be directed by a doctor and is usually used with drugs and non-drug treatments to lower blood pressure," is only relevant for the prescription indication. The video will be revised to replace this section of the video with a text message of the following paragraph from the user manual with no voice-over:

> Please note: **RESPeRATE** should only be used as part of your overall health program for achieving goal blood pressure, as recommended by your doctor. **RESPeRATE** can be safely used in conjunction with medication and lifestyle modification such as diet and exercise.

LABELING CHANGES INITIATED BY INTERCURE

In addition to the revisions to the labeling suggested by FDA's requests for additional information, InterCure will make the following revisions to pages 4-5 and page 11 of the User's Manual, respectively.

(pages 4-5)

~~**4. Loosen any tight clothing to ensure you breath easily**~~

7. Plug in and put on the headphones.
Plug headphones into the RESPeRATE device headphone port located on the right side of device, marked with the (icon) icon. You should hear a click when the headphones are fully inserted into the port.

(page 11) [add to trouble shooting table]

Static noise heard through headphones	Headphones not fully plugged into RESPeRATE port	Plug headphones full into device.

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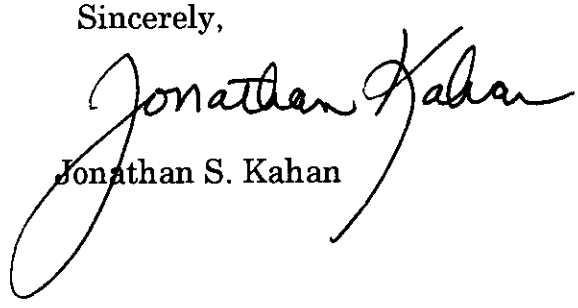
	Electronic communication device (such as cell phone, bi-directional beeper, or other wireless communication device) is operating within 5 feet of RESPeRATE	Do not use such communication device within 5 feet of RESPeRATE while conducting your exercise session

* * *

If you have any additional questions or concerns regarding this submission please contact me at the above number. Upon a finding of substantial equivalence please fax a copy of the notification letter to us at (202)-637-5910.

Sincerely,



Jonathan S. Kahan

Attachments

ccs: Paul Sheils, InterCure USA
Erez Gavish, InterCure Ltd.
Gerard J. Prud'homme, Esq.
Jodi K. Scott, Esq.
Joseph K. Canner, Regulatory Affairs Specialist

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

JUL - 2 2002

InterCure LTD.
c/o Jonathan S. Kahan
Hogan and Hartson, L.L.P.
555 13th Street, N.W.
Washington, D.C. 20004-1109

Re: K020399
Trade Name: RESPeRATE
Regulation Number: 882.5050
Regulation Name: Biofeedback device
Regulatory Class: II
Product Code: HCC
Dated: May 9, 2002
Received: May 9, 2002

Dear Mr. Kahan:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to 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 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); 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.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 21 CFR Part 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4659. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/dsma/dsmamain.html

Sincerely yours,

for Celia M. Witten, Ph.D., M.D.
Director
Division of General, Restorative
and Neurological Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

510(k) Number (if known): K020399

Device Name: **InterCure Ltd. RESPeRATE**

Indications for Use:

The RESPeRATE is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions.

(PLEASE DO NOT WRITE BELOW THIS LINE -- CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use ____ OR Over-The-Counter Use X

(Per 21 C.F.R. 801.109)
(*Optional Format 1-2-96*)

(Division Sign-Off)
Division of General, Restorative
and Neurological Devices

510(k) Number K020399

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

DEPARTMENT OF HEALTH AND HUMAN SERVICES Public Health Service

Food and Drug Administration
Center for Devices and
Radiological Health
Office of Device Evaluation
Document Mail Center (HFZ-401)
9200 Corporate Blvd.
Rockville, Maryland 20850

February 07, 2002

INTERCURE LTD.
C/O HOGAN AND HARTSON L.L.P.
555 13TH STREET N.W.
WASHINGTON, DC 20004
ATTN: JONATHAN S. KAHAN

510(k) Number: K020399
Received: 06-FEB-2002
Product: RESPERATE; MODEL RR-150

The Center for Devices and Radiological Health (CDRH), Office of Device Evaluation (ODE), has received the Premarket Notification you submitted in accordance with Section 510(k) of the Federal Food, Drug, and Cosmetic Act (Act) for the above referenced product. We have assigned your submission a unique 510(k) number that is cited above. Please refer prominently to this 510(k) number in any future correspondence that relates to this submission. We will notify you when the processing of your premarket notification has been completed or if any additional information is required. YOU MAY NOT PLACE THIS DEVICE INTO COMMERCIAL DISTRIBUTION UNTIL YOU RECEIVE A LETTER FROM FDA ALLOWING YOU TO DO SO.

As a reminder, we would like to mention that FDA requires all 510(k) submitters to provide an indications for use statement on a separate page. If you have not included this indications for use statement in addition to your 510(k) summary (807.92), or a 510(k) statement (807.93), and your Truthful and Accurate statement, please do so as soon as possible. If the above mentioned requirements have been submitted, please do not submit them again. There may be other regulations or requirements affecting your device such as Postmarket Surveillance (Section 522(a)(1) of the Act) and the Device Tracking regulation (21 CFR Part 821). Please contact the Division of Small Manufacturers, International and Consumer Assistance (DSMICA) at the telephone or web site below for more information.

Please remember that all correspondence concerning your submission MUST be sent to the Document Mail Center (DMC)(HFZ-401) at the above letterhead address. Correspondence sent to any address other than the DMC will not be considered as part of your official premarket notification submission. Because of equipment and personnel limitations, we cannot accept telefaxed material as part of your official premarket notification submission, unless specifically requested of you by an FDA official. Any telefaxed material must be followed by a hard copy to the DMC (HFZ-401).

You should be familiar with the manual entitled, "Premarket Notification 510(k) Regulatory Requirements for Medical Devices" available from DSMICA. If you have other procedural or policy questions, or want information on how to check on the status of your submission (after 90 days from the receipt date), please contact DSMICA at (301) 443-6597 or its toll-free number (800) 638-2041, or at their Internet address http://www.fda.gov/cdrh/dsmamain.html or me at (301) 594-1190.

Sincerely yours,

Marjorie Shulman
Consumer Safety Officer
Premarket Notification Staff
Office of Device Evaluation
Center for Devices and Radiological Health

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

K020399

HOGAN & HARTSON

L.L.P.

February 6, 2002

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910
WWW.HHLAW.COM

JONATHAN S. KAHAN
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JSKAHAN@HHLAW.COM

BY HAND DELIVERY

510(k) Document Mail Center (HFZ-401)
Center for Devices and Radiological Health
Food and Drug Administration
9200 Corporate Boulevard
Rockville, Maryland 20850

SK-51

Attention: Neurology Devices Branch

Re: Premarket Notification for InterCure Ltd.'s RESPeRATE Biofeedback Device

Dear Sir or Madam:

In accordance with Section 510(k) of the Federal Food, Drug, and Cosmetic Act ("FDC Act"), InterCure Ltd. ("InterCure"), by its counsel, Hogan & Hartson, LLP, is submitting the enclosed premarket notification ("510(k) notice") for its RESPeRATE biofeedback device ("RESPeRATE"). The information contained herein was provided by InterCure to Hogan & Hartson for submission to the Food and Drug Administration ("FDA"), and InterCure is solely responsible for the accuracy and completeness of this information.

The RESPeRATE is essentially the same device (except for a new name and OTC labeling) as the already cleared Respi-Low and is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions.

The RESPeRATE is a hand-held, battery operated device comprised of three principal components: (1) a respiratory muscle activity monitor (respiration sensor), (2) a computerized control unit, and (3) headphones to provide feedback to the user. The device achieves its effect by guiding the user to slow and modify his/her breathing pattern, applying the natural tendency of the human body to follow external rhythms. Breathing pattern modification occurs as the user voluntarily follows the sound pattern that is produced by the device in response to his/her breathing movements. This process reaches a steady state at the lowest breathing rate convenient to the user.

NE
II
54

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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The RESPeRATE is substantially equivalent to the InterCure's Respi-Low (K000405) which was cleared for prescription use. The RESPeRATE has substantially the same intended use in an over-the-counter (OTC) setting and the same indications for use, as well as essentially the same technological features as the already cleared Respi-Low. The change to the OTC setting, however, does not raise any new questions of safety and efficacy when compared to the predicate, as confirmed by the data included in this submission.

We trust that the information contained in the attached 510(k) notice will be sufficient to enable FDA to find that the RESPeRATE is substantially equivalent to the predicate. Please direct any questions or requests for information concerning this submission to me at the above listed telephone number. Upon reaching a finding of substantial equivalence, please forward a signed copy of the substantial equivalence letter to me by facsimile at (202) 637-5910.

Sincerely,

Jonathan S. Kahan

Enclosure

ccs: Dr. Benjamin Gavish, InterCure Ltd.
Erez Gavish, InterCure Ltd.
Gerard J. Prud'homme, Esq.

SDC - 677614 - #1474300v1
Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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InterCure Ltd.
RESPeRATE

510(k) PREMARKET NOTIFICATION CHECKLIST

ITEM		COMMENT
1.	Device trade or proprietary name	*See* 510(k) notice section 2 RESPeRATE
2.	Device common or usual name or classification name	*See* 510(k) notice section 2 Biofeedback Device
3.	Establishment registration number (only applies if establishment is registered)	*See* 510(k) notice section 3
4.	Class into which the device is classified	*See* 510(k) notice section 4 this is a class II device
5.	Classification Panel	*See* 510(k) notice section 4 Neurology Panel
6.	Action taken to comply with Section 514 of the Act	*See* 510(k) notice section 5 Not applicable - no performance standards developed and no applicable special controls
7.	Proposed labels, labeling and advertisements (if available) that describe the device, its intended use, and directions for use	*See* Attachment 1
8.	A 510(k) summary of safety and effectiveness or a 510(k) statement that safety and effectiveness information will be made available to any person upon request	*See* Attachment 9

WDC - 677601/1 - #1474300v1
Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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9.	For class III devices only, a class III certification and a class III summary	Not applicable – this is a class II device
10.	Engineering drawing of the device	*See* Attachment 5
11.	The marketed device(s) to which equivalence is claimed including labeling and description of the device	*See* 510(k) notice section 7; Attachment 3
12.	Statement of similarities and/or differences with marketed devices(s)	*See* 510(k) notice section 7
13.	Data to show consequences and effects of a modified device	Not applicable
14.	Submitter's name and address	*See* Attachment 13
15.	Contact person, telephone number and fax number	*See* Attachment 14
16.	Representative/Consultant if applicable	Jonathan S. Kahan, Esq., Hogan & Hartson L.L.P.
17.	Table of Contents with pagination	*See* 510(k) notice page i
18.	Address of manufacturing facility/facilities and, if appropriate, sterilization site(s)	*See* 510(k) notice section 3
19.	Comparison table of the new device to the marketed device(s)	*See* Attachment 2
20.	Action taken to comply with voluntary standards	See Section 7.4, IEC 60601-1-1 and IEC 60601-1-2
21.	Performance data	
	a. marketed device	

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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1. bench testing	Not applicable
2. animal testing	Not applicable
3. clinical data	Not applicable
b. new device	
1. bench testing	Not applicable
2. animal testing	Not applicable
3. clinical data	*See* 510(k) notice sections 8; Attachment 7
22. Sterilization information	Not applicable
23. Software Information	*See* Attachment 6
24. Hardware information	Not applicable
25. Is this device subject to issues that have been addressed in specific guidance document(s)?	Yes; Biofeedback Devices Draft Guidance for 510(k) Content
26. Other (specify)	---

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

510(k) Premarket Notification for the InterCure Ltd. RESPeRATE Biofeedback Device

InterCure Ltd.
9 Hamelacha st. Kislev building
Northern Industrial Area, Lod 71520
Israel

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENTS

	Number
Proposed Labeling and Instruction Manual -Operator's manual -Device packaging -Help desk information	1
Substantial Equivalence Comparison Chart	2
Predicate Device Labeling	3
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Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

1. INTRODUCTION

In accordance with Section 510(k) of the Federal Food, Drug, and Cosmetic Act ("FDC Act"), InterCure Ltd. ("InterCure") hereby submits this premarket ("510(k") notification for its RESPeRATE biofeedback device ("RESPeRATE") for OTC clearance. The RESPeRATE is classified as a class II medical device pursuant to 21 C.F.R. § 882.5050.

The RESPeRATE is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions. As explained in greater detail below, the RESPeRATE Model RR-150 is substantially similar to the company's previously cleared biofeedback device, InterCure's Respi-Low Model RL-108 (K000405), with respect to its indications for use, technological characteristics and principal of operation. The principal purpose of this submission is to expand the indications for use of the previously cleared Respi-Low to permit over the counter (OTC) use.

The RESPeRATE is a hand-held, battery operated device comprised of three principal components: (1) respiration sensor, (2) a computerized control unit, and (3) headphones to provide feedback to the user. In order to reduce high blood pressure, the RESPeRATE guides the user to slow and modify his/her breathing pattern using the natural tendency of the human body to follow external rhythms.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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The breathing pattern modification occurs as the user voluntarily follows the sound pattern with his/her breathing movements. The device is fully interactive, as the musical pattern is designed in response to the user's last five breaths. Thus, the pattern is gradually modified to attempt to extend expiration and slow the breathing rate. If the user's breathing pattern does not slow to match the music, the device returns to the user's previous breathing pattern/rate, and again begins to gradually modify the pattern to pull the user's breathing down to the desired rate. This process reaches a steady state at the lowest breathing rate convenient to the user. A more detailed description of the principles of operation of the device is provided in Section VII below. Additional information is also included in the Instruction Manual (**Attachment 1**).

As noted above, the RESPeRATE has substantially similar indications for use and technological characteristics to the Respi-Low, except that it is indicated for use in an OTC setting (Clinical testing was conducted to verify that subjects can appropriately use the device in an OTC setting, without the direction of a physician). Neither this change nor the technological characteristics of the RESPeRATE raise any new questions of safety and efficacy when compared to the predicate, as confirmed by the clinical data. Therefore, the device is substantially equivalent.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

2. NAME OF DEVICE

Common or usual name:	Biofeedback device
Proprietary Name:	RESPeRATE
Model:	RR-150
Classification Name:	Biofeedback device

3. ESTABLISHMENT REGISTRATION NUMBER AND ADDRESS OF MANUFACTURING FACILITY

InterCure's registration number with the FDA is 9617281; and its owner/operator number is 9040359. The address of the manufacturing facility is:

InterCure Ltd.
9 Hamelacha st. Kislev building
Northern Industrial Area, Lod 71520
Israel

4. DEVICE CLASSIFICATION/CLASSIFICATION PANEL

FDA has classified biofeedback devices as class II devices pursuant to 21 C.F.R. § 882.5050. Biofeedback devices are reviewed by the Neurology Devices Panel.

5. PERFORMANCE STANDARDS

FDA has not established performance standards for biofeedback devices under Section 514 of the FDC Act. No special controls apply.

6. PROPOSED LABELS AND LABELING

Proposed labeling for the RESPeRATE is provided in **Attachment 1**.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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7. SUBSTANTIAL EQUIVALENCE

As noted above, the RESPeRATE is substantially equivalent to InterCure's own previously cleared Respi-Low (K000405).

Specifically, the RESPeRATE has a similar intended use and indications for use to the predicate, as well as similar principles of operation and technological characteristics. Although there is a difference in the specific indications for use of the RESPeRATE compared to the predicate(i.e; prescription versus OTC use), this difference does not alter the therapeutic effect of the device or raise any new questions of safety or efficacy. A chart comparing the key features of the RESPeRATE and the predicate are summarized in **Attachment 2**. Labeling and/or promotional materials for the predicate Respi-Low is provided in **Attachment 3**.

7.1 Intended Use/Indications for Use

As stated above, the RESPeRATE is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions. This is the same as the indication for use of the predicate Respi-Low device, except that the previously cleared device was limited to physician-directed use, while the indications of the RESPeRATE permit OTC use. The change in the indications for use to eliminate "direction of a

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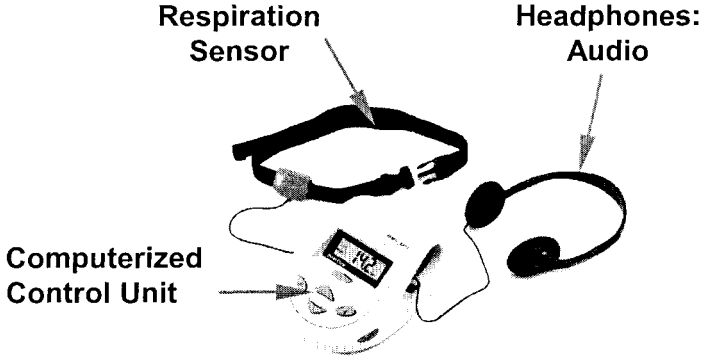
physician" is supported by the attached clinical data, which was gathered using the device in an OTC setting.

7.2 Principles of Operation/Technical Characteristics



The RESPeRATE is a hand-held, battery operated device containing a respiratory muscle activity monitor (respiration sensor), a computerized control unit, and headphones to provide feedback to the user. Diagrams of the device are provided in the figure above and in **Attachment 5.** In order to reduce high blood pressure, the RESPeRATE guides the user to slow and modify his/her breathing pattern using the natural tendency of the human body to follow external rhythms. The breathing pattern modification occurs as the user voluntarily follows the sound pattern with his/her breathing movements. The device is fully interactive, as the musical pattern is designed in response to the user's last five breaths. Thus, the pattern is gradually modified to attempt to extend expiration and slow the breathing rate. If the user's breathing does not slow to match the music, the device returns to the user's previous breathing pattern/rate, and again begins to gradually

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modify the pattern to pull the user's breathing down to the desired rate. This process reaches a steady state at the lowest breathing rate convenient to the user.

7.3 Comparison of the Principles of Operation/Technological Characteristics of the RESPeRATE with Previously Cleared Respi-Low Biofeedback Device

The principles of operation of the RESPeRATE, as outlined above, are identical to the principles of operation of the predicate device. Users of the RESPeRATE and the Respi-Low operate these devices in an identical manner.

The RESPeRATE and the Respi-Low biofeedback device are basically identical, they have the same general intended use: relaxation treatment (*i.e.*, reduction of stress). The RESPeRATE also has the same indications for use to the predicate with the exception of expanding its indications to permit OTC use. This expansion of the indications for use of the device does not raise new questions of safety or efficacy and does not alter its therapeutic effect, as fully supported by the clinical study data which shows that the device can be operated safely and effectivvely without the direction of a physician.

In addition, the RESPeRATE has substantially similar principles of operation and technological characteristics to the predicate. The device utilizes direct measurements to gauge the user's breathing, and the device provides auditory and visual feedback to the user based on these inputs. Although the RESPeRATE has some minor differences in the technological characteristics compared to the predicate, these minor differences do not raise any new issues of

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safety or efficacy, as confirmed by clinical testing. The minor technical changes in the device compared to the predicate device are explained below.

The only change to the breathing sensor is that the former technology was based on strain gauge that converts force into resistance changes with Analog to Digital converter, while the new technology is based on a capacitance sensor belt that converts force to frequency changes converted to digital signal. This change was found more appropriate for mass production. The sensor was tested in all temperature range of 0-70° C and moisture conditions. The sensor dynamic behaviour (sensitivity) was tested for functionality under stress. The sensor was found sensitive enough to monitor even shallow breathing movements in and somewhat beyond the range between too loose belt (hardly felt) and too tight belt (uncomfortable), displayed as warnings by the LCD. It was also found that the sensor response to temperature and moist is a drift of up to 500 over a typical value of 15000 (~3%), which does not affect performance since the sensor output relevant for the device are changes in the belt stress.

With respect to the computerized control unit the RESPeRATE has a communication port to PC available for download, while the Respi-Low has a disabled communication port. This change was made to enable data analysis and detailed user feedback.

During the recognition phase of the breathing exercise in the predicate device, 7 breaths were detected and the same music sound was used as in the

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interactive phase, while in the RESPeRATE there is 5 breath detection by a sophisticated algorithm and distinct tones are used that are different from the interactive phase music. This change was made to shorten the recognition phase and improve human interface.

The RESPeRATE RR-150 software, like that of the Respi-Low, presents a minor level of concern. InterCure has conducted verification and validation testing on the RESPeRATE RR-150, which contains version 2.09 of the software. A summary of the test results is provided in **Attachment 6**. The device passed the verification and validation testing.

Therefore, the RESPeRATE is substantially equivalent to the predicate device.

7.4 Safety compliance

The RESPeRATE RR-150 complies with the following voluntary standards:

> IEC 60601-1-1: 1988 plus amendment 1 (1991) and amendment 2 (1995) "Medical Electrical Equipment-Part 1: General Requirements for Safety"; and
>
> IEC 60601-1-2: 1993 "Medical Electrical Equipment-Part 1: General Requirements for Safety; Electromagnetic Compatibility—Requirements and Tests", Clause 36.201 "Radiated Emissions", Clause 36.202.1 "Electrostatic Discharge", and Clause 26.202.2 "Radiated radio-frequency electromagnetic fields."

The test reports showing compliance with these standards are provided in **Attachment 4**.

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8. SYNOPSIS OF THE OTC CLINICAL STUDY

A synopsis of the OTC clinical trial follows and a complete study report is provided in **Attachment 7**.

8.1 Background

Previous studies have demonstrated that routine breathing exercises guided by the predicate device (Respi-Low, cleared for prescription use, manufactured by InterCure, Ltd.) can lower high blood pressure (BP) safely and efficaciously. The RESPeRATE device for OTC use is nearly identical to the Respi-Low device having the same principles of operation with only minor technological differences. The RESPeRATE device was tested clinically in an OTC setting and the results of that study are presented here.

8.2 Objectives of OTC Trial

To evaluate the RESPeRATE (RR) device for the same intended use as the Respi-Low device but for OTC use. Safety and efficacy of the RR in reducing office BP was previously assessed in the Rx configuration. The proposed OTC use raises two questions: (1) Can patients operate RR appropriately with the available Instructions For Use, without physician training?, and (2) Does the use of RR under OTC conditions still reduce office BP?

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8.3 Methods

A clinical study was conducted to evaluate the following hypothesis:

(b)(4)

[redacted]

(b)(4)

[redacted]

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8.4 Results

The RR was appropriately used by patients in this study in the OTC setting. Nearly all (95%) patients who used the device at least once demonstrated the ability to achieve SB. BP reduction was correlated with the Total Time of Slow Breathing (TTSB) accumulated during the 8 weeks treatment period. SBP reduction in a subgroup of 32 "high users" of (b)(4) [redacted]), was significantly greater than in the subgroup of 34 "low users" of RR (b)(4) [redacted]) (b)(4) [redacted] These results are similar to the outcomes of the previous studies of the predicate device (Respi-Low) under prescription use.

8.5 Conclusions

Hypertensives are able to use the RESPeRATE device appropriately in an OTC setting. The routine use of the RESPeRATE lowers high BP safely and efficaciously without side effects.

9. FINANCIAL DISCLOSURES

The requisite financial disclosure forms for clinical investigators are included in **Attachment 8.**

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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10. 510(K) SUMMARY

A 510(k) summary for the RESPeRATE RR-150 is included in **Attachment 9**.

11. TRUTHFUL AND ACCURACY STATEMENT

The company's signed Truthful and Accurate statement is included in **Attachment 10.**

12. INDICATIONS FOR USE STATEMENT

The company's indications for use statement is included in **Attachment 11.**

13. CONFIDENTIALITY

The Confidentiality statement is included in **Attachment 12.**

14. SUBMITTER'S NAME AND ADDRESS

The Submitter's name and address is included in **Attachment 13.**

15. CONTACT PERSON'S TELEPHONE AND FACSIMILE NUMBERS

The Contact person's telephone and facsimile numers are included in **Attachment 14.**

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENT 1

Proposed Labeling and Instruction Manual

-Operator's manual

-Device packaging

-Help desk information

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Interactive Therapeutic Devices

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RESP@RATE
TO LOWER BLOOD PRESSURE

User Manual

Your complete resource for getting the most out of
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RESPeRATE™
TO LOWER
BLOOD PRESSURE

Welcome:

RESPeRATE TO

LOWER BLOOD PRESSURE

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Contacts

U.S. customers can contact us at:

Web: www.resperate.com
E-mail: support@resperate.com
Telephone: 877·988·9388

For other country specific telephone numbers, please refer to our corporate web site, at www.intercure.com

Manufactured by InterCure Ltd., Lod, Israel

Copyright © 2001 InterCure, Inc. All rights reserved. Resperate, Resperate for Lower Blood Pressure, and InterCure are trademarks of InterCure.

Caution: Federal law restricts the RESPeRATE device to sale by or on the order of a physician.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Introduction

Congratulations! **RESPeRATE TO LOWER BLOOD PRESSURE**, will help you take an active step toward improved treatment of your high blood pressure. Please read this *User Manual* carefully and completely. It includes everything you need to know to help you to maximize the benefits of using **RESPeRATE TO LOWER BLOOD PRESSURE.**

Scientific evidence has shown that breathing exercises, when performed routinely, can lower blood pressure. These exercises are virtually impossible without continuous, individualized coaching. Using a patented technology, **RESPeRATE** provides this coaching in an extremely effective way.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

RESPeRATE guides you to slow down your rate of respiration while prolonging the exhalation. RESPeRATE will lead you to breath at a rate of 10 breaths per minutes or less. We call this "Effective Exercise Time".

To achieve best results, it is recommended that you use RESPeRATE for at least 45 minutes of Effective Exercise Time per week, preferably in 15 minute daily sessions. As with other exercises, you should expect to see notable results within approximately six to eight weeks.

What is RESPeRATE

The RESPeRATE unit has three components: the RESPeRATE device, elastic belt with a respiration sensor, and comfortable headphones. RESPeRATE is portable, battery-operated and, about the size of a home blood pressure monitor.

How Does it Work

RESPeRATE analyzes your breathing rate and pattern, then interactively guides you through breathing exercises that lowers breathing rate, slowly and effortlessly, by prolonging exhalation. After each exercise, your breathing returns to it's normal rate and pattern; however the beneficial effects on blood pressure accumulate.

Why Does RESPeRATE WORK

Use of RESPeRATE alters the tone of the muscles that surround your small blood vessels. As this occurs blood flows more easily through blood vessels. As a result, blood pressure is lowered.

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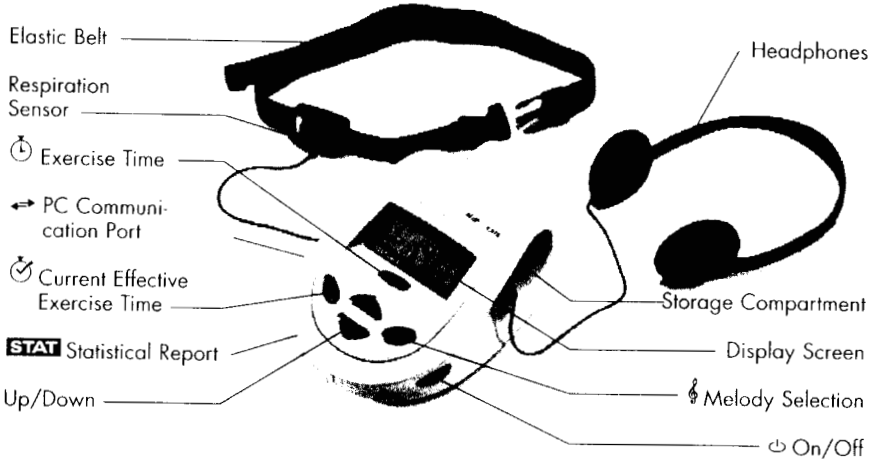
Exploring Your New RESPeRATE Device



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Preparing To Use RESPeRATE

1. **Install the batteries.**
   When using RESPeRATE for the first time, install 4 AA batteries in the battery compartment in the back of the device. Position the batteries as shown inside the compartment.

2. **Carefully remove the headphones and the sensor.**
   - *The sensor cable already is connected to the RESPeRATE device. Pull the cable with care.*
   - *Return the sensor to its compartment at the end of the each session.*
3. **Sit in a comfortable chair.**
4. **Loosen any tight clothing to ensure you breath easily.**
5. **Put on the elastic belt.**
   a) Buckle the elastic belt (over your clothing) around your upper abdomen or chest.

   b) Adjust the belt to fit snugly while you are in a sitting position. Be sure it is neither too tight nor too loose.

Notes:

Male

Female

- *Men tend toward abdominal breathing, while women tend toward thoracic (chest) breathing.*
- *Be sure the elastic belt is positioned horizontally, not diagonally, across your upper abdomen or chest.*

6. **Position the respiration sensor.**
   Slide the sensor along the belt, to ensure it can move freely. Position the sensor in the center of the abdomen (for abdominal breathing) or on the right side of the chest (for chest breathing).

7. **Plug in and put on the headphones.**
   Plug headphones into the RESPeRATE device headphone port located on the right side of device, marked with the ( ) icon.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Performing the Breathing Exercises

1. Press the (⏻) ON/OFF button.

At first, RESPeRATE displays your accumulated Effective Exercise Time from the past seven days.

Note: *You achieve Effective Exercise Time when you breathe slowly at 10 breaths or less per minute. It is recommended that you accumulate a total of at least 45 minutes of Effective Exercise Time in a seven day interval to get maximum benefit.*

2. Breathe normally.

You do not need to breathe especially deeply or slowly at the start of the exercise. Simply allow RESPeRATE to "recognize" your personal breathing pattern. This is called the Recognition Phase. During the Recognition Phase, each well-analyzed breath is displayed as a vertical line. You hear short musical tones during this process. These tones indicate that the Recognition Phase is in progress.

A flashing dot on the display accompanies your breathing and appears each time you inhale.

Once RESPeRATE has recognized four stable breaths (signified by the display of four vertical bars, as shown above), the device will display your current number of breaths per minute (e.g. 17.8 bpm). The exercise session will now begin, signified by the start of the melody.

Note:

- *If the Recognition Phase lasts longer than two minutes, please refer to the "Troubleshooting" section of this manual, starting on page 10.*

3. Breathe according to the Melody.

You will now start your Exercise Session. Your current breathing rate will be displayed as the number of breaths per minute (bpm).

RESPeRATE now composes a melody according to your individual breathing. The melody is composed of two distinct tones - which will coach you to inhale and the second (longer) tone to exhale. By gradually prolonging the exhalation tone, the melody slows down and interactively guides you towards a slower and more stable breathing pattern.

- Use the Inhale and Exhale arrows on the display as a guide for synchronizing your breathing with the melody.

- The arrows disappear after one minute of melody. At this point, close your eyes, relax and follow the melody with your breathing.

The exercise continues as long as you breathe according to the melody. Whenever you feel that the melody is too slow or too fast, or if you are uncomfortable, simply breathe normally and comfortably. Within 30 seconds, RESPeRATE automatically adjusts the melody to your breathing and begins again to guide you toward slower breathing.

Just before the session ends, RESPeRATE gradually decreases the volume of the melody. RESPeRATE automatically shuts down when the end of the Exercise Session is reached. The default duration of the Exercise Session is 15 minutes. In order to change this default, please refer to "Changing the Duration of your Default Exercise Session" on page 9.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Personalizing the Device

Adjusting the Volume

1. Press the UP or DOWN button (▲▼).
The volume (◢) icon is displayed, along with the current volume level.

2. Press the UP or DOWN button (▲▼) again, until you reach the volume you prefer.
After a few seconds, RESPeRATE automatically returns to the previous display.

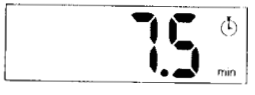
Selecting the Melody

Press the MELODY SELECTION (𝄞) button then immediately press the Up or Down button to scroll between melodies.

The (𝄞) icon is displayed, along with the selected melody number. For your convenience, RESPeRATE stores your last selected melody, and uses it the next time you begin your Exercise Session.

Viewing the Effective Exercise Time of the Current Session

The Effective Exercise Time of your current session is the number of minutes in which your breathing has been slower than 10 breaths per minute. Press the **CURRENT EFFECTIVE EXERCISE TIME** (⏱) button to view the Effective Exercise Time completed in the current session.



The (⏱) icon is displayed, along with the accumulated Effective Exercise Time for the current session.

Exercise Time

RESPeRATE automatically switches off at the end of the defined time for your exercise session. By default, the time is set at 15 minutes.

Changing the Duration of Your Current Exercise Session

1. Press the EXERCISE TIME (⏱) button.

2. Then immediately press the Up or Down button to change the exercise time.
When the (⏱) icon is pressed and displayed the remaining time of the present Exercise Session is shown. After a few seconds, RESPeRATE automatically returns to the previous display.

Changing the Duration of Your Default Exercise Session

1. Hold down the EXERCISE TIME(⏱) button until the display blinks.
The (⏱) icon is displayed, along with the current Exercise Session Time Default.

2. Use the UP or DOWN button to change the Exercise Session Time Default.

3. Press the EXERCISE TIME button again, in order to save the new Exercise Session Time Default.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Errors and Troubleshooting

The display screen of the RESPeRATE device will notify you if there are any problems with the device or if the exercises are not being performed as directed. Use the chart to understand the most common issues and tips to easily handle them.

Icon	Meaning	Action
	Sensor belt is too tight.	Loosen the belt. The icon disappears when the belt is properly positioned.
	Sensor belt is too loose.	Tighten the belt. The icon disappears when the belt is properly positioned.
	The elastic belt is improperly positioned. The sensor is improperly positioned.	Reposition the elastic belt, according to the instructions.
	Breathing is not synchronized with the melody.	Try to breath with the melody or select a different melody that might be easier to follow.
30.0	You are taking more than 30 breaths per minute.	Try to breathe more slowly.
	Batteries are weak.	Replace the batteries.

Troubleshooting

Problem	Meaning	Action
The display does not light when the device is switched on.	Batteries need to be replaced. The +/- poles of the batteries are positioned incorrectly.	Install new batteries. Re-install the batteries with the +/- poles positioned correctly
Music is not playing through the headphones.	The headphones are not properly connected. RESPeRATE has automatically switched off because the session is over.	Reconnect the headphones. Restart RESPeRATE.
The Recognition stage takes longer than two minutes.	The sensor is improperly positioned. Breathing is unstable.	Reposition the sensor. Relax, and breathe normally.

Customer Support

If you are still having trouble using the RESPeRATE device, call Customer Support at 1-877-988-9388. (U.S. Only)

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Assessing Your Overall Performance

The RESPeRATE device can measure your overall use of the device.

Did you meet your Effective Exercise Time Goal?

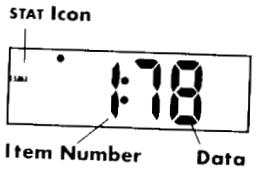
The quickest way to asses your performance is to ensure that every time you turn on the device, the Weekly Cumulative Effective Exercise Time (which is displayed on the screen whenever the device is turned on) is 45 minutes or greater. When 45 is indicated, it means that you are using the device in the prescribed manner, and, therefore are most likely to get maximum benefit from the exercises.

Don't forget: Your goal is to accumulate 45 minutes of Effective Exercise Time per week in order to see reductions in your blood pressure!

Advanced Analysis of Performance - (Statistical Report)

The "Statistical Report" function enables you to assess your performance during earlier RESPeRATE sessions. The report displays three groups of parameters that provide data on:

A. All Sessions,
B. The Last 10 Sessions, and
C. The Last Session Only.



To view this information:

1. **Turn on the RESPeRATE device.**
2. **During the Recognition Phase, press the STAT button on the left side of the RESPeRATE device.**

The STAT icon is displayed, along with the first statistical item, as shown in the figure above. Scroll through the different items using the UP or DOWN button.

Key to Statistical Report Items

A. Statistical Report of All Sessions

Item Number	Reports On
1	The number uses that have reached the Exercise Session. *(e.g. Display reads 1:78 that means 78 uses of the device have reached the Exercise Session).*
2	The number of uses not proceeding on to the Exercise Session. *(e.g. Display reads 2:07 that means 7 uses of the device did not proceed on to the Exercise Session).*
3	The average duration of the Exercise Session, in minutes.

B. Statistical Report of the Last 10 Sessions

Item Number	Reports On
4	The average duration of the Recognition Phase, in minutes.
5	The average duration of the Exercise Session, in minutes.
6	The average duration of the Effective Exercise Time, in minutes.
7	The average percentage of breaths synchronized with the melody.
8	The number of successful sessions.
9	The number of sessions that were unsuccessful because Effective Exercise Time lasted less than five minutes.
10	The number of sessions that were unsuccessful because of the low quality of the respiration data.
11	The number of sessions that were unsuccessful because breathing was not synchronized with the melody.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118.

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C. Statistical Report of the Last Session Only

Item Number	Reports On
12	The duration of the Recognition Phase, in minutes
13	The duration of the Exercise Session, in minutes.
14	The duration of Effective Exercise Time, in minutes.
15	Your initial breathing rate, in breaths per minute (bpm).
16	Your final breathing rate, in (bpm).
17	Percentage of respiration data that is of good quality.
18	Percentage of breaths synchronized with the melody.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Cleaning and Maintenance

- To clean RESPeRATE, use a soft, damp cloth. Do not wash the sensor or the RESPeRATE device. Do not use petroleum products, thinners, or cleaning solvents!
- Store the sensor in its compartment, to protect it from dust and moisture.
- Protect your RESPeRATE against excessive vibrations.
- Do not leave your RESPeRATE in a place where temperatures are below -14°F (-10°C) or above 158°F (70°C), or in conditions of very high humidity (+85%).
- Do not attempt to make repairs of any kind on RESPeRATE. Contact Customer Service at 1-877-988-9388, if repairs are necessary.
- To increase the lifetime of the batteries, remove them from the battery compartment if you do not plan to use the RESPeRATE for a period of more than two months.

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Technical Information and Approvals

Technical Information

Model: RESPeRATE RR-150; display type: LCD; power source: four alkaline batteries, 1.5v (type AA); battery life: two months, with regular use of 15 minutes per day; maximum audio output: 1.5mW RMS @ 32x2; respiration rate range display: 2 - 30 BPM; operating temperature: 10ºC - 40ºC (50ºF - 104ºF); operation humidity: 30 - 75%; storage temperature: -10ºC - 70ºC (14ºF - 158ºF); storage humidity: 30 - 85%; weight: 480grams; outer dimensions: approximately 17cm(L) x 13cm(W) x 8cm(H).

Country Specific Market Clearance

United States 510(k) Number; K000405
Israeli Ministry of Health No. 408/96 237-0000.

CE Statement

RESPeRATE fulfills the provisions of the EC Directive 93/42/EEC (Medical Device Directive). RESPeRATE is designed according to the European standard EN 60601-1. RESPeRATE is classified according to clause 5 of the European standard EN 60601-1:

Internally powered equipment; protection against electrical shock: type BF; protection against harmful ingress of water: ordinary; need only cleaning; resperate is not suitable for use in the presence of a flammable anaesthetic mixture with air, or with oxygen or nitrous oxide; operation: continuous.

Indication for Use (for United States)

Device Name: InterCure Ltd., RESPeRATE

Indications for Use

The device is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions.

Contraindications

none

Warning

None

Precautions

Do not modify or stop any other treatments for high blood pressure without consulting your physician.

Do not use RESPeRATE™ when you need to be alert, or to concentrate, while driving or when using heavy equipment.

Stop the breathing exercise, in case of temporary dizziness. Breathing too deeply might temporarily cause a dizziness sensation.

Do not use this device without consulting your physician if you suffer or have suffered in the past from: Active ischemic heart disease /unstable angina, severe congestive heart failure, chronic atrial fibrillation, stroke/left with impairment, chronic renal failure, severe asthma, COPD, or major organ failure.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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RESPeRATE
TO LOWER
BLOOD PRESSURE

Getting Started Guide

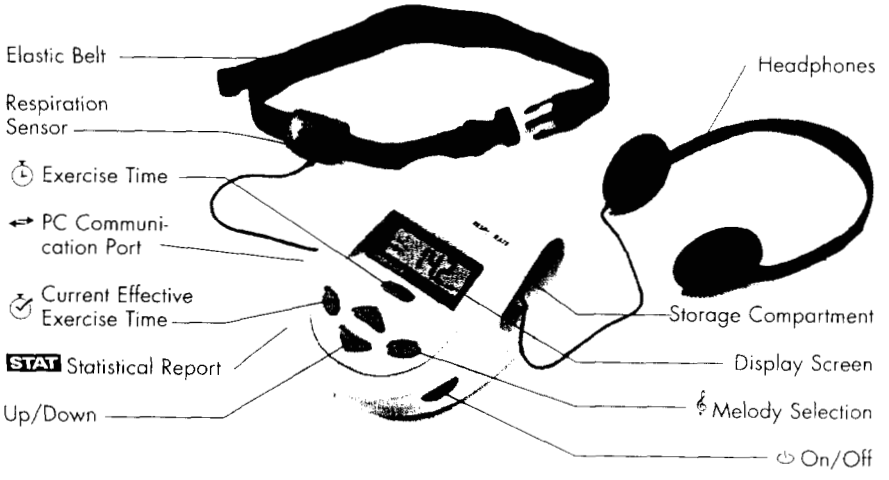
What is RESPeRATE all about?

Scientific evidence shows that routine breathing exercises can lower blood pressure. **RESPeRATE** provides individualized coaching to help you perform these breathing exercises. To achieve best results, it is recommended that you use **RESPeRATE** for at least 45 minutes of Effective Exercise Time per week, preferably in 15 minute daily sessions.

Note:

1. "Effective Exercise" is when you breathe slower than 10 breaths per minute.
2. You should expect to see notable results within approximately six to eight weeks.

Exploring Your RESPeRATE Device



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Ten Steps to Lower Blood Pressure

Full details to operate RESPeRATE and to perform the breathing exercises can be found in the User Manual.

Prepare

1. **Install the batteries in your RESPeRATE device.**
2. **Remove the headphones and the sensor from the storage compartment.**
3. **Sit in a comfortable chair; loosen tight clothing.**
4. **Put on elastic belt.**

Place it around your upper abdomen or chest (over your clothing).

5. **Position the sensor on your body.**

Place it on the center of the abdomen (men) or right side of the chest (women).

6. **Plug the headphones into the device and place the headphones on.**

Perform the Breathing Exercises

7. **Press the ON/OFF (⏻) button.**
8. **Breath normally.**

At first, **RESPeRATE** recognizes your individual breathing pattern. Each well - analyzed breath will be represented with a vertical line on the display screen and a short musical tone.

9. **Breath according to the melody.**

Next, **RESPeRATE** composes a melody according to your individual breathing. The melody is composed of two distinct tones - one representing an inhalation and one representing an exhalation. By gradually prolonging the exhalation tone, the melody slows down and interactively guides you towards a slower and more stable breathing pattern. Use the Inhale and Exhale arrows on the display as a guide for synchronizing your breathing with the melody.

Check Your Progress

10. **Push the Current Effective Exercise Time button (⏱)** to check how many minutes of Effective Exercise Time you have accumulated in the current session.

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RESP@RATE
TO LOWER
BLOOD PRESSURE

Lower your blood pressure... with no side-effects

Scientific evidence shows

RESP@RATE
TO LOWER
BLOOD PRESSURE

Non-Drug
Adjunctive Treatment
To Lower Blood Pressure

Clinical trials have shown
the RESPeRATE system reduce blood pressure

Lower your blood pressure... with no side-effects

RESP@RATE
TO LOWER
BLOOD PRESSURE

What is RESPeRATE

How RESPeRATE Works

Why RESPeRATE Works

RESPeRATE is...

What is your blood pressure?

Lower your blood pressure... with no side effects

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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RESPeRATE

TO LOWER BLOOD PRESSURE

Scientific evidence shows

that breathing exercises, when performed routinely, can lower blood pressure. These breathing exercises are virtually impossible to perform without continuous, individualized coaching. Let **RESPeRATE** be your personal coach.

Lower your blood pressure... with no side-effects

RESPeRATE

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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RESP@RATE™

TO LOWER BLOOD PRESSURE

Non-Drug Adjunctive Treatment To Lower Blood Pressure

- No side-effects
- Doctor recommended
- Clinically proven

Lower your blood pressure... with no side-effects

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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RESPeRATE™

TO LOWER BLOOD PRESSURE

Clinical trials have shown
that **RESPeRATE** significantly reduces blood pressure.

Average reductions are:

- 12/6 mmHg for all individuals
- 15/9 mmHg for individuals with initial blood pressure greater than 140/90 mmHg
- 17/11 mmHg for individuals 60 years of age or older

Lower your blood pressure... with no side-effects

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RESPeRATE

TO LOWER BLOOD PRESSURE

What is your blood pressure?

Optimal blood pressure is 120/80 mmHg.
High blood pressure puts you at increased risk for stroke, heart attack, and other life threatening disorders. Check your blood pressure regularly.

Lower your blood pressure... with no side-effects

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RESPeRATE and InterCure are trademarks of InterCure.

RESPeRATE is protected by US patent Nos 5423328, 6090037, 5803337 and 5076281 and other patents and pending patents.
Copyright © 2002

RESPeRATE is not intended to replace or modify any other treatment for high blood pressure recommended or prescribed by a physician

Product Key # 100102

8 18968 00102 7

Manufactured by:

InterCure

For more information or customer service visit www.resperate.com or call 1-877-988-9388

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Princeton, NJ 08540, USA

InterCure, Ltd.
Hamelacha 9, Kislev building
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batteries included

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Lower your blood pressure... with no side-effects

RESPeRATE

TO LOWER BLOOD PRESSURE

What is RESPeRATE

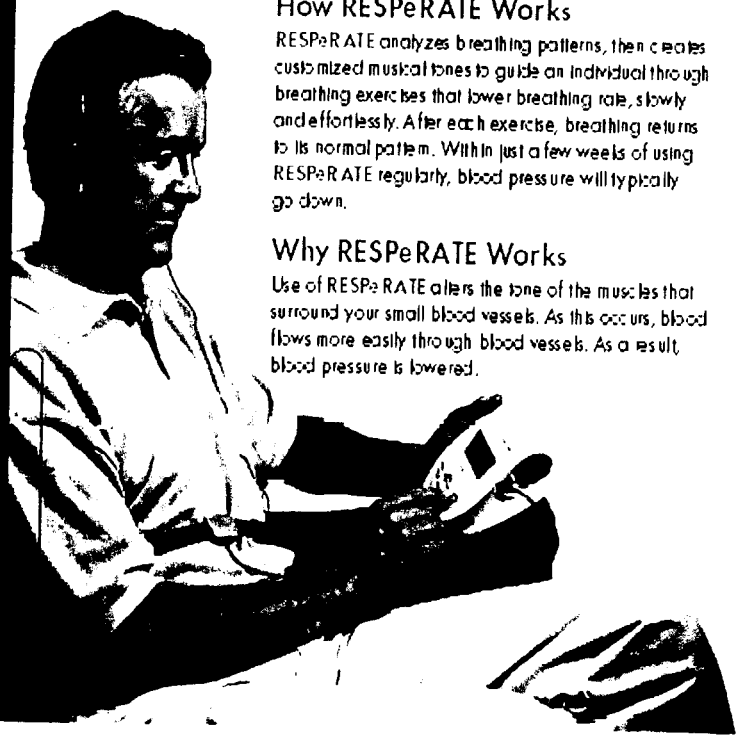
RESPeRATE is the only non-drug medical device clinically proven to lower blood pressure. It provides a new option for lowering blood pressure, which may be used safely along with medication or other lifestyle modifications such as diet and exercise.

How RESPeRATE Works

RESPeRATE analyzes breathing patterns, then creates customized musical tones to guide an individual through breathing exercises that lower breathing rate, slowly and effortlessly. After each exercise, breathing returns to its normal pattern. Within just a few weeks of using RESPeRATE regularly, blood pressure will typically go down.

Why RESPeRATE Works

Use of RESPeRATE alters the tone of the muscles that surround your small blood vessels. As this occurs, blood flows more easily through blood vessels. As a result, blood pressure is lowered.



RESPeRATE is...

Personalized

RESPeRATE's patented technology automatically creates a customized breathing exercise for each use.

Portable

RESPeRATE is lightweight and battery operated. The respiration sensor and belt are stored easily within the device and the headphones wrap snugly around it.

Easy to Use

Four easy steps.

1. Strap the sensor and belt over your clothes.
2. Turn on the device.
3. Breathe normally.
4. Listen and follow the musical tones that guide the breathing exercises.

The large keypad and display allows you to easily adjust volume, select melody and see exercise results.

Lower your blood pressure... with no side-effects

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Call Center Representative Instructions:

- Every call center representative will receive a training manual and extensive live product and sales training as well as ongoing monitoring by the call center manager.
- A call center representative or his/her backup will be available to answer the Resperate toll free line from Monday through Friday between the hours of 9 AM to 5:30 PM.
- During non-office hours, the Resperate toll free line will automatically go to the Resperate answering machine
- The Resperate answering machine will be checked each morning as well as every hour during working office hours.
- To check the answering machine: use mailbox number 771 and password 123456.
- When call center representative and backup are ready to receive calls, each will press the Resperate Button on their respective phones. A green light will then turn on and the phone screen will read "Available".
- When a call comes in through the Resperate toll free line, the phone screen will read "GRP C#" before the call is picked up.
- If call center representative or backup is on another call (Resperate or InterCure), he/she will not be able to receive calls through the Resperate line. However, he/she does not need to push the Resperate phone button off to read "Unavailable" – the phone will automatically recognize that he/she is on another call. The call will them jump to the next person (the backup) who is able to receive a Resperate call and has their button on.
- Only when the call center representative or the backup wishes to leave their desk must they push the Resperate button off. Make sure that someone else has their Resperate button on before you leave.

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InterCure
Interactive Therapeutic Devices

Name of customer:_____ **Device serial no:**_____ **Version:**_____
Date:_____ **Date of purchase:**_____

Main problem according to customer's complaint (if any):_____

_____

Memory statistics:

Memory #	meaning	units	MIN	reading	MAX	OK
All sessions						
1	No. of sessions with exercise stage	#	0		-	
2	No. of sessions not proceeding into exercise stage	#	0		-	
3	Average duration of Exercise stage	min	10		-	
Last up-to-ten sessions						
4	Average duration of recognition stage	min	0.3		1.5	
5	Average duration of exercise stage	min	10		-	
6	Average duration of effective exercise	min	6		-	
7	Average percent of breaths synchronized with the music	%	50		99	
8	No. of successful sessions	#	6		10	
9	No. of unsuccessful sessions due to effective exercise time shorter than 5 min	#	0		2	
10	No. of unsuccessful sessions due to low quality of respiration data	#	0		2	
11	No. of unsuccessful sessions due to breathing not synchronized with the music	#	0		2	
Last session						
12	Average duration of recognition stage	min	0.3		1.5	
13	Average duration of exercise stage	min	10		-	
14	Average duration of effective exercise	min	6		-	
15	Initial breathing rate	bpm	6		30	
16	Final breathing rate	bpm	3		10	
17	Quality of respiration data	%	65		99	
18	Percent of breaths synchronized with the music	%	50		99	

Summary of conversation and instructions given:_____

_____

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Technical Help Desk

A technical help desk for the Respi-Low device can easily solve customer's operation problems thanks to the data logger the device is equipped with.
The help desk operator asks the customer to go into the "stat" mode and read the 18 statistics memory numbers, by evaluating these numbers (see attached form for minimum and maximum and page 16-17 in the manual) one can solve almost all expected difficulties.

For example:

Memory		Meaning	Help Desk suggestion
#	Reading		
17	40%	quality of respiration data	move the sensor to a better position on his/her body
4	2min	Duration of recognition stage	Try to place sensor in another position on your body while in recognition stage
9	10	number of unsuccessful sessions due to short effective exercise time	perform longer sessions, with breath rate lower than 10 bpm

There are also error message and troubleshooting pages with solution instructions in the manual (see pages 14-15) that explain possible trouble in operating the device,

Problem	meaning	Action
Device does not work at all	Batteries are not functioning	Check polarity of batteries and correct if wrong. If not, replace batteries
Device can be turned on but then turns itself OFF	Batteries are empty	replace by new ones
Device is "stuck"		Take batteries out and place again
the IN/OUT icon disappears	You perform OK	If you still want it to appear, change tune and the arrows will reappear.
Icon shows arrows and headphones	Breathing is not synchronized with music	Select a basic melody with the music simplifier. Adjust your breathing to the "inhale" and "exhale" music notes.

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Automated Help-Desk

1) When comparing number of operations with the number of days the patient has the device**(this should be the first question**!), one can tell whether he operated everyday or even close to that.
2) If the number is greater than 4, the patient might have a problem with recognition phase (then see item 4, and see user manual page 11) or he is not taking the time to exercise as expected, and the person should be reminded to exercise the full time until music fades out (See user manual page 2).
3) If the device is preset to 15min of daily exercise and the number at this item is smaller then 10: either the recognition time is too long (then see item 4 and see user manual page 11) or the person is not taking the time to exercise as expected and he should be reminded to exercise the full time until music fades out (See user manual page 2).

4) If the time is greater then 1.5 min then the sensor might be misplaced or the patient's breathing is not stable, either move the sensor as demonstrated in the manual, or try to breath normally (See user manual page 10).

5) see item 3.

6) If the number is less than 6 min, the patient can't breath slower than ten bpm for at least 6 min, try to follow the music more precisely, select a simple melody and adjust your breathing to the inhale and exhale notes (see user manual pages 11,12,14).

7) If this number is less than 50, try to follow the music more precisely, select a simple melody and adjust your breathing to the inhale and exhale notes (see user manual pages 11,12,14).

8) If the number is between 6-7 to ten, it's ok, if less, then there is a problem in function, in that case refer to items 9,10,11.

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9) If this number is greater than 2, then there is a recurrent problem with session effective time, refer to item 6.

10) If this number is greater than 2, then there is a recurrent problem with the sensor placement. Move the sensor as demonstrated in the user manual page 10.

11) If this number is greater than 2, then there is a recurrent problem with following the music, try to follow the music more precisely, select a simple melody and adjust your breathing to the inhale and exhale notes (see user manual pages 11,12,14).

12) See item 4.

13) See item 5.

14) See item 6.

15) Should be in the range of 6-30, if not, the patient is not breathing normally or naturally.

16) Should be in the range of 3-10, if not, the patient does not achieve the target of the breathing exercise, refer to item 6.

The number in item 16 should be significantly lower than the number in item 15 and under ten.

17) If the number exceeds 50-99 then sensor is misplaced, refer to item 4 , or the patient is sitting incorrectly, sit back leaning on the back of the chair.

18) See item 7.

The value in item 5 should be better than number 3, the value in item 13 should be better than number 5, the value in item 14 should be better than number 6, if not, then there 's no inclination of improvement and the patient should get personal help over the phone.

From full download:

- If all lines in a session are identical – person didn't put on the sensor.
- If many of the lines are almost identical – person fell asleep.

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- If there are up and down "jumps" in bpm – person moves too much or breathing very unstable.

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ATTACHMENT 2

Substantial Equivalence Comparison Chart

The RESPeRATE and the Respi-Low are basically the same device except MINOR changes

The RESPeRATE and the Respi-Low predicate device have the same • Principles of operation • User interface • Hardware • Software Except the minor changes listed below		
Product Feature	InterCure Ltd.'s **RESPeRATE**	InterCure Ltd.'s Respi-Low (Predicate device)
Intended use	The RESPeRATE is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. OTC.	The Device is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. Rx
Indications for use	The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions.	The device is indicated for use only as an adjunctive treatment for high blood pressure, under the direction of a physician, together with other pharmacological and/or non-pharmacological interventions, as prescribed by the physician.
Sensor technology	Capacitance sensor belt that converts force to frequency changes converted to digital signal	Strain gauge that converts force into resistance changes with A to D converter
Communication	Communication port to PC available for download	Disabled communication port
Recognition phase	5 breath detection by a sohpisticated algorithm. Distinct tones with recognized breaths – different from interactive phase music	7 breath detection. Same music sound as in interactive phase

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ATTACHMENT 3

Predicate Device Labeling

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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INDICATIONS FOR USE

510(K) Number (if known): K000405

Device Name: InterCure Ltd. Respi-Low

Indications for Use:

The Respi-Low is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure under the direction of a physician, together with other pharmacological and/or non-pharmacological interventions as prescribed by the physician.

(PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

(Division Sign-off)

510(k) Number K000405

Prescription Use X OR Over-The-Counter Use_____

(Per 21 CFR 801.109)

(Division Sign-Off)
Division of General Restorative Devices
510(k) Number K000405

\\\DC - 67761/1 - #1090484 v1

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Respi-Low

Respi-Low is a hand-held, battery operated device. The device contains a computerized control unit, headphones and an innovative respiration sensor, mounted on the upper chest or abdomen (over the user's clothing).

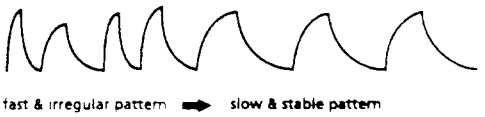
Respi-Low analyzes the user's breathing pattern and composes a sound pattern in accordance with the user breathing. The sound pattern interactively guides the user to a slow and regular breathing with prolonged expiration phase.

Blood pressure reductions achieved with **Respi-Low*** are comparable to the reductions observed in clinical trials using combined pharmacological and life style modification treatments†. Routine use of **Respi-Low** is recommended in order to maintain the lower levels of blood pressure.

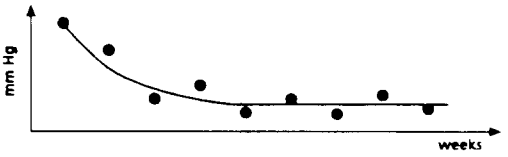
Respi-Low therapeutic effect is explained by a well-known neuro-physiological mechanism**. Slow and regular breathing movements induced by **Respi-Low**, are sensed by the stretch receptors (3) leading to increased effectiveness of the blood pressure control system, the baro-reflex loop§ (1,2,4), which is impaired in hypertensives.

* Results of clinical trials presented at the 17th scientific meeting of the International Society of Hypertension, Amsterdam, 1998 and Data on file.
† TOMHS Research Group, Arch Intern Med 1991 Jul; 151(7): 1413-23
** Daly M.de-B, Portland, London. pp 15-35., 1995.
§ Pitzalis MV et al., Cardiovasc Res. 1998, 38(2):332-9.

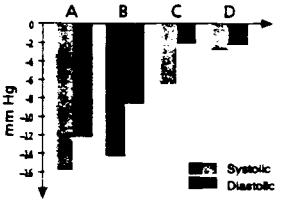
Breathing Pattern Modification



Typical Response to Respi-Low

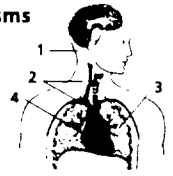


Response to Hypertension Treatments

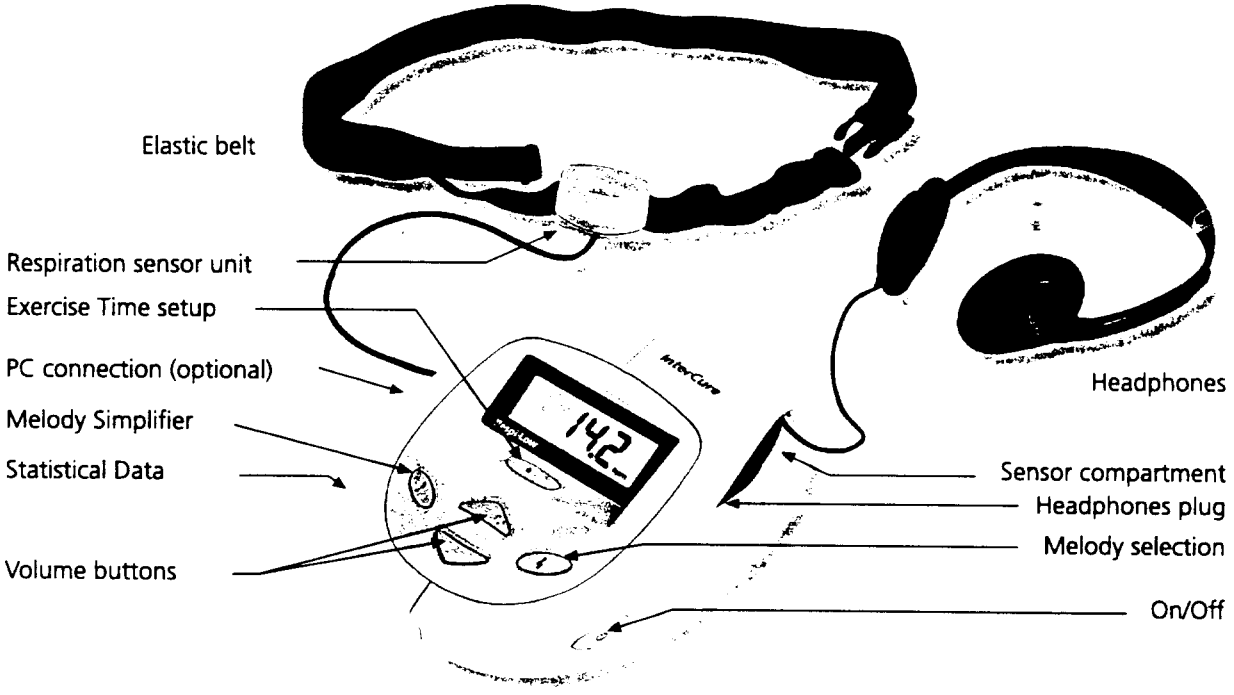


A. pharmacological and lifestyle modifications
B. Respi-Low
C. sodium restriction
D. weight reduction

Neuro-Physiological Mechanisms



1. Medulla
2. Baroreceptors
3. Stretch receptors
4. Pacemaker cells



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Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Respi-Low

An innovative device for high blood pressure reduction

An effective non-pharmacological treatment with no side effects

- **Respi-Low** leads to long-term, highly significant reduction of high blood pressure with no side effects, as shown in several well-controlled clinical trials.
- **Respi-Low** lowers high blood pressure by modifying the breathing pattern, which affects beneficially the neuro-physiological control systems of blood pressure.
- A typical reduction of 15/10 mm Hg in blood pressure is achievable within a few weeks of 15 minutes daily session with **Respi-Low**. Such reductions are comparable to those observed in clinical trials with pharmacological treatments.
- **Respi-Low** offers a non-pharmacological treatment, which complies with the latest consensus of hypertension treatment (JNC-6).
- **Respi-Low** is based on innovative technologies that enables a simple and easy operation at home.
- Data logging capability within the **Respi-Low**, enables the physician to quantitatively monitor the patient's compliance and quality of the treatment.

InterCure

Interactive Therapeutic Devices

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Model RL-108

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User Manual
Respi-Low

A revolutionary device for
reducing high blood pressure

InterCure
Interactive Therapeutic Devices

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Limited One Year Warranty	18

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Warnings and Precautions

- Respi-Low is a complimentary method for reducing high blood pressure. The use of Respi-Low is **not intended** to replace or modify any treatment for hypertension suggested by your physician.
- Modifying other hypertension treatments without the consent and care of your physician is at your own risk. The manufacturer and dealers of Respi-Low will not be held responsible whatsoever.
- Respi-Low **must not be used** when there is a need for alertness, concentration (for example when driving), and/or when using other equipment etc.
- If you experience side effects or if you feel any change in your general health or mood, contact your physician immediately
- **Do not use this device without consulting your physician,** if you suffer, or have suffered in the past from diabetes, respiratory or heart diseases.

Indication for use

The Respi-Low is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure under the direction of a physician, together with other pharmacological and/or non-phramacological interventions as prescribed by the physician.

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Introduction

High Blood Pressure - Risk and Current Treatments

The pumping action of the heart generates a pulsatile pressure in the blood vessel system. Systolic Blood Pressure is the maximum pressure generated when the heart contracts. Diastolic Blood Pressure is the minimal pressure generated when the heart relaxes. Blood pressure values are expressed by units of millimeters of Mercury (mm Hg).

When blood pressure exceeds its optimal values, namely 120/80 mm Hg (Systolic/Diastolic), there is a gradual and continuous increase in risk of heart failure, heart attacks, strokes, and kidney failure.

Recent classification of hypertension (JNC 6) suggests that people with blood pressure levels exceeding 130/85 mm Hg with no additional risk factors (Diabetes, heart failure etc.) should be treated by non-pharmacological means. If blood pressure levels exceed 140/90 and the non-pharmacological treatment is insufficient, the document suggest that drug therapy should be applied by phycisians.

How Respi-Low reduces high blood pressure

In order to reduce high blood pressure, Respi-Low guides the patient to slowdown and modify the breathing pattern through extending the expiration phase of the breathing.

Within several weeks of ten minute daily sessions, lower blood pressure levels can be achieved. This low blood pressure can be maintained by routine use of Respi-Low (as presented in the 17th Scientific Meeting of the International Society of Hypertension 7-11 June, 1998, Amsterdam, The Netherlands)

Respi-Low therapeutic effect is based on the neuro-physiological mechanism, by which breathing pattern modifications, if performed regularly and efficiently, will usually improve the long-term blood pressure control system to lower blood pressure values.

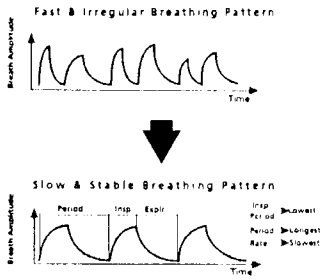
Respi-Low principle of operation

Respi-Low is a hand-held, battery-operated device containing a respiration sensor, computerized control unit and headphones.

Respi-Low modifies the user's breathing pattern, from fast & irregular to slow & stable breathing with extended expiration period.

Respi-Low utilizes the body's natural tendency to follow external rhythms and to "adjust" breathing to a desired pattern.

Respi-Low recognizes the user's breathing pattern using an innovative respiration sensor and proprietary signal analysis. The processed breathing signal is used for synthesizing musical sound patterns in real time. Sound pattern which is played through the headphones.



Respi-Low modifies the user's breathing pattern, from fast & irregular to slow & stable breathing with extended expiration period.

Following recognition of the user's breathing pattern, Respi-Low composes a musical sound pattern with rhythm and pattern slightly slower then the user's actual breathing pattern (extended musical expiration phase). The user then modifies the breathing pattern accordingly.

The modification process continues until the sound pattern is too slow for adaptation by the user. At this point, the Respi-Low interactively adjusts the sound pattern to the user's breathing. Once the sound pattern and breathing are synchronized Respi-Low will re-initiate the slowing process.

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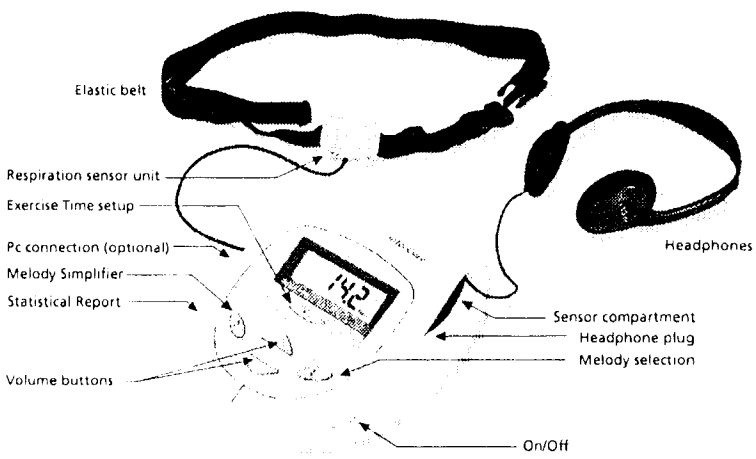
Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Know your Respi-Low Kit

Thank you for purchasing Respi-Low, the revolutionary non-pharmacological device for reducing high blood pressure.

Your Respi-Low kit contains:

- Respi-Low unit
- Respiration sensor fitted on an elastic belt
- Stereo headphone set
- Respi-Low case (optional)
- 4 x AA batteries
- User Manual
- Blood pressure home-measurement follow-up chart.
- Registration card



Quick start

1. **INSTALL** the **BATTERIES** noting correct polarity.
2. **TAKE OUT** the respiration **SENSOR** from its compartment.
3. **SIT** comfortably in a chair or an armchair.
4. **LOOSEN** belts, tight clothing etc. to ensure free breathing. Women should release tight underclothing such as bras.
5. Put on the sensor in the following way:
   - **PLACE** the elastic **BELT** around your upper abdomen.
   - **ADJUST** the belt size to fit snugly while you are in a sitting position.
   - **POSITION THE SENSOR UNIT**
     Women on the right side of the chest.
     Men in the center of the upper abdomen.
   - **SLIDE THE SENSOR UNIT** along the belt to ensure its free movement on the elastic belt.
6. **PLUG & WEAR THE HEADPHONES**.
7. **PRESS** the **ON/OFF** button.
8. **BREATHE NORMALLY** - There is no need for especially deep or slow breathing.

   Allow the Respi-Low to recognize your breathing. Throughout this stage the Respi-Low plays two different music notes synchronized with your breathing pattern.
9. **BREATHE ACCORDING TO THE MUSIC PATTERN.**

   The composed music will gradually and interactively guides you towards a slower and stable breathing pattern with an extended expiration phase.

We highly recommend that you read this manual before operating the device.

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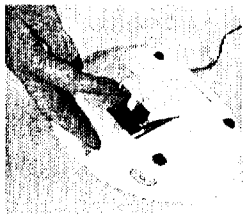
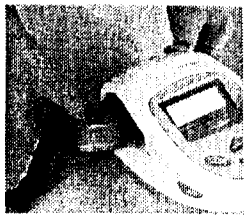
Operating Respi-Low

When using Respi-Low for the first time, **INSTALL THE BATTERIES** in the batteries compartment at the back of the Respi-Low unit. Note that the +/- poles of the batteries are inserted as printed inside the compartment (4 x AA batteries are supplied).



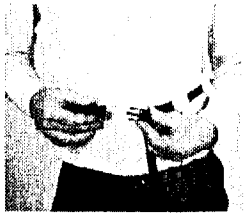
TAKE OUT the **BELT AND SENSOR** from its compartment.
Note that the sensor cable is pre-connected to the Respi-Low unit, please pull the cable with care.
At the end of the session, it is recommended that you return the sensor to its compartment.



SIT comfortably in a chair or an armchair.
LOOSEN belts, tight clothing etc. to enable free breathing.
Women should release tight underclothing such as bras.

Put on the sensor in the following way:

- **BUCKLE** the belt around your upper abdomen.



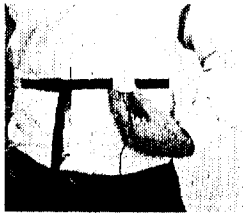
- **PLACE THE** elastic **BELT** as shown in the figures in the middle of the page.
  Women around the chest.
  Men around the upper abdomen.

  Make sure the elastic belt is fitted evenly and **not diagonally** across your chest or upper abdomen.

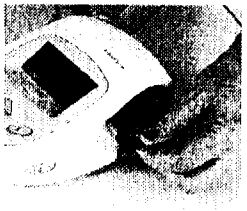
  The sensor uses the elastic belt to monitor the abdomen or chest movement. Therefore, the elastic belt should be positioned over the upper abdomen or chest depending on your personal breathing pattern. Men usually tend to abdominal breathing, while women have a tendency to thoracic (chest) breathing.
- **ADJUST** the belt size to fit snugly while you are in a sitting position. Make sure it is neither too tight nor too loose.
- **POSITION** the **SENSOR UNIT** as shown in the figures:

  Women on the right side of the chest.
  Men in the center of the upper abdomen.
- **SLIDE** the **SENSOR UNIT** along the belt to ensure free movement on the elastic belt.

Women


Men

PLUG THE HEADPHONES into their socket on the right side of the Respi-Low unit, as shown in the figure.



WEAR THE HEADPHONES.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Using Respi-Low

Respi-Low has two stages of operation, "recognition" and "Exercise Interactive Breathing":

- During the "Recognition" stage, the Respi-Low analyzes your breathing pattern in order to compose musical sound patterns for the "Exercise Interactive Breathing" stage.
- During the "Exercise Interactive Breathing" stage, the composed sound pattern gradually and interactively guides you towards a slower and stable breathing pattern with an extended expiration phase.

Stage I - "Recognition" of your breathing pattern

PRESS the **ON/OFF** button on the right side of the Respi-Low unit.

BREATHE NORMALLY - There is no need for especially deep or slow breathing.
Respi-Low recognizes and learns your breathing pattern.

During this stage, your breathing is accompanied by "inhale" and "exhale" arrows on the display, while two different music notes indicate the "inhale" and "exhale" phases of your breathing.

Both the arrows and the music notes should be synchronized to your breathing pattern. If not, or if an icon of a sensor belt appears on the display, then you should re-position or adjust the elastic sensor belt according to the instructions on the previous page.

After three breaths, Respi-Low begins to analyze your breathing pattern.
Each well analyzed breath is displayed as a vertical line.

Following the analysis of four stable breaths, Respi-Low automatically advances to the "Exercise Interactive Breathing" stage. After advancing, the unit will display the number of **breaths per minute (bpm)**, which is your current breathing rate, and will play a different melody.

If the "Recognition" stage lasts longer than two minutes, please refer to the troubleshooting section on page 15.

Stage II - "Exercise Interactive Breathing"

BREATHE ACCORDING TO THE SOUND PATTERN

The "inhale" and "exhale" arrows on the display are synchronized with the music pattern. Use them as a guide to synchronize your breathing with the sound pattern.

The arrows will disappear after one minute of interactive melody. At this point, close your eyes, relax with the melody and breathe according to its pattern.

Throughout the "Exercise Interactive Breathing" stage, Respi-Low presents your breathing rate (the number of breaths per minute) on the display.

In addition, Respi-Low uses a flashing point to indicate that your breathing is monitored correctly. The flashing point is synchronized with the "inhale", "exhale" phases of your actual breathing. If the point is not synchronized with your breathing or does not flash, reposition the sensor belt.

Respi-Low composes musical sound patterns according to your personal breathing pattern, but plays it slower with an extended exhale phase. Therefore, as you breathe in accordance with the sound pattern, your breathing will be modified.

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The process will continue as long as you breathe along with the sound pattern.
Whenever you feel that the sound pattern is too slow or too fast, and you are uncomfortable, breathe at your own breathing rate. Within 30 seconds, Respi-Low will automatically adjust the sound pattern toward your breathing rate, and then will re-initiate the slowing process based on your current rate.

By default, Respi-Low automatically shuts down after 15 minutes of the "Exercise Interactive Breathing" stage.
In order to change this default please refer to page 13.

Adjusting Music Volume

PRESS the **UP** or **DOWN** buttons.
The icon will be displayed along with the current volume level (01-10 levels).

PRESS AGAIN until you reach the preferred volume level.

After a few seconds, Respi-Low automatically returns to the breath per minute (bpm) display.

Selecting Melody

PRESS the **MELODY SELECT** button.
The icon will be displayed along with the current melody number.

PRESS AGAIN until you reach the preferred melody, or use the **UP** or **DOWN** buttons to scroll.

For your convenience, Respi-Low stores your last preferred melody, and then uses it next time you start your Exercise session.

Adjusting Music Simplifier

The Respi-Low music is composed by a basic melody layer overlaid with additional music "decoration" layers. You can "simplify" the music by removing these "decoration" layers.

Use this function if you find it difficult to follow the "inhale" and "exhale" parts of the sound pattern.

PRESS the **MUSIC SIMPLIFIER** button.

The icon will be displayed along with the current Music Simplifier Level (01 for simple and 02 full melody).

PRESS AGAIN to add or remove the music "decoration" layers.

For your convenience, Respi-Low stores your last preferred Music Simplifier Level, and then uses it next time you start your Exercise session.

Setting Exercise Time

The exercise time default is set at 15 minutes. Respi-Low automatically switches-off at the end of the defined exercise time. This function allows you to set the exercise time.

PRESS the **EXERCISE TIME** button.

The icon will be displayed along with remaining time of the present Exercise session

PRESS AGAIN until you reach the preferred duration, or use **UP** or **DOWN** buttons to scroll.

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Error Messages

Icon	Meaning	Action
	Sensor belt is too tight.	Loosen the belt. The icon will disappear when the belt is properly set.
	Sensor belt is too loose	Tighten the belt. The icon will disappear when the belt is properly set.
	• The elastic belt is improperly positioned • The sensor unit is improperly positioned.	• Reposition the elastic belt according to the instructions. Note if you have abdominal or chest breathing and place the belt accordingly. • Reposition the sensor unit according to the instructions.
	Breathing is not synchronized with the melody.	Select a basic melody with the Music Simplifier. Adjust your breathing to the "inhale" and "exhale" music notes. Alternatively you may wish to select a different melody.
30.0	You are breathing more than 30 breaths per minute.	Try to breathe slower.
	Batteries are weak.	Replace the batteries.

Troubleshooting

Problem	Meaning	Action
The display does not light when the device is switched on	• Batteries are not installed. • The +/- poles of the batteries are the wrong way around.	• Install the batteries • Re-install the batteries with the +/- poles the correct way.
No music is played through the headphones	• The headphones are improperly connected. • The Respi-Low has automatically switched-off as the session is completed.	• Reconnect headphones. • Restart Respi-Low
Respi-Low displays the fourth vertical line and does not proceed to Exercise stage	• The sensor is improperly positioned • Breathing is unstable	• Reposition the sensor. • Relax and breathe normally

If you did not overcome the problem phone the company's customer support line.

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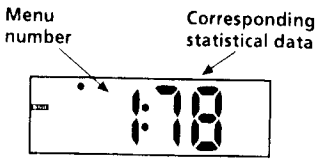
Advanced functions - Statistical Report

The "Statistical Report" function enables you to assess the quality of previous Respi-Low sessions, by displaying three menus of average parameters: accumulating data; the last ten sessions; the last session.

SWITCH-OFF Respi-Low.

PRESS the STAT button on the left side of the Respi-Low.

The Icon will be displayed along with the first statistical menu. **SCROLL** through the parameters using the **UP** or **DOWN** buttons.



Statistical report of all sessions

Menu	Data	Display Example	Meaning
1	78	**1:**78	No. of sessions with Exercise stage = 78 sessions
2	23	**2:**23	No. of sessions **not** proceeding into Exercise stage = 23 sessions
3	12	**3:**12	Average duration of Exercise stage = 12 min.

Statistical report of last 10 sessions

Menu	Data	Display Example	Meaning
4	0.7	**4:**0.7	Average duration of recognition stage = 0.7 min
5	14	**5:**14	Period in which the last ten sessions occurred = 14 days
6	07	**6:**07	No. of "Successful" sessions = 7 sessions
7	02	**7:**02	No. of "Unsuccessful" sessions due to short duration (less than 5 min.) = 2 sessions
8	01	**8:**01	No. of "Unsuccessful" sessions due to incomplete respiration data = 1 session
9	01	**9:**01	No. of "Unsuccessful" sessions due to breathing not synchronized with the music = 1 session

Statistical report of last session only

Menu	Data	Display Example	Relevant Data
10	0.9	**10:**0.9	Duration of recognition stage = 0.9 min
11	13	**11:**13	Duration of Exercise stage = 13 min
12	72	**12:**72	Quality of respiration data = 72% of "good" data
13	14	**13:**14	Initial breathing rate = 14 bpm
14	07	**14:**07	Final breathing rate = 7 bpm
15	86	**15:**86	Percent of time when breathing was synchronized with the music = 86%

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Limited One Year Warranty

Your Respi-Low, model No. RL-108, is warranted to be free from manufacturing defects for a period of one year under normal use. this warranty extends only to the original retail purchaser.

Should repair be needed within the warranty period, send the unit to the distributor or the nearest service station. Be sure to include the serial and model numbers of your unit and your phone number or any correspondence.

We will repair or replace (at our option) free of charge any parts necessary to correct defects in the materials or workmanship.

The above warranty is complete and exclusive. The warrantor expressly disclaims liability for incidents, special, or consequential damage of any nature. (Some countries do not allow the exclusion or limitation of incidental or consequential damages, so the above limitation may not apply to you).

Any implied warranties arising from the operation of law shall be limited in duration to the terms of this warranty. (Some countries do not allow limitations on how long an implied warranty lasts, so the above limitation may not apply to you).

This warranty gives you specific legal rights and you may have other rights which vary from country to country. As a condition to operation of your warranty, the enclosed registration card must be completed and sent to us within 21 days from the date of purchase.

For customers service in Israel call: 972-2-5337746

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENT 4

Upgrading Safety Tests and Certifications

-IEC 60601-1

-IEC 601-2

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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מתי **The Standards Institution of Israel**

This is to certify that:

Non invasive blood pressure reduction device

CERTIFICATE OF CONFORMITY

Model: RESPeRATE (RR-150)

Manufactured by: InterCure Ltd.
Address: 9 Hamelacha St., Kislev Bldg.,
Lod 71520 , ISRAEL

Has been tested by SII and was found to comply with the requirements of :

EN 60601-1 : "Medical Electrical Equipment"
Part 1: "General requirements for safety"
Second Ed. (1990), including amendments
#1(1993), #2(1995), #12(1993), #13(1996).

" ת"י 1011 חלק1 : **Medical Electrical Equipment"**
Part 1: "General requirements for safety"
(מרס 1998)

Test results are detailed in SII's Test Report No.: 8112311773

Certificate no.: 8112311773

Date of issue: 07/08/01

STELI LOZNEN, M.Sc.
Senior Medical Devices Engineer
(b)(4) Laboratory

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IECEE CB-Scheme

Ref. Certif. No.

IL90

IEC SYSTEM FOR MUTUAL RECOGNITION OF TEST CERTIFICATES FOR ELECTRICAL EQUIPMENT (IECEE) CB SCHEME

SYSTEME CEI D'ACCEPTATION MUTUELLE DE CERTIFICATS D'ESSAIS DES EQUIPEMENTS ELECTRIQUES (IECEE) METHODE OC

CB TEST CERTIFICATE
CERTIFICAT D'ESSAI OC

Product Produit	Non invasive blood pressure reduction device
Name and address of the applicant Nom et adresse du demandeur	InterCure Ltd. 9 Hamelacha St., Kislev Bldg., LOD 71520 ISRAEL
Name and address of the manufacturer Nom et adresse du fabricant	Same as above
Name and address of the factory Nome et adresse de l'usine	InterCure Ltd. 9 Hamelacha St., Kislev Bldg., LOD 71520 ISRAEL
Ratings and principal characteristics Valeurs nominales et caractéristiques principales	4x1.5V size AA Alkaline batteries
Trademark (if any) Marque de fabrique (si elle existe)	
Model / Type Ref. Ref. De type	RESPeRATE (RR-150)
Additional information (if necessary) Information complémentaire (si nécessaire)	
A sample of the product was tested and found to be in conformity with Un échantillon de ce produit a été essayé et a été considéré conforme à la	**PUBLICATION** IEC 60601-1: 1988 Including Amendments 1 and 2 — **EDITION** Second Ed.
As shown in the Test Report Ref. No. which forms part of this Certificate Comme indiqué dans le Rapport d'essais numéro de référence qui constitue partie de ce Certificat	8112311773

This CB Test Certificate is issued by the National Certification Body
Ce Certificat d'essai OC est établi par l'Organisme **National de Certification**

מתי

The Standards Institution of Israel
42 Chaim Levanon St.
Tel-Aviv 69977, Israel

Michael Levinkron
Head of Telematics Lab.

Date: 07/08/01

Signature:

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118
Issued 2000-02

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ATT. 1

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

Figure 2. EUT's general view

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Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENT 5

Engineering Chart of the Device

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENT 6

Software Information

1. Level of Concern

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2. Verification and Validation

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3. Summary of test

(b)(4)

[redacted]

3.3 Error Messages

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ATTACHMENT 7

OTC Clinical Study Report

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1. BACKGROUND

1.1 Hypertension and Cardiovascular Risk

Hypertension, or "high blood pressure," is the leading cause of heart disease, stroke and kidney failure, and is one of the most widespread chronic conditions in the world. Experts estimate that over 20% of the world's population suffers from hypertension. In the United States alone, hypertension affects over 50 million people, nearly one in four adults [Burt 1995]. Moreover, while about half of hypertensive patients are treated with medications [Burt 1995], 76% of these patients still do not have their high blood pressure under control (*i.e.*, patient having BP > 140/90 mm Hg) [Frohlich 1995].

1.2 Non-Pharmacological Treatment: Lifestyle Modification

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1.3 The Effect of Slow Breathing on the Cardiovascular System

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[redacted]

1.4 Breathing Exercises in Treating Hypertension

The efficacy of breathing exercises in the treatment of hypertension has been known for many years [Tirala 1936]. In addition, numerous controlled

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studies published in the medical literature [e.g., Patel 1975 & 1985; Irvine 1986, Kikuchi 1993] have shown that it is possible to reduce hypertension with behavioral methods. The beneficial results of these behavioral methods were often rationalized as having eliciting the "relaxation response" (a psychophysiological concept suggested by Dr. Herbert Benson at Harvard) [Benson 1974]. However, a major component of each of these behavioral methods was slow breathing exercises, the benefit of which can be attributed to physiological mechanisms, as explained above [Gavish, 2001].

1.5 Device-Guided Breathing Exercises

To achieve these known benefits of slow breathing exercises, the RESPeRATE device safely and effortlessly guides the user to change his existing breathing pattern, which may be fast and irregular, into a slow and regular one. RESPeRATE achieves this by creating an interaction between the breathing pattern and a musical (sound) pattern [Gavish 1991]. The RESPeRATE technology is described in Section7B. RESPeRATE's ability to bring the user to a slow and regular breathing pattern within a few minutes has been demonstrated in a controlled study [Gavish, 1995].

1.6 Previous Studies Using the Predicate Device in Treating Hypertension

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(b)(4)

[redacted]

2. SUMMARY OF CLINICAL STUDIES

2.1 Rationale for OTC Study

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[redacted]

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2.2 Study Design

2.2.1 Hypothesis

The study design was intended to assess the following hypothesis: "RESPeRATE device (RR), if used daily at home for 2 months (8 weeks) in an OTC configuration, can reduce BP safely and efficaciously" (from the OTC Trial Protocol). "Reducing BP" is quantified by the primary endpoint: The change in office systolic BP change from Baseline to End during the 8-week treatment period.

2.2.2 Design

The data presented here are from two independent, multi-center studies using patients recruited from the same clinics.

A **Randomized Study** (**R**-Study) included 123 patients randomized into Treatment and Control groups.

A **Non-Randomized** Study (**NR**-Study) included 26 patients assigned to a Treatment group only.

The **Randomized Study** design included the following (see Figure 1):

(b)(4)

- [redacted]
- [redacted]
- [redacted]
- [redacted]

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(b)(4)

- [redacted]
- [redacted]
- [redacted]

The Non-Randomized Study design was identical to the design for

(b)(4)

[redacted]

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(b)(4)

[redacted]

2.2.3 Compliance Bias Created by Study Design

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[redacted]

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In order to clarify this point let us describe the study from the patient's eye using the following scenario of events (see also Informed Consent in **Attachment 7.1**):

1st visit at the clinic:

(b)(4)

- (b)(4)

2nd visit at the clinic:

(b)(4)

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- (b)(4) [redacted]
- [redacted]
- [redacted]
- [redacted]

3rd and 4th visit at the clinic:

- (b)(4) [redacted]

Device Return:

- The "Equipment Supplier" calls and arrange the system collection from home.

2.3 (b)(4) [redacted]

2.3.1 [redacted]

2.3.1.1 Rationale for Method

(b)(4) [redacted]

- (b)(4) [redacted]
- [redacted]

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Which means

- (b)(4) [redacted]

(b)(4) [redacted]

Table 1 Evaluation of "Appropriate Use"

Attributes of "Appropriate Use"	Evaluation Criterion
(b)(4) [redacted]	

It is important to note that:

(b)(4) [redacted]

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(b)(4)

[redacted]

2.3.1.2 Accountability

Table 2 includes ALL RR devices, irrespective of clinical outcomes or inclusion in the population of patients who completed one or more follow-up office visits.

Table 2: Accountability of RR devices

	Treatment
	(b)(4) [redacted]
Devices delivered to patients	
Returned devices	
Devices used at least once	

As shown in **Table 2**, two patients in the Randomized Study and two patients in the Non-Randomized Study did not return the devices at the end of the study for data download, despite repeated requests by the CRO. Of the 85 patients

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(b)(4)

[redacted]

2.3.1.3 Results

Results from ALL patients who used the RR device include (see **Table 3**):

(b)(4)

- [redacted]
- [redacted]

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(b)(4)

- [redacted]
- [redacted]
- [redacted]

Table 3: Evaluation of RR "Appropriate Use"

	Treatment
	(b)(4) [redacted]
# of patients who used RR at least once	
Patients who achieved Slow Breathing (SB) (%)	
Average % session time spent in SB	
% session time with analyzable respiration signal	
Session duration (Mean+SD)	

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2.3.1.4 Calls to Technical Help Desk

None of the patients in the Randomized Study called the Technical Help Desk for help associated with understanding IFU (**Table 4**).

Table 4 : Calls to Techical Help Desk

Subject of Call	Treatment (n=63)	Control (n=60)
RESPeRATE	1*	N/A
BPM or General	3	4

*Noise in headphones

2.3.1.5 Conclusions

The RESPeRATE device can be self-operated appropriately by hypertensive patients.

2.3.2 Evaluation of Efficacy

2.3.2.1 Accountability

(b)(4)

[redacted]

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first follow-up visit carried forward for the purpose of the efficacy analysis (**Table 5**).

Table 5: Accountability for efficacy evaluation

	Randomized		Non-Randomized	Pooled
	Treatment	Control	Treatment	Treatment
Received device	(b)(4) [redacted]			
Completed 1 or more follow-up visits				
Completed 2 follow-up visits				

Table 6 provides a tabulation of the reasons why the 10 patients missed both follow-up visits.

Table 6: Reasons for missing follow-up visits

	Randomized		Non-Randomized
	Treatment	Control	Treatment
Protocol violation – changed medication	(b)(4) [redacted]		
Not cooperative			
Personal / Family / Job			
Protocol violation not assoc. with medic.			
No reason given			
Total			

[1] Three out of four these patients were using the devices infrequently or did not use the devices at all (see also Section 2.2.3).

2.3.2.2 Baseline Characteristics

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(b)(4)

[redacted]

Table 7: Baseline characteristics at office and office-to-home BP and heart rate (HR) differences

	Randomized			Non-Randomized
	Treatment	Control	p-value	Treatment
OFFICE	(b)(4) [redacted]			
% males				
Age				
% medicated				
BMI (kg/m2)				
Systolic BP (mmHg)				
Diastolic BP (mmHg)				
Heart Rate (bpm)				
% ISH				
Office-To-Home Difference	n=51	n=56		n=23
Systolic BP (mmHg)	(b)(4) [redacted]			
Diastolic BP (mmHg)				
Heart Rate (bpm)				

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There were no statistically significant differences in baseline characteristics between the randomized treatment group and non-randomized treatment group. Comparisons between the pooled treatment groups and the control group had similar levels of statistical significance as with the randomized groups shown above.

Baseline Home BP and HR: Defined for the individual patient as the

(b)(4)

[redacted]

Office-to-Home BP and HR Differences: It is well known that both BP

(b)(4)

[redacted]

(b)(4)

[redacted]

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(b)(4)

[redacted]

2.3.2.3 *Primary Outcome: Comparison by Group*

(b)(4)

[redacted]

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Table 8: Systolic BP change unadjusted and adjusted by covariate analysis

Office Systolic BP Changes from Baseline to End of Treatment (mmHg)	Unadjusted			Adjusted[2]		
	Treatment	Control	p-value	Treatment	Control	p-value[1]
Randomized Study Mean+SE	(b)(4) [redacted]					
Pooled Studies Mean±SE						

(b)(4) [redacted]

2.3.2.4 Rationale for Subgroup analysis

(b)(4) [redacted]

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(b)(4)

[redacted]

2.3.2.5 Relationship between BP Response and Compliance

Figure 2 demonstrates that more time spent in Slow Breathing with RR during the 8-week treatment period elicits greater BP reduction.

(b)(4)

[redacted]

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Figure 2: Relationship between BP response and accumulated Slow Breathing

Accumulated Slow Breathing Time
Over 8 Weeks (minutes)

(b)(4)

[redacted]

2.3.2.6 Subgroups of High and Low RR Users

(b)(4)

[redacted]

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(b)(4)

[redacted]

Table 9: Comparison of primary outcome by subgroups of High- and Low RR users.

	Treatment
Office Systolic BP changes (mmHg)	(b)(4) [redacted]
Randomized	
Pooled	

Mean±SE

* Includes patients who have used the RR at least once.

The results for the Diastolic and HR changes (secondary outcomes) are shown in **Table 10**.

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Table 10: Comparison of secondary outcomes by subgroups of High- and Low RR users.

	Treatment		
Office DBP and HR Changes	**High-RR Users**	**Low-RR Users**	**p-value**
Diastolic BP (mmHg)			
Randomized	(b)(4) [redacted]		
Pooled			
HR (bpm)			
Randomized			
Pooled			

Mean±SE

These data demonstrate that when patients spend sufficient time in Slow Breathing (High-RR Users) they can achieve clinically significant BP reduction.

2.3.2.7 Outcomes of High RR Users Versus Control

In the Randomized Study, the [redacted] (b)(4) reduction displayed by [redacted] (b)(4) [redacted]

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Table 11: Comparison of outcomes between the High-RR Users subgroup and Control

	Randomized	Pooled
Changes from Baseline	(b)(4) [redacted]	
Systolic (mmHg)		
Diastolic (mmHg)		
HR (bpm)		

Mean±SE

(b)(4) [redacted]

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2.3.3 Evaluation of Safety

2.3.3.1 Method

(b)(4)

[redacted]

2.3.3.2 Comparison Between Groups

As shown in **Table 12**, the use of RR does not add any additional risk to using digital BP monitor.

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Table 12: Classification of Adverse Events in the Patients with Follow-up Visits.

	Treatment			Control		
	Mild	Moderate	Severe	Mild	Moderate	Severe
Cardiovascular	(b)(4) [redacted]					
Other						
Total						

[1] For Treatment:
For Control:

[2] For Treatment:
For Control:

(b)(4) [redacted]

2.3.3.3 Conclusions for Safety and Efficacy

The RESPeRATE device, if used as recommended, lowers high BP safely and effectively.

2.4 Overall Conclusions

1. Can patients operate the RR appropriately with available Instructions For Use, without physician training?

   YES

2. Does the use of RR under OTC conditions still reduce office BP?

   YES

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Informed Consent

Name of Investigator: _____

Telephone number: _____

Address of study site: _____

Title: **Assessing the Efficacy of a System for Controlling Blood Pressure**

INTRODUCTION:

You are being invited to take a part in a research study at [SITE NAME]. You are being invited to participate in this study because you have high blood pressure, which put you at risk for heart disease, stroke and kidney disease.

The present study is designed to evaluate two questions:

I) **What is your "real" blood pressure?** It is well known that for most people blood pressure fluctuates. The blood pressure fluctuation may depend on the time of day, your emotional state, and even where you are when the blood pressure is measured. Therefore, in different visits at the clinic the doctor may find different and varying blood pressure levels, which makes it difficult for the healthcare provider to make the appropriate decision regarding treatment and evaluating the success of a treatment.

II) **How can you help your doctor?** We know that patients, who are aware of their blood pressure, usually feel more responsible for their own health and take seriously any physician suggested treatment. However, this requires the patient to measure and document his/her own blood pressure. Although this procedure gives the patient and the doctor important information, it may be burdensome the patient and is subject to errors in reading and recording the pressure.

PURPOSE OF THE STUDY

This study involves research, with the purpose of evaluating a computerized system for controlling blood pressure to be used daily at home. The system measures, displays and records the blood pressure as well as other physiological quantities related to blood pressure. The system is simple to learn and to operate, does not cause any inconvenience and does not create any risk to your health. The system records all data automatically and does not require you to record any data. The data stored in system are downloaded at the clinic and a report is prepared.

In this study, we will evaluate two types of systems that differ in the type of physiological quantities, other than the blood pressure, measured by the system.

The study involves (b) patients at 5 clinics. The total time requested for your participation is 8-9 weeks.

Procedures

Your doctor will perform a physical examination and document your medical history, medications, lifestyle and symptoms that may be related to high blood pressure. By the end of this visit you will receive a short training in measuring your own blood pressure. A few days later, one of the two systems will be delivered to your home. The system you receive will be selected by chance (like flipping a coin).

You are required to use the system daily for 8 weeks; you will visit the clinic after 4 weeks, 8 weeks at the end of the study. In the last visit the doctor will repeat the same procedures as done today.

The system would be pickup from your home after the last visit.

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Expectations

You are required to use the system twice daily, once in the morning and once in the late afternoon or evening, following the instructions written in user's manual attached to the system. The total time required for operating the system is not more than 20-30 minutes per day. It is essential that you will use the system twice daily, as directed. We therefore expect you to devote the required time if you decide to enroll in the study. If you plan an activity during the study period that will prevent you from using the system routinely, please tell the study staff before signing this form.

You are required to notify the study staff of any change in blood pressure medication. Do not modify you present lifestyle e.g. changing amount of physical activity or cigarettes or alcohol consumption, without the approval of the study doctor.

The system should be used in a quiet room, without your being disturbed by other people or by performing activities that require your attention (e.g. talking, using phone, watching TV, reading etc.). The system should be operated in a comfortable sitting position, after at least 5 minutes of rest. During the 30 minutes preceding the use of the system you should refrain from smoking, physical exercises or ingesting caffeine, which are known to affect blood pressure.

In case of any question or problem the operating the system or getting any indication that the system does not work as described to you in the manual, we expect you to call the Technical Help Desk toll-free number 1-800-[PHONE #] for assistance.

Do not allow anybody else, including your family, to use the system. If somebody does use it unintentionally, write down the date and time.

Do not disclose details about your system to the study doctor in order to enable him/her an objective evaluation of both systems, which are under study.

POTENTIAL RISK AND DISCOMFORT

All the procedures used in this study at the clinic are standard of care and do not involve foreseeable risk or discomfort for you.

The system is experimental, but its operation does not include any potential risk for your health or discomfort.

None of the procedures applied in this study involve any foreseeable psychological, emotional or financial risk for you.

POSSIBLE BENEFITS

(b)(4) [redacted] DO WE HAVE TO STATE THE FIRST SENTENCE, OR ALTERNATIVELY STATING: THERE MAY BE NOT A DIRECT EFFECT ON BLOOD PRESSURE LEVEL OF THOSE WHO PARTICIPATING THE STUDY.]

There may be no personal benefit for participating in this study. However, the data obtained by the system may provide valuable information for future decision about changing, optimizing or suggesting further treatment for reducing your high blood pressure. We hope that the study will benefit others, on the future, by enabling them to be on the alert concerning their own health, using advanced technologies.

ALTERNATIVES TO PARTICIPATION

There are numerous medications available to treat high blood pressure and there are home blood pressure monitors available. You can continue on the present course of evaluation and treatment, or based on discussion with the physician, utilize medication or other device for the evaluation and control of your blood pressure.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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COST AND COMPENSATION

There will be no cost to you for the system provided to you during the study, or for the visits at the clinic. You will have free parking when visit the clinic. In addition, participants who will meet all the requirements of the study and will want to continue using the system, would receive the system for free.

(b) [redacted] IS THAT OK FORM REGULATORY AND LIABILITY POINTS OF VIEW?]

VOLUNTARY PARTICIPATION

All participation is voluntary. There is no penalty to anyone who decides not to participate. Nor will be anyone penalized if he or she decides to stop participation at any time during the research project. All participants will be notified of any new developments that may influence their decision to continue their participation.

RESEARCH RELATED INJURIES

Not needed as this is a minimal risk study.

CONFIDENTIALITY

Records of participation in this research project will be maintained and kept confidential to the extent permitted by law. In all forms sent to the sponsor, you would be identified only by a code with no other identifying information. The study files may be inspected by the Food and Drug Administration, by the Institutional Review Board, who approved the study or other governmental authorities, and by the study sponsor (InterCure Ltd.). The study results may be published, although the published report will not identify you in any way.

QUESTIONS

Questions are encouraged.

For questions about the system used you may contact the Technical Help Desk at toll-free number 1-800-[PHONE #] ONLY AFTER RECEIVING THE SYSTEM.

For any other question about this research project, please contact [Name, area code and phone number].

For questions about the rights of research subjects may be addressed to the [OFFICE, ADDRESS] at [PHONE #].

By signing below, you are consenting to participation in this research study, that you have read this form and that all of your questions have been answered. You will be given a copy of this consent.

_____

Print name of Subject Date

_____

Signature of Subject Date

_____

Person Conducting Consent Discussion Date

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENT 8

Financial Disclosure Certificate

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Food and Drug Administration

Form Approved: OMB No. 0910-0396
Expiration Date: 3/31/02

CERTIFICATION: FINANCIAL INTERESTS AND ARRANGEMENTS OF CLINICAL INVESTIGATORS

TO BE COMPLETED BY APPLICANT

With respect to all covered clinical studies (or specific clinical studies listed below (if appropriate)) submitted in support of this application, I certify to one of the statements below as appropriate. I understand that this certification is made in compliance with 21 CFR part 54 and that for the purposes of this statement, a clinical investigator includes the spouse and each dependent child of the investigator as defined in 21 CFR 54.2(d).

Please mark the applicable checkboxes.

■ (1) As the sponsor of the submitted studies, I certify that I have not entered into any financial arrangement with the listed clinical investigators (enter names of clinical investigators below or attach list of names to this form) whereby the value of compensation to the investigator could be affected by the outcome of the study as defined in 21 CFR 54.2(a). I also certify that each listed clinical investigator required to disclose to the sponsor whether the investigator had a proprietary interest in this product or a significant equity in the sponsor as defined in 21 CFR 54.2(b) did not disclose any such interests. I further certify that no listed investigator was the recipient of significant payments of other sorts as defined in 21 CFR 54.2(f).

Clinical Investigators		
	Dr. [redacted] (b)	Dr. (b)(4) [redacted]
	Dr. (b)(4) [redacted]	
	Dr. (b)(4) [redacted]	

☐ (2) As the applicant who is submitting a study or studies sponsored by a firm or party other than the applicant, I certify that based on information obtained from the sponsor or from participating clinical investigators, the listed clinical investigators (attach list of names to this form) did not participate in any financial arrangement with the sponsor of a covered study whereby the value of compensation to the investigator for conducting the study could be affected by the outcome of the study (as defined in 21 CFR 54.2(a)); had no proprietary interest in this product or significant equity interest in the sponsor of the covered study (as defined in 21 CFR 54.2(b)); and was not the recipient of significant payments of other sorts (as defined in 21 CFR 54.2(f)).

☐ (3) As the applicant who is submitting a study or studies sponsored by a firm or party other than the applicant, I certify that I have acted with due diligence to obtain from the listed clinical investigators (attach list of names) or from the sponsor the information required under 54.4 and it was not possible to do so. The reason why this information could not be obtained is attached.

NAME	TITLE
ZOHARA SABAN	DIRECTOR OF FINANCE
FIRM / ORGANIZATION: INTERCURE, Ltd	
SIGNATURE: [signature]	DATE: 2/5/02

Paperwork Reduction Act Statement

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Public reporting burden for this collection of information is estimated to average 1 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the necessary data, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information to the address to the right:

Department of Health and Human Services
Food and Drug Administration
5600 Fishers Lane, Room 14C-03
Rockville, MD 20857

FORM FDA 3454 (3/99)

BF Created by Electronic Document Services/USDHHS: (301) 443-2454

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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dEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Food and Drug Administration

Form Approved: OMB No. 0910-0396
Expiration Date: 3/31/02

DISCLOSURE: FINANCIAL INTERESTS AND ARRANGEMENTS OF CLINICAL INVESTIGATORS

TO BE COMPLETED BY APPLICANT

The following information concerning , Dr. (b)(4) [redacted] , who participated as a clinical investigator in the submitted study "InterCure RESPeRATE OTC study"
Name of the clinical investigator

, is submitted in accordance with 21 CFR part

54. The named individual has participated in financial arrangements or holds financial interests that are required to be disclosed as follows:

Please mark the applicable checkboxes.

☐ any financial arrangement entered into between the sponsor of the covered study and the clinical investigator involved in the conduct of the covered study, whereby the value of the compensation to the clinical investigator for conducting the study could be influenced by the outcome of the study;

☐ any significant payments of other sorts made on or after February 2, 1999 from the sponsor of the covered study such as a grant to fund ongoing research, compensation in the form of equipment, retainer for ongoing consultation, or honoraria;

☐ any proprietary interest in the product tested in the covered study held by the clinical investigator;

■ any significant equity interest as defined in 21 CFR 54.2(b), held by the clinical investigator in the sponsor of the covered study.

Details of the individual's disclosable financial arrangements and interests are attached, along with a description of steps taken to minimize the potential bias of clinical study results by any of the disclosed arrangements or interests.

NAME	TITLE
ZOHARA SADAN	DIRECTOR OF FINANCE
FIRM / ORGANIZATION	
INTERCURE LTD	
SIGNATURE	DATE
[signature]	2/4/02

Paperwork Reduction Act Statement

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Public reporting burden for this collection of information is estimated to average 4 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the necessary data, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information to:

Department of Health and Human Services
Food and Drug Administration
5600 Fishers Lane, Room 14C-03
Rockville, MD 20857

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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InterCure™

Interactive Therapeutic Devices

February 4, 2002

VIA HAND DELIVERY

510(k) Document Mail Center (HFZ-401)
Center for Devices and Radiological Health
Food and Drug Administration
9200 Corporate Boulevard
Rockville, Maryland 20850

Attention: Neurology Devices Branch

DISCLOSURE: FINANCIAL INTERESTS AND ARRANGEMENTS OF CLINICAL INVESTIGATOR (ATTACHMENT)

We hereby disclose that as a member of InterCure's Scientific Advisory Board (b)(4) [redacted]

To minimize any possible bias the study was double blinded; i.e. none of the clinical investigators, including (b) [redacted], knew whether a patient was in the treatment or the control group. Specifically, (b) [redacted] was not involved in the actual measurements of patients' blood pressure, which forms the basis for the primary endpoint. Instead, his study coordinator and/or nurse performed those [redacted] (b)(4)

Additionally, it should be noted that the grant of these share options is customary for InterCure Scientific Advisory Board members and was not done in conjunction with the clinical trial. In fact other SAB members who did not participate in the clinical trial have been granted such share option package with the same terms.

Sincerely,

Zohara Sadan
Director of Finance

InterCure Ltd. 9 Hamelacha st. Kislev building, Northern Industrial Area, Lod 71520, Israel.
voice: +972.8.9212126 . fax: +972.8.9204001

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

K020399 1/2

ATTACHMENT 9

510(k) Summary For The InterCure Ltd. RESPeRATE

Submitter's Name, Address, Telephone Number, and Contact Person

InterCure Ltd.
9 Hamelacha st. Kislev building
Northern Industrial area, Lod, 71520 Israel

Contact:	Dr. Benjamin Gavish Chief Scientist, InterCure Ltd.
Phone:	972-8-9212126
Facsimile:	972-8-9204001
Email:	bgavish@intercure.com

Date Prepared: January 2002

Name of the Device

RESPeRATE

Common or Usual Name

Biofeedback Device

Predicate Device

Respi-Low Model RL-108 (K000495) manufactured by InterCure Ltd.;

Intended Use

The RESPeRATE is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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K020399 2/2

Summary of the Basis for the Finding of Substantial Equivalence

The RESPeRATE is substantially equivalent to InterCure's previously cleared Respi-Low biofeedback device (K000495) for use in stress reduction and adjunctive treatment to reduce blood pressure. The device shares the same general intended use in relaxation and/or stress reduction and the same indications for use except for OTC use. Moreover, the principles of operation are identical to the predicate device and there are only minor differences in technological characteristics. Clinical testing in the OTC setting has shown that the RESPeRATE device can be properly used without the direction of a physician. This difference in the specific indications for use of the RESPeRATE (for OTC use) compared to the predicate (for prescription use), however, does not raise new questions of safety or efficacy and does not alter its therapeutic effect. Moreover, the clinical study demonstrated a safe, clinically significant, reduction in high blood pressure with use of the RESPeRATE over a period of 8 weeks without the guidance of a physician. Therefore, the devices are substantially equivalent.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENT 10

Premarket Notification
Truthful And Accuracy Statement

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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PREMARKET NOTIFICATION
TRUTHFUL AND ACCURACY STATEMENT
(As Required by 21 C.F.R. § 807.87(j))

I certify that, in my capacity as Chief Scientist of InterCure Ltd. I believe to the best of my knowledge, that all data and information submitted in this premarket notification for the RESPeRATE are truthful and accurate and that no material fact has been omitted.

02/03/02

Dr. Benjamin Gavish
Chief Scientist
InterCure Ltd.

Date

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

ATTACHMENT 11

Indications for Use

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

510(k) Number (if known): K020399

Device Name: **InterCure Ltd. RESPeRATE**

Indications for Use:

The RESPeRATE is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and/or non-pharmacological interventions.

(PLEASE DO NOT WRITE BELOW THIS LINE -- CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use ____ OR Over-The-Counter Use X

(Per 21 C.F.R. 801.109)
(*Optional Format 1-2-96*)

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENT 12

Confidentiality

InterCure considers its intent to market the RESPeRATE to be confidential commercial information. The company, therefore, requests that FDA not disclose the existence of this application until such time as final action on the submission is taken.

In addition, some of the materials in this application may be trade secret or confidential commercial or financial information within the meaning of 21 C.F.R. § 20.61 and therefore not disclosable under the Freedom of Information Act, even after the existence of the application becomes public. We ask that you consult with the company as provided in 21 C.F.R. § 20.45 before making any part of this submission publicly available.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENT 13

Submitter's name and address

Jonathan S. Kahan, Esq.
Hogan & Hartson L.L.P.
555 Thirteenth Street, N.W.
Washington, D.C. 20004

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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ATTACHMENT 14

Contact person's telephone and facsimile numbers

Jonathan S. Kahan, Esq.	OR	Dr. Benjamin Gavish	
Hogan & Hartson L.L.P.		InterCure Ltd.	
555 Thirteenth Street, N.W.		9 Hamelacha st. Kislev building	
Washington, DC 20004		Lod 71520, Israel	
Phone:	(202) 637-5794	Phone:	972-8-9212126
Facsimile:	(202) 637-5910	Facsimile:	972-8-9204001

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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June 24, 2002

Review of K020399/S1

Submitted by InterCure, Ltd.

Reviewed by Richard P. Felten, DGRND, GSDB

Richard P. Felten

This Premarket Notification was submitted by the company to obtain Over-the-Counter (OTC) marketing clearance for a device to be used at home to help a person perform deep breathing exercises as a means of reducing blood pressure. This device has the Trade Name "RESPeRATE" and is essentially identical to a similar device presently marketed by the company as a prescription device called Respi-Low.

The clinical data in this application was reviewed by Dr. John Stuhlmuller, Medical Officer, Cardiovascular Devices Branch. Dr. Stuhlmuller has also reviewed the proposed labeling and a video tape to be provided to the purchaser. Since this is to be sold as OTC the labeling was also reviewed by Mary Ann Wollerton in OHIP.

Following the initial review by Dr. Stuhlmuller, this application was placed on HOLD by telephone on May 3, 2002. The initial review had identified several issues regarding labeling/directions for use and these were discussed with Mr. Jonathan Kahan of Hogan & Hartson, official representative for InterCure. A FAX list of these issues was sent to Mr. Kahan. During the time required for the company to prepare responses to these initial issues, the OHIP review was performed by Ms. Wollerton and her issues were also provided to the company through Mr. Kahan.

This supplement contains the responses to the initial issues raised in our telephone conversation of May 3, 2002 as well as those issues in labeling identified by the OHIP review. These issues were also discussed with Mr. Kahan on June 12, 2002 following our FAX to Mr. Kahan on June 11, 2002 of the OHIP issues.

A FAX copy of the company's responses was received on June 19, 2002. This FAX does contain responses to all issues raised in the May 3, 2002 and June 11, 2002 Faxes. Company has agreed to most of the proposed changes or has modified the labeling information either in the directions for use or on the box itself to meet the issues raised in our review. These changes include:

1. Revision to their description of "Why the system works" to remove discussion of blood vessel toning and now discuss muscle relaxation. This change has been made in several locations where discussions on how the device works had been described.

2. Company has revised the box cover to clearly state that full directions for use must be read before use, have eliminated specific values for blood pressure

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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reduction, and have clearly stated that use of the RESPeRATE device is to be used under doctor's directions as part of a total regime for blood pressure reduction. This latter statement has also been included in the directions for use and has been emphasized by being placed in a black border box.

3. Company has simplified the statements on "How system works' by limiting this section to a discussion of how slow breathing causes relaxation which persists following cessation of the exercise.

4. Company has in several places clearly stated the need for at lease a total of 45 minutes of exercise per week to achieve the benefit and this has to be performed in at least 3 exercise sessions per week.

5. Company responded to questions regarding belt placement by pointing out this is based on the original 510(k) data, and the information on storage is based on the specifications provided by LCD manufacturer.

Company has provided rationale for not accepting 3 suggested changes. Regarding the idea of replacing the photographs in the Operator Manual with illustrations company has pointed out that the OTC test performed for this 510(k) used the manual with the photographs and the test results did demonstrate that users had no problem understanding the instructions, in fact there were no phone calls to the Help Desk in regards to this issue.

Regarding simplifying the medical terms used under Precautions, company has pointed out that these are the terms used by physicians and are recognized by patients and understood by patients. We agree with this response.

Regarding the issue of CE mark and specific regulations by country, company has clearly defined these by each country. This makes these statements clear and does not appear to be a cause of concern in their present format.

Company has made a revision to the operator manual regarding the Trouble Shooting section. This addition deals with static or noise in the ear phones and what could be possible causes of this noise.

Company has provided the required administrative documents including the stand alone Indications for Use page, a 510(k) Summary of Safety and Effectiveness, and the Truthful and Accurate Statement. The indications for use for this device is identical to that granted to the Respi-Low under K000405 with the exception that this indication does not mention prescription use. The indication for use statement does state that the device is to be used as part of a program of other pharmacological or non-pharmacological interventions.

Allowing this product to be sold over-the-counter does not present unacceptable risks to potential users. The device its self presents no risks directly associated with the way it

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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interacts with the user. The box cover and the directions for use clearly state that this product is to be used as part of an overall program for blood pressure reduction under the guidance of a physician. The directions go on to state that the use should be guide by a goal or reduction set by the persons' physician. The clinical data provided in this application as well as in the original study under K000405, has shown that routine use will have a benefit in lowering a persons' blood pressure.

Therefore, I recommend that the RESPeRATE biofeedback device be determine to be Substantially Equivalent to the presently marketed Respi-Low device both indicated for lowering blood pressure.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

Pre-market path: K020399
Name of the Device: RESPePARATE, InterCure
Review requested by ODE lead reviewer: Richard Felten
Date of DDUPSA receipt: 5/15/02
Date requested for re-review completion:
Review sent to ODE lead reviewer:
OHIP/DDUPSA reviewer: Mary Ann Wollerton
Date:

DDUPSA Approval: Branch Chief, Alvin W. Thomas Date 6/6/02
Deputy Division Director: MargaretT.Tolbert MT Date 6-7-02

The following comments are in response to your request to re-review the patient labeling of the RESPePARATE. The emphasis is on changing information provided so the intended patient and caregiver can better understand and use it. However, I encourage the applicant to test the patient information on a representative sample of prospective users to assure that they will be able to understand it.

Device Description and Intended Use

This device has been designed to lower blood pressure. RESPePARATE analyzes the patient's breathing rate and pattern, then interactively guides the patient through breathing exercises that lower breathing rate, slowly and effortlessly by prolonging exhalation. After each exercise, breathing returns to it's normal rate and pattern. The applicant recommends using the device three times or more a week for 15 minutes each session. The beneficial effects on blood pressure accumulate. Results can be expected within six to eight weeks.

The device has three components: the RESPePARATE device, an elastic belt with a respiration sensor, and headphones. The device is portable and battery-operated and about the size of a home blood pressure monitor.

The device is indicated for use only as an adjunctive treatment for high blood pressure, together with other pharmacological and other non-pharmacological interventions.

Patient Information

There is patient labeling included in this PMA and it is recommended so the patient is adequately informed about the device through appropriate labeling. It should be provided in plain English at a reading level that the average reader in the United States can understand it.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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RECOMMENDATIONS

GENERAL

When revising your patient labeling submission, you may wish to refer to FDA's Guidance on Medical Device Patient Labeling. You can find this document on our CDRH website:

http://www.fda.gov/cdrh/HumanFactors.html

I suggest that the applicant use the Guidance, and its related checklist provided in the Appendix of the Guidance, whenever applicable. Many researchers who have studied what works well for information delivery have recommended the order of information provided in the Guidance. The Guidance provides seven pages of references to substantiate the research that went into our recommendations for presentation and content.

SPECIFIC: RESPeRATE

For ease in reading, all the text should be presented in font size 12.

Proposed Labeling and Instruction Manual

I suggest the applicant add further explain in simple terms, how the device works.

Page 2

Is the following description containing the claim an accurate one? The RESPeRATE "alters the tone of the muscles that surround your small blood vessels. As it occurs, blood flows more easily through blood vessels. As a result, blood pressure is lowered."?

Page 4

The picture on this page and on subsequent pages should be much larger. For illustrative purposes, a non shaded and labeled drawing is preferred over a photograph. See Guidance Document, page 38, first paragraph.)

Page 9

There is no explanation of why the patient would want to change the duration of the exercise session. Please explain.

Page 10-11

The two tables are done well.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Page 13-14

I am unable to evaluate this table (Reports A, B, and C) without actually using the device. I assume that this table represents item numbers that are user friendly when accessed. Please explain how the patient can use the information to benefit his or her physical status. Is the goal to experience 45 minutes of total "effective exercise time?" Is it possible that the patient may use the device an hour or more to gain the required "effective exercise time?"

Page 16

Some information on this page is not appropriate for the patient. I recommend that the applicant delete the **Country Specific Market Clearance** and the **CE Statement**.

Page 17

Please define or simplify the following words:

Ischemic heart disease	unstable angina	chronic atrial fibrillation
Stroke/left with impairment	chronic renal failure	

Please write out and define COPD.

Getting Started Guide

This section appears to be abbreviated instructions for use. How will it be provided to the device user?

Packaging

1st page: I was unable to read the small print, so I was unable to evaluate the information provided. If this packaging is for the patient, it is totally unacceptable because it is unreadable. Anything meant for the user should be in font size 12 or larger.

4th page: This page contains the claim that "Clinical trials have shown that RESPeRATE significantly reduces blood pressure." The average indications provided on this page may not be understandable to most average readers. I recommend that the applicant give examples of the expected final blood pressure readings for each of the three categories if reduced. For instance, give an example of elevated blood pressure and calculate the possible reduction for:

all patients,
those with blood pressure 140/90, and
patients over 60.

Please provide the above information, as revised by the applicant, in the patient brochure.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

//

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5th page: **RESPeRATE TO LOWER BLOOD PRESSURE**
The short paragraph provided on this page is informative (e.g., optimal blood pressure reading) and could also be included in the text of the patient brochure.

6th page: Some of the information on this page could be provided in the text of the patient brochure, for example, that the device is lightweight and portable.

Call Center Representative Instructions:

I appreciate the inclusion of this information. I believe that it will be calming to the user to know that they can reach someone to get help with the device.

I believe that the next 4-5 pages should be deleted from the brochure for the patient. It is information for the Call Center Representative to use when analyzing the patient's use of the device.

Please provide a date of printing , so the reader will not how the current the information is.

Video Tape on Use of RESPeRATE

The five page script of this video was provided.

This video is easy to follow. There was one confusing part. The power on/off button is on the right. On page 4, the instructions say that the user can choose a different melody using this button on the right side of **RESPeRATE.** Is this the same button? It was unclear on the tape and in the script.

Will the script be provided to the patient? If so, there are a couple of typographical errors that should be corrected.

On page 3: "At this stage,....arrows that will guide you....."

"Whenever...., simply breathe regularly...."

The last paragraph informs that this device is an added (adjunctive) treatment for high blood pressure, use should be directed by a doctor, and is usually used with drugs and non-drug treatments to lower blood pressure. It is not a replacement for any treatment prescribed by your doctor. **This statement should be included in the patient brochure.**

#

Thank you for the opportunity to comment on the patient labeling of the RESPeRATE device. If I can be of further assistance in this review process, please contact me. I would appreciate receiving a copy of the final patient labeling and any comments you forward to the manufacturer.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

Felten, Richard P.

om: Stuhlmuller, John
ent: Wednesday, May 01, 2002 10:49 AM
To: Felten, Richard P.
Subject: K020399

Tab 1-IFU
- This section contains the labeling.
- My suggested revisions are contained on a separate "marked up" copy.

Tab 7-Clinical Report
- Background information is provided on the cardiovascular effects of slow breathing.
- Page 7 states the questions evaluated in the clinical study'
  Can patients operate the device appropriately with the available IFU without physician training?
  Does the use of RR under OTC conditions still reduce office BP?
- FDA provided informal review of the investigational plan addressing these questions prior to completion of the study.
- Two studies were completed.
- The first study enrolled (b patients in an open label registry. Purpose was to evaluate device function and whether users could properly interpret IFU and use device in correct manner.
- The second study randomized(b) as outlined in Figure 1. Purpose was to evaluate device function in a blinded manner without any expectation of clinical benefit.
- Results: Table 2 outlines device accountability. Table 3 indicates that (b)(4) randomized patients who received the device used it at least once. 95% of patients who used the device achieved slow breathing. Table 8 indicates that a non-statistically significant difference was seen in blood pressure between the treatment groups. Figure 2 illustrates the effect on blood pressure as a function of time of device use. Users with accumulated device use over 450 minutes in the 8 week study period had a significantly lower blood pressure than patients with (b)(4).

Summary
- Adequate scientific literature exist to support the physiological basis of slow breathing as part of the relaxation response in stress management.
- Stress management is an appropriate therapeutic intervention within the context of the multifactorial approach to treatment of hypertension.
- The study suggest that the OTC IFU is adequate to allow proper device use by hypertensive patients.
- Although the data is limited, regular use of the device with accumulated device use over 250 minutes in an 8 week period is associated with a clinically significant reduction in blood pressure.

John E. Stuhlmuller, M.D.
Medical Officer
FDA/CDRH/ODE/DCRD
301-443-8243 (ext. 155), 301-480-4204, jes@cdrh.fda.gov

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Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

Felten, Richard P.

om: Stuhlmuller, John
ent: Tuesday, May 21, 2002 4:30 PM
To: Felten, Richard P.
Subject: Instructional Video

Richard,

Looked at video. Overall it is okay. Disclaimer at the end is satisfactory. Only issue with the video is the following: video states that device needs to be used for at least 45 minutes over a week (7 days) to have a clinical effect. Issue that that we need to discuss further is whether additional information is needed regarding daily use. One time use for 45 minutes is not the same as 15 minutes a day on multiple days.

John

John E. Stuhlmuller, M.D.
Medical Officer
FDA/CDRH/ODE/DCRD
301-443-8243 (ext. 155), 301-480-4204, jes@cdrh.fda.gov

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REVISED:3/14/95

THE 510(K) DOCUMENTATION FORMS ARE AVAILABLE ON THE LAN UNDER 510(K) BOILERPLATES TITLED "DOCUMENTATION" AND MUST BE FILLED OUT WITH EVERY FINAL DECISION (SE, NSE, NOT A DEVICE, ETC.).

"SUBSTANTIAL EQUIVALENCE" (SE) DECISION MAKING DOCUMENTATION

K 020399

Reviewer: Richard P. Felton

Division/Branch: DGRND - GSDB

Device Name: RESPORATE

Product To Which Compared (510(K) Number If Known): Respitron K000405

	YES	NO	
1. Is Product A Device	X		If NO = Stop
2. Is Device Subject To 510(k)?	X		If NO = Stop
3. Same Indication Statement?	X		If YES = Go To 5
4. Do Differences Alter The Effect Or Raise New Issues of Safety Or Effectiveness?			If YES = Stop NE
5. Same Technological Characteristics?	X		If YES = Go To 7
6. Could The New Characteristics Affect Safety Or Effectiveness?			If YES = Go To 8
7. Descriptive Characteristics Precise Enough?	X		If NO = Go To 10 If YES = Stop SE
8. New Types Of Safety Or Effectiveness Questions?			If YES = Stop NE
9. Accepted Scientific Methods Exist?			If NO = Stop NE
10. Performance Data Available?			If NO = Request Data
11. Data Demonstrate Equivalence?			Final Decision:

Note: In addition to completing the form on the LAN, "yes" responses to questions 4, 6, 8, and 11, and every "no" response requires an explanation.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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DEPARTMENT OF HEALTH AND HUMAN SERVICES Public Health Service

Food and Drug Administration
Center for Devices and
Radiological Health
Office of Device Evaluation
Document Mail Center (HFZ-401)
9200 Corporate Blvd.
Rockville, Maryland 20850

May 10, 2002

INTERCURE LTD.
C/O HOGAN AND HARTSON L.L.P.
555 13TH STREET N.W.
WASHINGTON, DC 20004
ATTN: JONATHAN S. KAHAN

510(k) Number: K020399
Product: RESPERATE; MODEL RR-150

The additional information you have submitted has been received.

We will notify you when the processing of this submission has been completed or if any additional information is required. Please remember that all correspondence concerning your submission MUST be sent to the Document Mail Center (HFZ-401) at the above letterhead address. Correspondence sent to any address other than the one above will not be considered as part of your official premarket notification submission. Also, please note the new Blue Book Memorandum regarding Fax and E-mail Policy entitled, "Fax and E-Mail Communication with Industry about Premarket Files Under Review. Please refer to this guidance for information on current fax and e-mail practices at www.fda.gov/cdrh.ode/A02-01.html.

The Safe Medical Devices Act of 1990, signed on November 28, states that you may not place this device into commercial distribution until you receive a letter from FDA allowing you to do so. As in the past, we intend to complete our review as quickly as possible. Generally we do so 90 days. However, the complexity of a submission or a requirement for additional information may occasionally cause the review to extend beyond 90 days. Thus, if you have not received a written decision or been contacted within 90 days of our receipt date you may want to check with FDA to determine the status of your submission.

If you have procedural or policy questions, please contact the Division of Small Manufacturers International and Consumer Assistance (DSMICA) at (301) 443-6597 or at their toll-free number (800) 638-2041, or contact me at (301) 594-1190.

Sincerely yours,

Marjorie Shulman
Supervisory Consumer Safety Officer
Premarket Notification Section
Office of Device Evaluation
Center for Devices and
Radiological Health

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

HOGAN & HARTSON

L.L.P.

JONATHAN S. KAHAN
PARTNER
(202) 637-5794
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June 19, 2002

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BY HAND DELIVERY

510(k) Document Mail Center (HFZ-401)
Center for Devices and Radiological Health
Food and Drug Administration
9200 Corporate Boulevard
Rockville, Maryland 20850

Attention: Richard Felten, General Surgery Devices Branch (HFZ-410)

Re: Amendment – 510(k) Premarket Notification for InterCure Ltd.'s RESP*e*RATE Biofeedback Device (K020399)

Dear Mr. Felten:

On behalf of our client, InterCure Ltd. ("InterCure" or "the company"), we hereby submit additional information relating to InterCure's 510(k) premarket notification for its RESP*e*RATE Biofeedback Device ("RESP*e*RATE") (K020399). The information provided in this amendment is in response to FDA's requests for additional information conveyed to the company by Richard Felten via facsimile on May 3, 2002 and June 11, 2002 and as discussed during a teleconference on June 12, 2002. The information contained herein was provided by InterCure to Hogan & Hartson L.L.P. for submission to the Food and Drug Administration ("FDA" or "the agency") and InterCure is solely responsible for the accuracy and completeness of this submission.

For clarity, each of FDA's requests is restated below, followed in each case by the company's response. Where revised language is provided, the existing language has been redlined for ease of review.

I. MAY 2, 2002 REQUEST FOR ADDITIONAL INFORMATION

<u>Item One</u>: It is felt that the information placed on the box should conform to the same information contained in the Operator Manual. The Getting Started guide has a section titled Ten Steps to Lower Blood Pressure, yet the box cover gives only 4 steps under a section titled Easy to Use.

Questions? Contact FDA/CDRH/OSEI/DIBD/CDRH-FOI STATUS@fda.hhs.gov or 301-796-8118

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Response One: The back panel of the box has been revised to state the following and include a note to refer to the User's Manual for more detail:

Easy to Use

RESPeRATE ~~Four easy steps.~~is pleasant and easy to use

- ~~1.~~ Strap the sensor and belt over your clothes
- ~~2.~~ Turn on the device
- ~~3.~~ Breathe normally
- ~~4.~~ Listen and follow the musical tones that guide the breathing exercises.

The large keypad and display allow you to easily adjust volume, select melody and see exercise results.

Please read the enclosed training materials

***Item Two**: Similarly, the box cover in the same location has brief descriptions of What is RESPeRATE, How RESPeRATE Works, and Why RESPeRATE Works. These should also be consistent with language used in similar sections of the operator manual.*

Response Two: The box and the User's Manual have been revised to be consistent, except that the information contained on the box provides less detail than the User's Manual. The User's Manual introduction will be revised to include the following:

What is RESPeRATE

RESPeRATE is the only non-drug medical device clinically proven to lower blood pressure.

The **RESPeRATE** unit has three components: the **RESPeRATE** device, elastic belt with respiration sensor and comfortable headphones. **RESPeRATE** is portable, battery-operated and about the size of a home blood pressure monitor.

How Does it Work

RESPeRATE analyzes your breathing rate and pattern, then interactively guides you through breathing exercises that lower breathing rate, slowly and effortlessly, by prolonging exhalation. After each exercise, your breathing returns to ~~it's~~its normal rate and pattern; however the beneficial effects on blood pressure accumulate.

Why Does it Work

RESPeRATE's breathing exercises ~~beneficially alter both heart rate and tone of the~~reduce neural sympathetic activity and relax the muscles that surround your small

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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blood vessels ~~in the human body~~. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure.

The back panel of the box will be revised to state the following:

What is RESPeRATE

RESPeRATE is the only non-drug medical device clinically proven to lower blood pressure. It provides a new option for lowering blood pressure, which may be used safely along with medication or other lifestyle modifications such as diet and exercise.

How Does it Work

RESPeRATE analyzes your breathing rate and pattern, then interactively guides you through ~~then creates customized musical tones to guide an individual~~ breathing exercises that reduce your ~~lower breathing that lower~~ breathing rate, slowly and effortlessly, by prolonging exhalation. After each exercise, your breathing returns to its normal rate and pattern ~~lower breathing that lower~~; however the beneficial effects on blood pressure accumulate.

Why Does it Work

RESPeRATE's breathing exercises ~~beneficially alter both heart rate and tone of the~~reduce neural sympathetic activity and relax the muscles that surround your small blood vessels ~~in the human body~~. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure.

Item Three: In the Introduction paragraph we suggest that in the second paragraph, second line, the sentence should read "These breathing exercises may be enhanced by individualized coaching.

Response Three: The third paragraph to the Introduction to the User's Manual on page 1 will be revised as follows:

Scientific evidence has shown that breathing exercises, when performed routinely, can lower blood pressure. These breathing exercises are ~~virtually impossible~~difficult to perform without continuous, individualized coaching. Using a patented technology, **RESPeRATE** provides this coaching in an extremely effective way.

Item Four: We recommend that pages 2 and 3 be rewritten to include a brief discussion of the concept of lifestyle modifications and that there should be a better link between these pages and the Instructions for Use on page 17. It is felt that there should be some statement of specific indication for use being granted the device in this section so the user right off understands that use of the RESPeRATE is part of a total package of care designed to lower blood pressure and this includes modifications to lifestyle, maybe medication, and/or other changes.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Response Four: The Introduction contained on pages 1 and 2 will be revised to state the following:

Introduction

Congratulation! **RESPeRATE** To Lower Blood Pressure, will help you take an active step toward improved treatment of your high blood pressure. Please read this User's Manual carefully and completely. It includes everything you need to know to help you maximize the benefits of using **RESPeRATE** To Lower Blood Pressure.

Please note: **RESPeRATE** should only be used as part of your overall health program for achieving goal blood pressure, as recommended by your doctor. **RESPeRATE** can be safely used in conjunction with medication and lifestyle modification such as diet and exercise.

Scientific evidence has shown that breathing exercises, when performed routinely, can lower blood pressure. These breathing exercises are ~~virtually impossible~~difficult to perform without continuous, individualized coaching. Using a patented technology, **RESPeRATE** provides this coaching in an extremely effective way.

RESPeRATE guides you to slow down your rate of respiration while prolonging the exhalation. **RESPeRATE** will lead you to breath at a rate of 10 breaths per minute or less. We call this "Effective Exercise Time".

To achieve best results, it is recommended that you use **RESPeRATE** for at least 45 minutes of Effective Exercise Time per week -- preferably in 15 minute daily sessions. As with other exercises, you should expect to see notable results within approximately six to eight weeks.

What is optimal blood pressure?

Optimal blood pressure is 120/80 mmHg. High blood pressure puts you at increased risk for stroke, heart attack, and other life threatening disorders.

What is RESPeRATE

RESPeRATE is the only non-drug medical device clinically proven to lower blood pressure.

The **RESPeRATE** unit has three components: the **RESPeRATE** device, elastic belt with respiration sensor and comfortable headphones. **RESPeRATE** is portable, battery-operated and about the size of a home blood pressure monitor.

How Does it Work

RESPeRATE analyzes your breathing rate and pattern, then interactively guides you through breathing exercises that lower breathing rate, slowly and effortlessly, by prolonging exhalation. After each exercise, your breathing returns to ~~it's~~its normal rate and pattern; however the beneficial effects on blood pressure accumulate.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Why Does it Work

RESPeRATE's breathing exercises ~~beneficially alter both heart rate and tone of the~~reduce neural sympathetic activity and relax the muscles that surround your small blood vessels ~~in the human body~~. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure.

Item Five: *We believe the section under Why does* **RESPeRATE** *Work should be deleted since there is not data supporting this discussion of toning muscles. It would be OK to include here a discussion similar to that contained in section 1.4 of the application in section 7 which discusses breathing exercises (pages 4 and 5 of Section 7).*

Response Five: The section entitled "Why Does it Work" on page 2 of the User's Manual has been revised to be more consistent with section 1.4 in plain language for the user as follows:

Why Does it Work

RESPeRATE's breathing exercises ~~beneficially alter both heart rate and tone of the~~reduce neural sympathetic activity and relax the muscles that surround your small blood vessels ~~in the human body~~. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure.

Item Six: *Page 4 has information of correct placement of belt. Is this based on actual clinical trial data? Was this looked at as part of the original clinical study for the prescription clearance or is this based on experience subsequent to marketing?*

Response Six: The instruction on the correct placement of belt was included in the original User's Manual used during the clinical trial and the resulting data was analyzed at table 3 on page 18 of the original 510(k) submission.

Item Seven: *Page 15 Cleaning and Maintenance, the 4th bullet has temperature information for where the device can be placed. What is the basis for this recommendation, especially the lower temperature of –* [redacted] (b)(4) [redacted]

Response Seven: The lower temperature range for storage of the device of (b)(4) or (b)(4) is based upon the storage specifications for the various components of the device – specifically, the LCD display.

Item Eight: *I would suggest using K # on page 16 since this is the document granting OTC.*

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Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Response Eight: As requested by FDA, page 16 will be revised to indicate that the country specific clearance in the United States is pursuant to 510(k) number K020399, as well as K000405.

Item Nine: *Page 17, Precautions, think this should be placed in a black box and this should also appear on the box itself as part of the caution that this device is intended to be used as part of a planned reduction in blood pressure.*

Response Nine: The top part of the precautions (the "please note") on page 17 of the User's Manual will be boxed in and the precautions appear in the following manner in the User's Manual:

> Please note: **RESPeRATE** should only be used as part of your overall health program for achieving goal blood pressure, as recommended by your doctor. **RESPeRATE** can be safely used in conjunction with medication and lifestyle modification such as diet and exercise.

Precautions

Do not use this device without consulting your physician if you suffer or have suffered in the past from: Active ischemic heart disease/unstable angina, severe congestive heart failure, chronic atrial fibrillation, stroke resulting in permanent ~~left with~~ impairment, chronic renal failure, severe asthma, chronic obstructive pulmonary disease (COPD) like chronic bronchitis and emphysema, or major organ failure.

InterCure strongly recommends that you do not modify your hypertension treatments without the advice and consent of your physician.

Do not use your **RESPeRATE** when you need to be alert or to concentrate, or when using heavy equipment. Do not use **RESPeRATE** while driving.

If you experience any side effects or if you feel any change in your general health or mood, immediately discontinue use of your **RESPeRATE**, and contact your physician.

Breathe naturally throughout the exercise. Excessive deep breathing may cause dizziness and palpitations.

On the product package, the prescription labeling will be replaced with the boxed note as follows:

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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> ~~Caution: Federal law restricts the RESPerATE device to sale by or on the oder of a physician~~
> Please note: **RESPeRATE** should only be used as part of your overall health program for achieving goal blood pressure, as recommended by your doctor. **RESPeRATE** can be safely used in conjunction with medication and lifestyle modification such as diet and exercise.

Item Ten: *The section which has the Ten Steps to Lower Blood Pressure, we recommend that this read Ten Steps to Using RESPeRATE.*

Response Ten: The card included in the User's Manual entitled *Getting Started Guide* includes a section on the back entitled T*en Steps to Lower Blood Pressure*, which will be retitled *Ten Steps to Using RESPeRATE.*

Item Eleven: *Regarding the box, there is a place where data is presented on average reduction. Is this based on the clinical study supporting this 510(k) or is it from some other source? Also, it would be better to use figure 2 from page 27 of section 7 to show effects and make the statement that data is based on a 250 minute use over 8 weeks which is the real basis for this clearance.*

Response Eleven: Specific information regarding clinical results will be modified as follows:

> Clinical trials have shown that RESPeRATE significantly reduces blood pressure without any side effects. For best results, use for 15 minutes at least three or four times per week. ~~Average reductions are:~~
>
> - ~~12/6 mmHg for all individuals~~
> - ~~15/9 for individuals with initial blood pressure greater than 140/90 mmHg~~
> - ~~17/11 mmHg for individuals 60 years of age or older~~

II. JUNE 11, 2002 REQUEST FOR ADDITIONAL INFORMATION

Item Twelve: *(user manual general) I suggest the applicant add further explanation in simple terms as to how the device works.*

Response Twelve: As explained in the Response to Item Two, the information under the headings "How Does It Work" and "Why Does it Work" have been revised to state "**How Does It Work** - RESP*e*RATE analyzes your breathing rate and pattern, then interactively guides you through breathing exercises that lower breathing rate, slowly and effortlessly, by prolonging exhalation. After each exercise, your breathing returns to its normal rate and pattern; however the beneficial effects

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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on blood pressure accumulate." and "**Why Does it Work** - -RESPeRATE's breathing exercises reduce neural sympathetic activity and relax the muscles that surround your small blood vessels. Over time, these effects allow blood to flow more easily through your blood vessels, resulting in sustained lower blood pressure, respectively."

Item Thirteen: *(user manual page 2) Is the following description containing the claim and accurate one? The RESPeRATE "alters the tone of the muscles that surround your small blood vessels. As it occurs, blood flows more easily through blood vessels. As a result, blood pressure is lowered."?*

Response Thirteen: The description that using the RESPeRATE alters muscle tone surrounding small blood vessels is accurate and has been expanded to explain that the RESPeRATE reduces neural sympathetic activity and relaxes muscles that surround small blood vessels. In addition, as explained in the Response to Item Five, the information under the Heading, "Why Does it Work," has been revised to be consistent with the description in section 1.4 of the 510(k) submission.

Item Fourteen: *(user manual page 4) The picture on this page and the subsequent pages should be much larger. For illustrative purposes, a non-shaded and labeled drawing is preferred over a photograph. See Guidance Document, page 38, first paragraph.)*

Response Fourteen: The photographs provided on page 4 of the User's Manual provide clear images to accompany the narrative instructions. The instructions for using the device have been validated during an OTC trial and in marketing of the prescription device, in which the instructions are identical. During actual use, InterCure has received minimal questions to help desk, none of which were related to these specific instructions. Therefore, the instructions will not be modified.

Item Fifteen: *(user manual page 9) These is no explanation of why the patient would want to change the duration of the exercise session. Please explain.*

Response Fifteen: Patients may wish to modify the duration of an exercise session for reasons unrelated to their therapy (*e.g.*, time constraints). Thus, further information regarding reasons a patient may wish to modify the duration of an exercise session will not be provided. However, page 9 of the User's Manual will be revised to state:

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Changing the Duration of Your Current Exercise Session

If you would like to extend or shorten the duration of the current exercise session

1. **Press the Exercise time ...**

Changing the Duration of Your Default Exercise Session

If you would like to extend or shorten the duration of the default exercise session

Item Sixteen: *(user manual page 13-14) I'm unable to evaluate this table (report A, B and C) without actually using the device. I assume that this table represents item numbers that are user friendly when accessed. Please explain how the patient can use the information to benefit his or her physical status. Is the goal to experience 45 minutes of total "effective exercise time?" Is possible that the patient may use the device an hour or more to gain the required "effective exercise time?"*

Response Sixteen: The numbers presented in the tables on pages 13 and 14 are user friendly when accessed. The Item Numbers are displayed on the screen and each number corresponds to the information in the "Reports On" column.

Each exercise session is to consist of 15 minute sessions with a goal of accumulating at least 45 minutes of effective exercise time per week. The theme of "goal" is carried throughout the manual, as it has proven to be a very effective concept with consumers. Indeed, the OTC study demonstrated that blood pressure reduction is directly correlated with accumulated effective exercise time.

Item Seventeen: *(user manual page 16) Some information on this page is not appropriate for the patient. I recommend that the applicant delete the country specific market clearance and CE statement.*

Response Seventeen: As explained in the Response to Item Eight, page 16 has been revised to include the current K number for marketing clearances. In order to facilitate international labeling, the CE statement, Israeli Ministry of Health No. 408196 237-0000, and a mention of CE mark have been included on page 16. The CE statement on page 16 of the User's Manual will be revised to state:

Country Specific Market Clearance
United States: 510(k) number K020399, as well as K000405
Israel: Ministry of Health # 408/96 237-0000
European Union: CE marking

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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CE Statement
The RESPeRATE has a CE marking

Manufacturer Authorized Representative in Europe:
MEDES Ltd.
2 Upper Station Road, Radlett, Herts London WD78BX, UK
tel/fax: +44 (0) 1923859810
email: medes@arazygroup.com
~~**RESPeRATE** fulfills the provisions of the EC Directive 93/42/EEC (Medical Device Directive). **RESPeRATE** is designed according to the European standard EN 60601-1. **RESPeRATE** is classified according to clause 5 of the European standard EN 60601-1: Internally powered equipment; protection against electrical shock: type BF; protection against harmful ingress of water: ordinary; need only cleaning; resperate is not suitable for use in the presence of a flammable anaesthetic mixture with air, or with oxygen or nitrous oxide; operation: continuous.~~

Item Eighteen: *(user manual page 17) Please define or simplify the following words: Ischemic heart disease, unstable angina, chronic atrial fibrillation, Stroke/left with impairment, chronic renal failure. Please write out and define COPD*

Response Eighteen: As discussed with Mr. Felten on June 12, 2002, the conditions included in the precautions accurately describe common conditions using terminology that is routinely used in medicine. The User's Manual suggests that the user consult his or her physician if the patient suffers or has suffered from any of the listed conditions. Further clarification in the User's Manual may in fact create greater user confusion without participation by the patient's physician.

The term COPD will be spelled out and clarified. The paragraph will now read:

> Do not use this device without consulting your physician if you suffer or have suffered in the past from: Active ischemic heart disease/unstable angina, severe congestive heart failure, chronic atrial fibrillation, stroke resulting in permanent ~~left with~~ impairment, chronic renal failure, severe asthma, chronic obstructive pulmonary disease (COPD) like chronic bronchitis and emphysema, or major organ failure.

Item Nineteen: *(Getting started guide) This section appears to be abbreviated instruction for use. How will it be provided to the device user*

Response Nineteen: This "Getting Started Guide" will be provided to the user as a supplemental card to the full User's Manual. As indicated in the Response to Item Ten, the "Getting Started Guide" will be renamed to "Ten Steps to Using RESPeRATE."

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Item Twenty: *(Packaging page 1?) Unable to read fonts on page 1. Suggest to use fonts larger then #12*

Response Twenty: All fonts, with the exception of the technical information, are 12 point font or larger.

Item Twenty-One: *(Packaging page 4?) This page contains the claim that "clinical trials have shown that RESPeRATE significantly reduces blood pressure." The average indications provided on this page may not be understandable to most average readers. I recommend that the applicant give examples of the expected final blood pressure readings for each of the three categories if reduced. For instance, give an example of elevated blood pressure and calculate the possible reduction of all patients; those with blood pressure 140/90, and patients over 60.*

- **Response Twenty-One:** As indicated in the Response to Item Eleven, the entire reference to specific reductions have been deleted from the box and is replaced with a general statement about significant blood pressure reduction, "Clinical trials have shown that RESPeRATE significantly reduces blood pressure without any side effects. For best results use for 15 minutes at least three or four times per week."

Item Twenty-Two: *(Packaging page 5?) RESPeRATE TO LOWER BLOOD PRESSURE. The short paragraph provided on this page is informative (e.g., optimal blood pressure reading) and could also be included in the text of the patient brochure.*

Response Twenty-Two: As indicated in the Response to Item Four the introduction of the User's Manual will include the text as follows:

> **What is optimal blood pressure?**
>
> Optimal blood pressure is 120/80 mmHg. High blood pressure puts you at increased risk for stroke, heart attack, and other life threatening disorders.

Item Twenty-Three: *(Packaging page 6?) some of the information on this page could be provided in the text of the patient brochure, for example, that the device is lightweight and portable.*

Response Twenty-Three: The relevant information from page 6 of the packaging, which adds to the consumer knowledge, has already been integrated throughout the user manual.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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Item Twenty- Four: *(Video tape on RESPeRATE) The video was easy to follow. There was one confusing part. The power on/of button is on the right. On page 4, the instructions say that the user can choose a different melody using this button on the right side of RESPeRATE. Is this the same button? It was unclear on the tape and in the script? Will the script be provided to the patient?*

*The last paragraph informs that this device is an added (adjunctive) treatment for high blood pressure, use should be directed by a doctor and is usually used with drugs and non-drug treatments to lower blood pressure. ....**This statement should be included in the patient brochure.***

Response Twenty-Four: The video script will not be provided to patients and was submitted to FDA facilitate the review process only. The last section of the video, which consists of written text that is read by a voice-over, "that this device is an added (adjunctive) treatment for high blood pressure, use should be directed by a doctor and is usually used with drugs and non-drug treatments to lower blood pressure," is only relevant for the prescription indication. The video will be revised to replace this section of the video with a text message of the following paragraph from the user manual with no voice-over:

> Please note: **RESPeRATE** should only be used as part of your overall health program for achieving goal blood pressure, as recommended by your doctor. **RESPeRATE** can be safely used in conjunction with medication and lifestyle modification such as diet and exercise.

LABELING CHANGES INITIATED BY INTERCURE

In addition to the revisions to the labeling suggested by FDA's requests for additional information, InterCure will make the following revisions to pages 4-5 and page 11 of the User's Manual, respectively.

(pages 4-5)

~~**4. Loosen any tight clothing to ensure you breath easily**~~

7. Plug in and put on the headphones.
Plug headphones into the RESPeRATE device headphone port located on the right side of device, marked with the (icon) icon. You should hear a click when the headphones are fully inserted into the port.

(page 11) [add to trouble shooting table]

Static noise heard through headphones	Headphones not fully plugged into RESPeRATE port	Plug headphones full into device.

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	Electronic communication device (such as cell phone, bi-directional beeper, or other wireless communication device) is operating within 5 feet of RESPeRATE	Do not use such communication device within 5 feet of RESPeRATE while conducting your exercise session

* * *

If you have any additional questions or concerns regarding this submission please contact me at the above number. Upon a finding of substantial equivalence please fax a copy of the notification letter to us at (202)-637-5910.

Sincerely,

Jonathan Kahan

Jonathan S. Kahan

Attachments

ccs: Paul Sheils, InterCure USA
Erez Gavish, InterCure Ltd.
Gerard J. Prud'homme, Esq.
Jodi K. Scott, Esq.
Joseph K. Canner, Regulatory Affairs Specialist

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

DEPARTMENT OF HEALTH & HUMAN SERVICES — Public Health Service
Food and Drug Administration

Memorandum

From: Reviewer(s) - Name(s) Richard P. Felten

Subject: 510(k) Number K020399/S1

To: The Record - It is my recommendation that the subject 510(k) Notification:

- ☐ Refused to accept.
- ☐ Requires additional information (other than refuse to accept).
- ☒ Is substantially equivalent to marketed devices.
- ☐ NOT substantially equivalent to marketed devices.
  - De Novo Classification Candidate? ☐ YES ☐ NO
- ☐ Other (e.g., exempt by regulation, not a device, duplicate, etc.)

Is this device subject to Postmarket Surveillance?	☐ YES	☒ NO
Is this device subject to the Tracking Regulation?	☐ YES	☒ NO
Was clinical data necessary to support the review of this 510(k)?	☒ YES	☐ NO
Is this a prescription device?	☐ YES	☒ NO
Was this 510(k) reviewed by a Third Party?	☐ YES	☒ NO
Special 510(k)?	☐ YES	☒ NO
Abbreviated 510(k)? Please fill out form on H Drive 510k/boilers	☐ YES	☒ NO

This 510(k) contains:

Truthful and Accurate Statement ☐ Requested ☒ Enclosed
(required for originals received 3-14-95 and after)

☒ A 510(k) summary OR ☐ A 510(k) statement

☐ The required certification and summary for class III devices

☒ The indication for use form (required for originals received 1-1-96 and after)

Animal Tissue Source ☐ YES ☒ NO

The submitter requests under 21 CFR 807.95 (doesn't apply for SEs):

☐ No Confidentiality ☐ Confidentiality for 90 days ☐ Continued Confidentiality exceeding 90 days

Predicate Product Code with class: 79 HCC / Class 2

Additional Product Code(s) with panel (optional):

Review: [signature] (Branch Chief) G-SDB (Branch Code) 6/26/02 (Date)

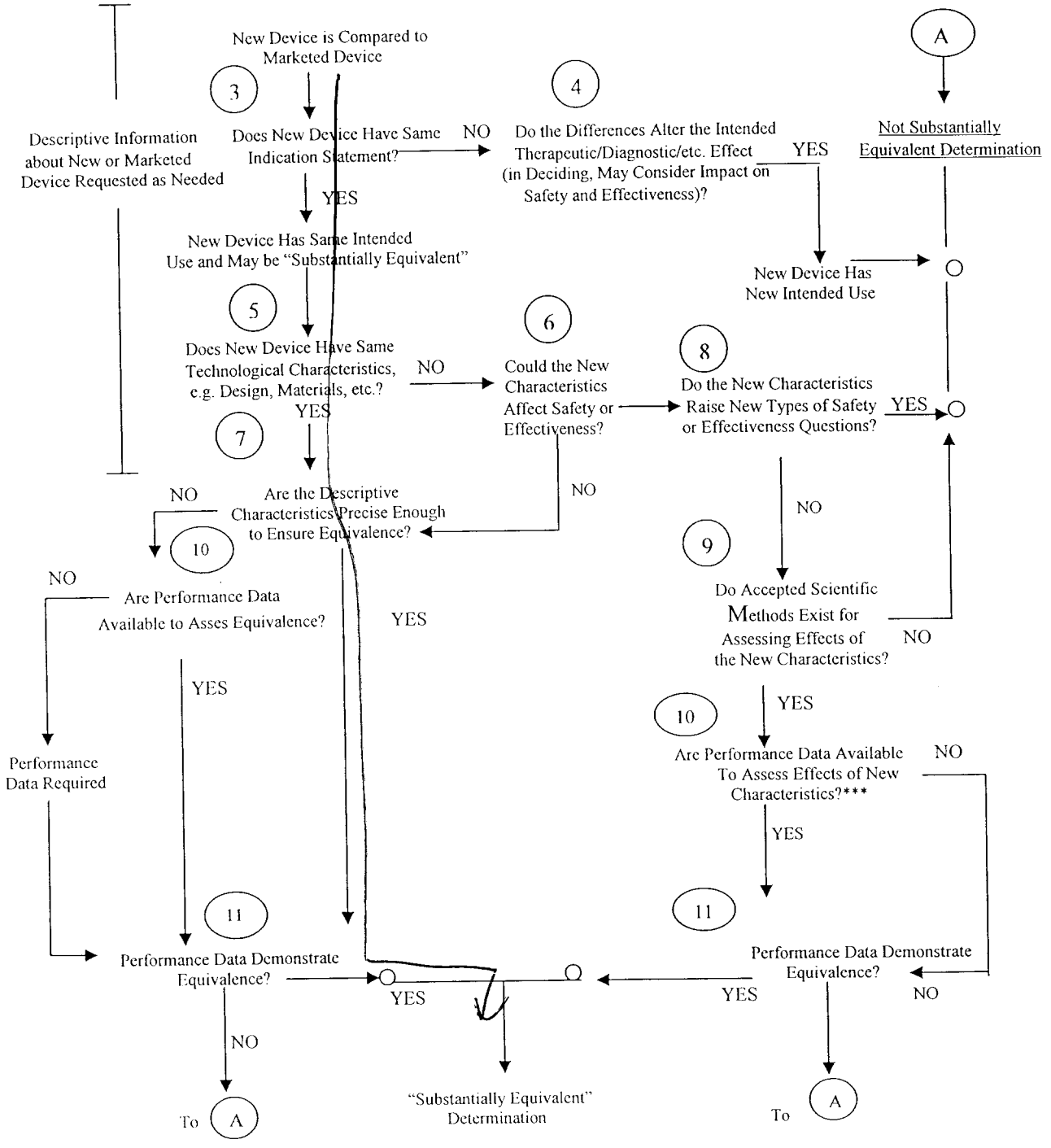
Final Review: [signature] (Division Director) 7/2/02 (Date)

Revised: 8/17//99

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

510(k) "SUBSTANTIAL EQUIVALENCE" DECISION-MAKING PROCESS



- 510(k) Submissions compare new devices to marketed devices. FDA requests additional information if the relationship between marketed and "predicate" (pre-Amendments or reclassified post-Amendments) devices is unclear.
- This decision is normally based on descriptive information alone, but limited testing information is sometimes required.
- Data maybe in the 510(k), other 510(k)s, the Center's classification files, or the literature.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

K020399/S1

HOGAN & HARTSON

L.L.P.

JONATHAN S. KAHAN
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May 9, 2002

BY HAND DELIVERY

510(k) Document Mail Center (HFZ-401)
Center for Devices and Radiological Health
Food and Drug Administration
9200 Corporate Boulevard
Rockville, Maryland 20850

RECEIVED
MAY 9 2 03 PM '02
FDA/CDRH/OCE/DMC

Attention: Richard Felten, General Surgery Devices Branch (HFZ-410)

Re: Amendment – 510(k) Premarket Notification for InterCure Ltd.'s RESP*e*RATE Biofeedback Device (K020399)

Dear Mr. Felten:

On behalf of our client, InterCure Ltd. ("InterCure" or "the company"), we hereby submit additional information relating to InterCure's 510(k) premarket notification for its RESPeRATE Biofeedback Device ("RESPeRATE") (K020399). The information contained herein was provided by InterCure to Hogan & Hartson for submission to the Food and Drug Administration ("FDA") and InterCure is solely responsible for the accuracy and completeness of this submission.

On April 22, 2002, we submitted the RESPeRATE box and the introduction page of the User Manual. As we understand that you are conducting a thorough review of the labeling, we have provided for your review two copies of the video that was used during the clinical study and will be included with the device. For your convenience, we have also provided a copy of the video transcript (**Attachment 1** and **floppy disk**).

SK 41

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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If you have any additional questions or concerns regarding this submission please contact me at the above number. Upon a finding of substantial equivalence please fax a copy of the notification letter to us at (202)-637-5910.

Sincerely,

Jonathan S. Kahan

Attachments

ccs: Paul Sheils, InterCure USA
Erez Gavish, InterCure Ltd.
Gerard J. Prud'homme, Esq.
Jodi K. Scott, Esq.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

English Narration for RESPeRATE alpha Version 2

[Opening part 1 – alpha only]

Thank you for purchasing RESPeRATE FOR LOWER BLOOD PRESSURE

RESPeRATE is simple and easy to use. This is a device you use at home for only 10 to 15 minutes per day and has been demonstrated to reduce high blood pressure as an adjunctive treatment **with no side effects**.

The RESPeRATE automatically recognizes your individual breathing patterns with a belt-like respiration sensor and a miniature processing unit.

The device "guides" you to modify your breathing patterns. Following the session your breathing returns to its initial pattern, but the beneficial effect accumulates. Within a few weeks of regular use, RESPeRATE can lower your blood pressure.

Your personal goals with RESPeRATE FOR LOWER BLOOD PRESSURE are to log at least 45 minutes of Effective Exercise each week with the RESPeRATE

If at any time, you have any difficulty operating the devices, consult your enclosed user manuals or call the toll-free number for technical support.

During the next few minutes, you will receive important instructions on the proper operation of RESPeRATE You can stop the step-by-step review, whenever you like, to try out what you've learned.

[Pause, freeze and title text "Preparations"]

Before using RESPeRATE for the first time, install four double A batteries. Make sure you insert them according to the markings.

Carefully, remove the elastic rubber belt and sensor from its storage compartment.

Loosen your belt and any other tight clothing or accessories that might interfere with easy breathing.

Now, attach the sensor:

- Place the belt around your upper abdomen so that the buckle is on your side.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

- Now, position the belt and sensor unit over the area where your individual breathing movement occurs and adjust the belt until it fits snugly.
- Most men tend to breathe from the diaphragm. Most women tend to breathe from the upper chest.
  It may take you several attempts to identify the area from which you breathe.
- It is important to make sure the belt is not twisted. Make sure you are wearing the belt horizontally and not diagonally.

[Pause, freeze and title text "Operation"]

Plug the headphones into the marked socket on the right side of RESPeRATE, and put on the headphones.

Press the On/Off button, located on the right side of RESPeRATE.

The initial display shows your total Effective Exercise Time over the last seven days. We will explain effective exercise later.

Now, breathe normally.

A flashing dot will accompany your breathing on the display and will apear each time you breath in.

There is no need to breath unusually deeply or slowly. Simply allow RESPeRATE to "recognize" your normal breathing pattern.

Each well-analyzed breath is displayed as a vertical line and by a short tone.

After four breaths have been recognized, RESPeRATE will automatically advance to the Interactive Breathing stage.

The Interactive Breathing stage begins when your breathing rate is displayed on the screen.

From here on, it's up to you.

RESPeRATE composes a musical pattern similar to your personal breathing pattern, **but** slightly slower.

RESPeRATE guides you to slower breathing by extending your exhale part of your breathing and **YOU** have to follow the music.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

In, out, in, out, out, out. [Out - speak softly; recorded few times]

At this stage, the figure will be accompanied by arrows that will guides you with the inhale note and the exhale note within the music. *[Make sure it's sync with the picture]*

After one minute, the figure with the arrows will disappear, so you wont be distracted.

From now on, there is no need to look at the screen.
Just sit back, close your eyes, and breathe according to the musical pattern. There is no need for especially deep or slow breathing.

Whenever you feel that the musical pattern is too slow for you, making it difficult to follow, simply breath regularly in the way that is most comfortable for you.
Within half a minute, RESPeRATE will automatically adjust the music pattern upward towards your breathing rate. Then it will re-initiate the slowing-down process based on your current breathing rate.

The Effective Exercise, breathing below 10 breaths per minute, is accumulated over the course of your last seven days of use. Your goal is to build up at least 45 minutes of effective exercise per week.

At the end of the session, RESPeRATE will gradually lower its volume. After a few seconds, it will automatically shut itself off.

[Freeze and title text "Troubleshooting"]

If RESPeRATE does not recognize your breathing, no lines will be displayed, instead an icon will appear indicating that you should re-position the sensor. Check again to make sure that the sensor unit moves freely. If necessary, reposition the sensor.

The loose belt icon means you have to tighten the belt a little.

If you tighten the belt too much, another icon will ask you to loosen it a bit.

Now let us briefly review some additional features of RESPeRATE.

You can adjust the volume by pressing the up or down buttons during operation. The volume level will be displayed on the screen for a few seconds.

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

You can choose a different melody using this button on the right side of RESPeRATE. Pressing once will display the current melody number.
Use the up or down buttons to scroll through the various melodies.

You can use the clock button to change the duration of your current RESPeRATE session.
Press once to display the time remaining in the current session.
Use the up or down buttons to scroll until you reach the preferred duration. The default duration of the session is set at 15 minutes.
To modify this default, please refer to the User Manual enclosed in your package

Press this button, to check how many minutes of Effective Exercise you have logged in this session.

RESPeRATE is also equipped with a statistical Report function, enabling you to assess the quality of previous sessions.

To reach the statistical menu, Switch on RESPeRATE. During the "recognition" stage, press the button on the left side marked with stat. RESPeRATE's screen will display menu number one, which indicates the number of times the device has been used.

Use the up or down buttons to scroll through the various statistical menus.
For detailed information about the menus please refer to the User Manual.

In order to turn off the statistical function, press the on/off button.

After you've completed your daily session, remember to return the sensor to its compartment and place the headphones around the unit.

[Closing–alpha]

Thank you again for purchasing RESPeRATE TO LOWER BLOOD PRESSURE.

And we hope you find RESPeRATE pleasant and easy to use.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

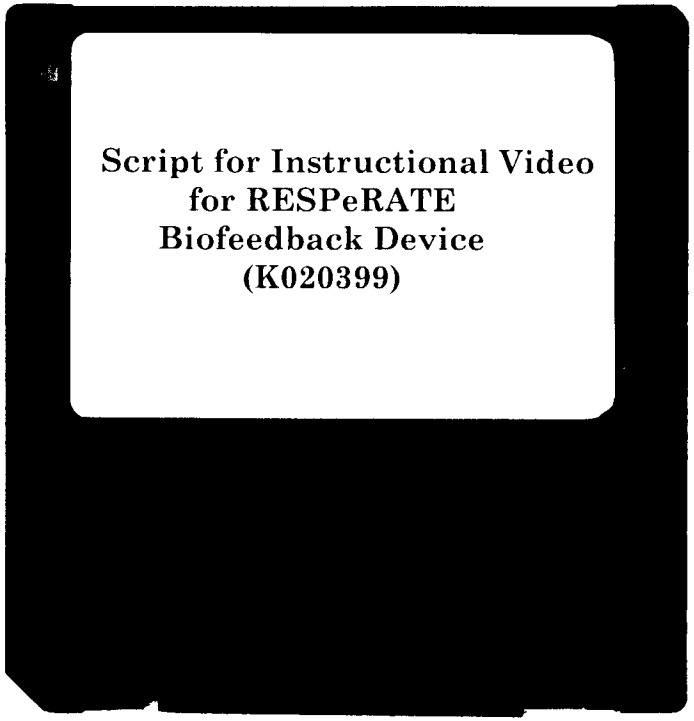
RESPeRATE to Lower Blood Pressure… because the risk is too high and life is too short. [Dramatic ending]

[Warning in text– Clinical + alpha]

RESPeRATE is intended for use as a relaxation treatment for the reduction of stress by leading the user through interactively guided and monitored breathing exercises. The device is indicated for use only as an adjunctive treatment for high blood pressure under the direction of a physician, together with other pharmacological and/or non-pharmacological interventions as prescribed. Using RESPeRATE is not intended to replace or modify any treatment for hypertension as prescribed by your physician.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016



Floppy Disk – RESP*e*RATE Biofeedback Device (K

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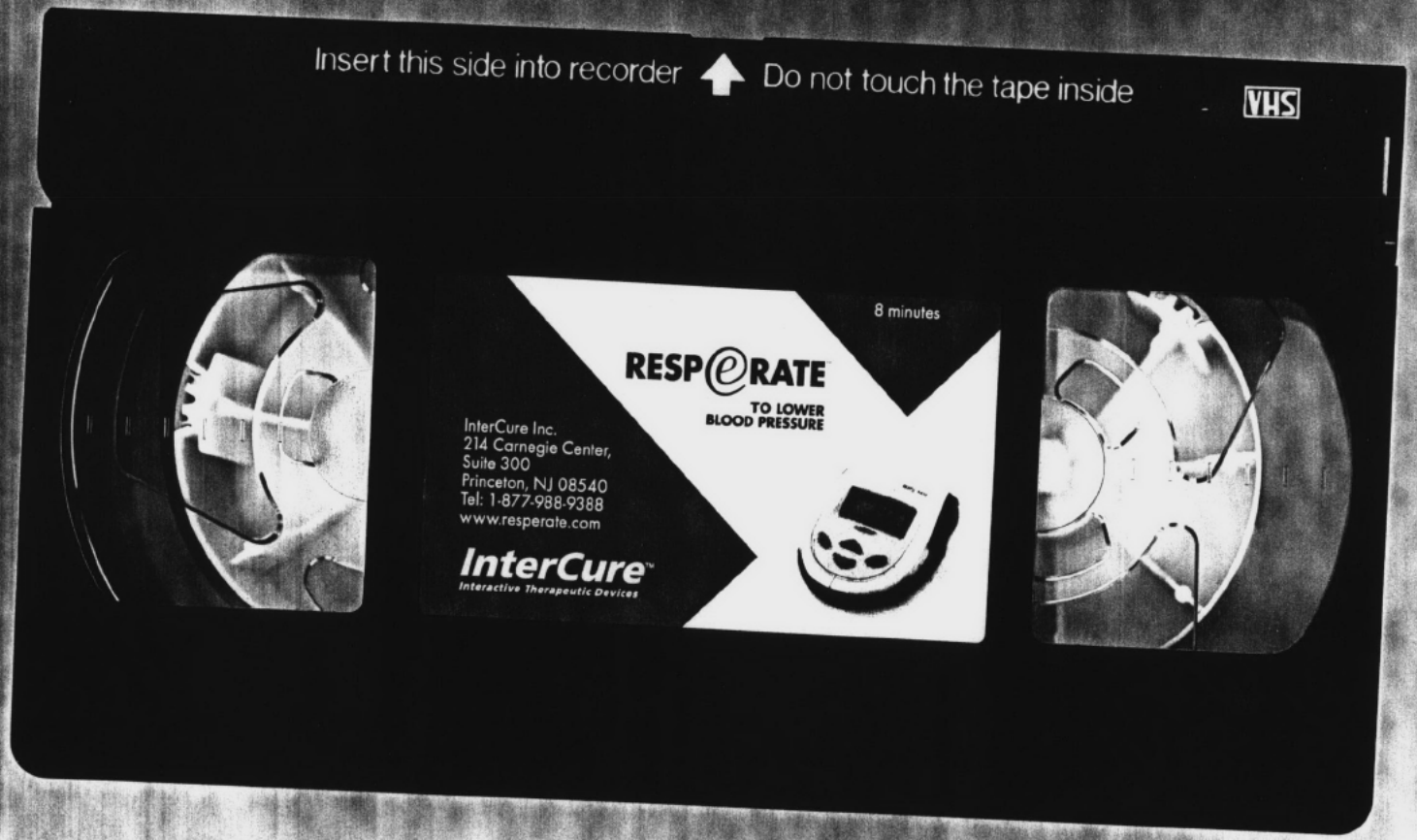
Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016



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Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

DEPARTMENT OF HEALTH AND HUMAN SERVICES Public Health Service

Food and Drug Administration
Center for Devices and
Radiological Health
Office of Device Evaluation
Document Mail Center (HFZ-401)
9200 Corporate Blvd.
Rockville, Maryland 20850

May 03, 2002

INTERCURE LTD.
C/O HOGAN AND HARTSON L.L.P.
555 13TH STREET N.W.
WASHINGTON, DC 20004
ATTN: JONATHAN S. KAHAN

510(k) Number: K020399
Product: RESPERATE; MODEL RR-150

We are holding your above-referenced Premarket Notification (510(k)) for 30 days pending receipt of the additional information that was requested by the Office of Device Evaluation. Please remember that all correspondence concerning your submission MUST cite your 510(k) number and be sent in duplicate to the Document Mail Center (HFZ-401) at the above letterhead address. Correspondence sent to any address other than the one above will not be considered as part of your official premarket notification submission. Also, please note the new Blue Book Memorandum regarding Fax and E-mail Policy entitled, "Fax and E-Mail Communication with Industry about Premarket Files Under Review. Please refer to this guidance for information on current fax and e-mail practices at www.fda.gov/cdrh.ode/A02-01.html.

The deficiencies identified represent the issues that we believe need to be resolved before our review of your 510(k) submission can be successfully completed. In developing the deficiencies, we carefully considered the statutory criteria as defined in Section 513(i) of the Federal Food, Drug, and Cosmetic Act for determining substantial equivalence of your device. We also considered the burden that may be incurred in your attempt to respond to the deficiencies. We believe that we have considered the least burdensome approach to resolving these issues. If, however, you believe that information is being requested that is not relevant to the regulatory decision or that there is a less burdensome way to resolve the issues, you should follow the procedures outlined in the "A Suggested Approach to Resolving Least Burdensome Issues" document. It is available on our Center web page at: http://www.fda.gov/cdrh/modact/leastburdensome.html

If after 30 days the requested information, or a request for an extension of time, is not received, we will discontinue review of your submission and proceed to delete your file from our review system. Pursuant to 21 CFR 20.29, a copy of your 510(k) submission will remain in the Office of Device Evaluation. If you then wish to resubmit this 510(k) notification, a new number will be assigned and your submission will be considered a new premarket notification submission.

Please remember that the Safe Medical Devices Act of 1990 states that you may not place this device into commercial distribution until you receive a decision letter from FDA allowing you to do so.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

If you have procedural or policy questions, please contact the Division of Small Manufacturers International and Consumer Assistance (DSMICA) at (301) 443-6597 or at their toll-free number (800) 638-2041, or contact me at (301) 594-1190.

Sincerely yours,

Marjorie Shulman
Supervisor Consumer Safety Officer
Premarket Notification Section
Office of Device Evaluation
Center for Devices and
Radiological Health

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Food and Drug Administration

Memorandum

From: Reviewer(s) - Name(s) Richard P. Felten

Subject: 510(k) Number K020399

To: The Record - It is my recommendation that the subject 510(k) Notification:

- ☐ Refused to accept.
- ☒ Requires additional information (other than refuse to accept). Telephone HOLD 5-3-02
- ☐ Is substantially equivalent to marketed devices.
- ☐ NOT substantially equivalent to marketed devices.
  - De Novo Classification Candidate? ☐ YES ☐ NO
- ☐ Other (e.g., exempt by regulation, not a device, duplicate, etc.)

Is this device subject to Postmarket Surveillance?	☐ YES	☐ NO
Is this device subject to the Tracking Regulation?	☐ YES	☐ NO
Was clinical data necessary to support the review of this 510(k)?	☐ YES	☐ NO
Is this a prescription device?	☐ YES	☐ NO
Was this 510(k) reviewed by a Third Party?	☐ YES	☐ NO
Special 510(k)?	☐ YES	☐ NO
Abbreviated 510(k)? Please fill out form on H Drive 510k/boilers	☐ YES	☐ NO

This 510(k) contains:

Truthful and Accurate Statement ☐ Requested ☐ Enclosed
(required for originals received 3-14-95 and after)

☐ A 510(k) summary OR ☐ A 510(k) statement

☐ The required certification and summary for class III devices

☐ The indication for use form (required for originals received 1-1-96 and after)

Material of Biological Origin ☐ YES ☒ NO

The submitter requests under 21 CFR 807.95 (doesn't apply for SEs):

☐ No Confidentiality ☐ Confidentiality for 90 days ☐ Continued Confidentiality exceeding 90 days

Predicate Product Code with class: Additional Product Code(s) with panel (optional):

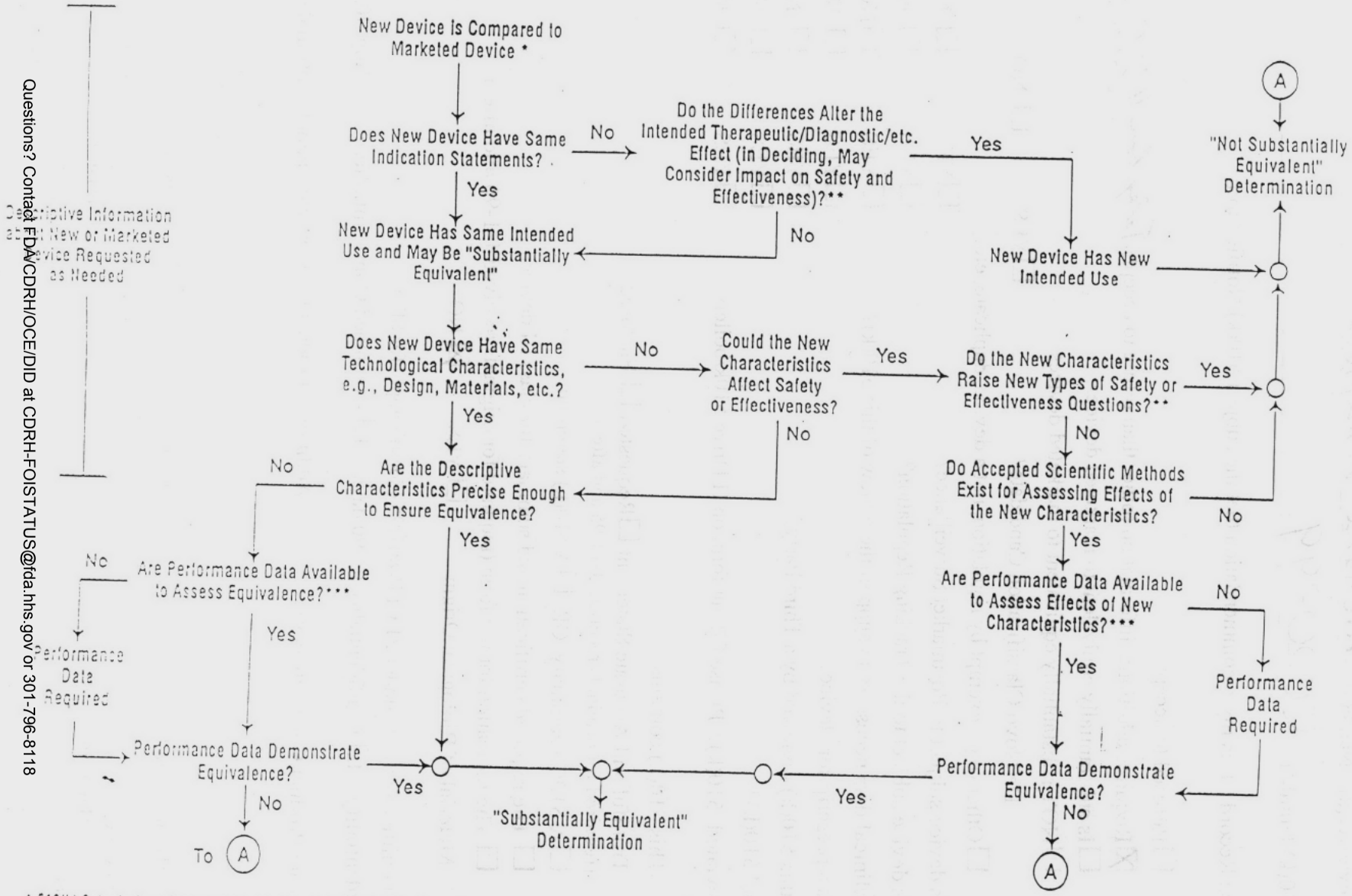
Review:
(Branch Chief) (Branch Code) (Date)

Final Review:
(Division Director) (Date)

Revised:8/17//99

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

510(k) "Substantial Equivalence" Decision-Making Process (Detailed)



* 510(k) Submissions Compare New Devices to Marketed Devices. FDA Requests Additional Information if the Relationship Between Marketed and "Predicate" (Pre-Amendments or Reclassified Post-Amendments) Devices is Unclear.

** This Decision is Normally Based on Descriptive Information Alone, But Limited Testing Information is Sometimes Required.

*** Data May Be in the 510(k), Other 510(k)s, The Center's Classification Files, or the Literature.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

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Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

May 3, 2002

Review of K020399

Submitted by InterCure Ltd.

Reviewed by Richard P. Felten, DGRND, GSDB

Richard P. Felten

This Premarket Notification is a marketing clearance request for a device to be used at home to help a person perform deep breathing exercises as a means of reducing blood pressure. The device has been given the Trade Name " RESPeRATE Biofeedback Device".

The device is essentially identical to a previously cleared prescription device called the Respi-Low device. The Respi-Low device was cleared under K000405 as a prescription device for lower blood pressure by helping a person develop deep breathing. The devices employ a breathing rate monitor which is placed on the chest. The device has a musical feedback program which adjusts the music as a person approaches and reaches the desired rate of 10 breaths per minute. Once the rate is reached the music remains constant and if the rate increases the musical feedback reverts to an earlier pattern.

The original device, the Respi-Low as cleared for marketing based on a clinical trial comparing it to standard Walkman music use. This application is also supported by clinical data showing that an individual can use the RESPeRATE device without needing formal instructions. Patients were provided the device at home without prior training. Successful reduction of blood pressure was compared between these subjects and others who had been asked to participate in a trial and were required to take blood pressure measurements twice a day. At end of 8 weeks it was found that users of the RESPeRATE device who used the device more than 250 minutes over the 8 week trial did demonstrate reduction in blood pressure compared to taking your blood pressure only and also compare to RESPeRATE users who used the device for a less amount of time over the 8 week period.

This application has been reviewed by Dr. John Stuhlmuller, Cardiovascular Devices Branch and he has concurred that the data does support that users can follow the written directions successfully. He has also emphasized the need for use, that is, that minimal success requires the 250 minute use per 8 weeks. Dr. Stuhlmuller has reviewed the directions for use and has made a number of recommendations for changes. These include a better interlinking between the actual directions for use section and introductory remarks regarding usefulness of the device; suggestions that a stronger statement on need for at least 250 minutes of use per 8 weeks be included, and concern that information provided on the box does not conform adequately to the same section/information contained in the operator manual.

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

Since this is to be an over-the-counter (OTC) product, it is necessary for the operator manual to also be reviewed by OHIP. The manual has been forwarded to this office for review.

On May 3, 2002 a telephone conversation was held with Mr. Jonathan Kahan, Hogan & Hartson, official representative for InterCure concerning this application. Mr. Kahan was informed that the application was being placed on HOLD to allow company opportunity to address the labeling concerns and to allow for OHIP review. It was agreed that a listing of the specific issues with page number would be sent to Mr. Kahan during the week of May 6, 2002 so these could be forwarded to company.

I recommend that this application be placed on HOLD.

O.K.
Neil

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

Records processed under FOIA request #2014-9336 Released by CDRH on 3/31/2016

Felten, Richard P.

ɔm: Stuhlmuller, John
ıt: Wednesday, May 01, 2002 10:49 AM
ı o: Felten, Richard P.
Subject: K020399

Tab 1-IFU

- This section contains the labeling.
- My suggested revisions are contained on a separate "marked up" copy.

Tab 7-Clinical Report

- Background information is provided on the cardiovascular effects of slow breathing.
- Page 7 states the questions evaluated in the clinical study'
  Can patients operate the device appropriately with the available IFU without physician training?
  Does the use of RR under OTC conditions still reduce office BP?
- FDA provided informal review of the investigational plan addressing these questions prior to completion of the study.
- Two studies were completed.
- The first study enrolled (b) patients in an open label registry. Purpose was to evaluate device function and whether users could properly interpret IFU and use device in correct manner.
- The second study randomized (b) as outlined in Figure 1. Purpose was to evaluate device function in a blinded manner without any expectation of clinical benefit.
- Results: Table 2 outlines device accountability. Table 3 indicates that (b)(4) randomized patients who received the device used it at least once. 95% of patients who used the device achieved slow breathing. Table 8 indicates that a non-statistically significant difference was seen in blood pressure between the treatment groups. Figure 2 illustrates the effect on blood pressure as a function of time of device use. Users with accumulated device use over 450 minutes in the 8 week study period had a significantly lower blood pressure than patients with 250-450 and <150 minutes.

Summary

- Adequate scientific literature exist to support the physiological basis of slow breathing as part of the relaxation response in stress management.
- Stress management is an appropriate therapeutic intervention within the context of the multifactorial approach to treatment of hypertension.
- The study suggest that the OTC IFU is adequate to allow proper device use by hypertensive patients.
- Although the data is limited, regular use of the device with accumulated device use over 250 minutes in an 8 week period is associated with a clinically significant reduction in blood pressure.

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May 3, 2002

Specific Issues Regarding Labeling

1. It is felt that the information placed on the box should conform to the same information contained in the Operator Manual. The Getting Started guide has a section titled Ten Steps to Lower Blood Pressure, yet the box cover gives only 4 steps under a section titled Easy to Use.

2. Similarly, the box cover in the same location has brief descriptions of What is RESPeRATE, How RESPeRATE Works, and Why RESPeRATE Works. These should also be consistent with language used in similar sections of the operator manual.

3. In the Introduction paragraph we suggest that in the second paragraph, second line, the sentence should read "These breathing exercises may be enhanced by individualized coaching.

4. We recommend that page 2 and 3 be rewritten to include a brief discussion of the concept of life style modifications and that there should be a better link between these pages and the Instructions for Use on page 17. It is felt that there should be some statement of the specific indication for use being granted the device in this section so the user right off understands that use of the RESPeRATE is part of a total package of care designed to lower blood pressure and this include modifications to life style, maybe medication, and/or other changes.

5. We believe the section under Why does RESPeRATE Work should be deleted since there is not data supporting this discussion of toning muscles. It would be OK to include here discussion similar to that contained in section 1.4 of the application in section 7 which discusses breathing exercises (pages 4 and 5 of Section 7).

6. Page 4 has information of correct placement of belt. Is this based on actual clinical trial data? Was this looked at as part of the original clinical study for the prescription clearance or is this based on experience subsequent to marketing?

7. Page 15 Cleaning and Maintenance, the 4th bullet has temperature information for where device can be placed. What is the basis for this recommendation, especially the lower temperature of (b) [redacted]?

8. I would suggest using this K # on page 16 since this is the document granting OTC

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9. Page 17, Precautions, think this should be placed in a black box and this should also appear on the box itself as part of the caution that this device is intended to be used as part of a planned reduction in blood pressure.

10. The section which has the Ten Steps to Lower Blood Pressure we recommend that this read Ten Steps Using RESPeRATE.

11. Regarding box, there is a place where data is presented on average reduction. Is this based on the clinical study supporting this 510(k) or is it from some other source? Also, it would be better to use figure 2 from page 27 of section 7 to show effects and make the statement that data is based on a 250 minute use over 8 weeks which is the real basis for this clearance.

As I mentioned this is also being reviewed by OHIP and expect additional comments regarding the Operator Manual and possibly the box. I'll get these to you as quickly as possible once I get a response.

Richard Felten

Richard P. Felten

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118

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SCREENING CHECKLIST
FOR ALL PREMARKET NOTIFICATION [510(k)] SUBMISSIONS

510(k) Number: K020399

The cover letter clearly identifies the type of 510(k) submission as (Check the appropriate box):

☐ Special 510(k) - Do Sections 1 and 2

☐ Abbreviated 510(k) - Do Sections 1, 3 and 4

☒ Traditional 510(k) or no identification provided - Do Sections 1 and 4

Section 1: Required Elements for All Types of 510(k) submissions:

	Present	Inadequate or Missing
Cover letter, containing the elements listed on page 3-2 of the Premarket Notification [510)] Manual.	✓	
Table of Contents.	✓	
Truthful and Accurate Statement.	✓	
Device's Trade Name, Device's Classification Name and Establishment Registration Number.	✓	
Device Classification Regulation Number and Regulatory Status (Class I, Class II, Class III or Unclassified).	✓	
Proposed Labeling including the material listed on page 3-4 of the Premarket Notification [510)] Manual.	✓	
Statement of Indications for Use that is on a separate page in the premarket submission.	✓	
Substantial Equivalence Comparison, including comparisons of the new device with the predicate in areas that are listed on page 3-4 of the Premarket Notification [510)] Manual.	✓	
510(k) Summary or 510(k) Statement.	✓	
Description of the device (or modification of the device) including diagrams, engineering drawings, photographs or service manuals.	✓	
Identification of legally marketed predicate device. *	✓	
Compliance with performance standards. * [See Section 514 of the Act and 21 CFR 807.87 (d).]	✓	
Class III Certification and Summary. **	N/A	
Financial Certification or Disclosure Statement for 510(k) notifications with a clinical study. * [See 21 CFR 807.87 (i)]	✓	
510(k) Kit Certification ***	N/A	

* - May not be applicable for Special 510(k)s.
** - Required for Class III devices, only.
*** - See pages 3-12 and 3-13 in the Premarket Notification [510)] Manual and the Convenience Kits Interim Regulatory Guidance.

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Section 4: Additional Requirements for ABBREVIATED and TRADITIONAL 510(k) submissions (If Applicable):

	Present	Inadequate or Missing
a) Biocompatibility data for all patient-contacting materials, OR certification of identical material/formulation:	N/A	
b) Sterilization and expiration dating information:	N/A	
i) sterilization process		
ii) validation method of sterilization process		
iii) SAL		
iv) packaging		
v) specify pyrogen free		
vi) ETO residues		
vii) radiation dose		
c) Software Documentation:	N/A	

Items with checks in the "Present but Deficient" column require additional information from the sponsor. Items with checks in the " Missing" column must be submitted before substantive review of the document.

Passed Screening ✓ Yes ____ No
Reviewer: Richard Fleck
Concurrence by Review Branch: _____

Date: Feb 25, 2002

The deficiencies identified above represent the issues that we believe need to be resolved before our review of your 510(k) submission can be successfully completed. In developing the deficiencies, we carefully considered the statutory criteria as defined in Section 513(i) of the Federal Food, Drug, and Cosmetic Act for determining substantial equivalence of your device. We also considered the burden that may be incurred in your attempt to respond to the deficiencies. We believe that we have considered the least burdensome approach to resolving these issues. If, however, you believe that information is being requested that is not relevant to the regulatory decision or that there is a less burdensome way to resolve the issues, you should follow the procedures outlined in the "A Suggested Approach to Resolving Least Burdensome Issues" document. It is available on our Center web page at: http://www.fda.gov/cdrh/modact/leastburdensome.html

Questions? Contact FDA/CDRH/OCE/DID at CDRH-FOISTATUS@fda.hhs.gov or 301-796-8118