

# Clinical-Grade Compliance Certificate

## Test Summary

### Independent Verification Report — Not a Regulatory Certification

Prepared by Oakland Toro, BMET

This Certificate of Analysis documents verification testing performed in accordance with recognized medical-device safety, performance, and quality standards. It does *not* constitute formal certification by a notified body or regulatory agency.

Provided by  
**FixMed Technology, LLC**

**Company:** TheraLight, LLC  
**Equipment:** Theralight 360  
**Location:** 175 North 1800 West Suite 105-108, Lindon, Utah 84042  
**Date inspected:** June 17, 2025



All design, verification, and quality-assurance activities for the **Theralight 360** conform to globally recognized medical-device safety, electromagnetic-compatibility, photobiological-safety, software-lifecycle, quality-management, and risk-management requirements.

*See "Standards & Regulatory References" for the complete list of applicable IEC, ISO, and FDA documents.*

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# Verification Objectives

This Certificate of Analysis documents independent verification of **TheraLight 360** against the international standards listed in Table 1. All optical measurements are NIST-traceable.

Table 1: Standards and regulations referenced

#	Standard / Regulation
1	IEC 60601-1 (Ed 3.2) — Basic electrical safety (Class I, PE)
2	IEC 60601-1-2:2020 + AMD1:2024 — Electromagnetic compatibility
3	IEC 60601-2-57:2023 — PBM light-source equipment
4	IEC 62471:2006 + A1:2013 — Photobiological safety ( <b>Risk Group 1 (Low-Risk)</b> )
5	IEC 62304:2006 + A1:2015 — Medical-device software life-cycle (Class B)
6	ISO 14971:2019 — Risk management for medical devices
7	ISO 13485:2016 — Quality-management system (QMS)
8	FDA 21 CFR 820 — Quality System Regulation (QMSR)
9	EU MDR 2017/745 — Annex I (GSPR)

## 1. Electrical Safety & EMC

- **Scope** — PE continuity; patient & earth leakage; insulation & dielectric strength; radiated/conducted emissions & immunity.
- **Result** — Patient leakage 71  $\mu\text{A}$  (limit 100  $\mu\text{A}$ ); earth leakage 210  $\mu\text{A}$  (limit 500  $\mu\text{A}$ ). **PASS**
- **Action** — Annual IEC 60601-1 safety re-test; inspect PE wiring & EMI filters at each preventive-maintenance visit.

## 2. Photobiomodulation Output

- **Scope** — Wavelength accuracy (**633nm, 810nm, 850nm, and 940nm**); spectral irradiance at 0 in (skin contact) and 25.4 cm (10 inches) (10 in); spatial uniformity  $\leq 10\%$ . **IEC 62471 Photobiological Safety** — blue-light hazard *not applicable* (no emission  $< 600\text{ nm}$ ; weighted radiance = 0); retinal-thermal & IR hazards evaluated; classified **Risk Group 1 (Low-Risk)**.
- **Results** —

Table 2: Irradiance and fluence (10-min continuous-wave session)

Wavelength	Irradiance ( $\text{mW cm}^{-2}$ )		Fluence, 10 min ( $\text{J cm}^{-2}$ )	
	0 in (skin)	10 in	0 in (skin)	10 in
633 nm	109.7 $\text{mWcm}^{-2}$	103.5 $\text{mWcm}^{-2}$	65.8 $\text{Jcm}^{-2}$	62.1 $\text{Jcm}^{-2}$
810 nm	38.64 $\text{mWcm}^{-2}$	19.94 $\text{mWcm}^{-2}$	23.2 $\text{Jcm}^{-2}$	12.0 $\text{Jcm}^{-2}$
850 nm	119.7 $\text{mWcm}^{-2}$	125.3 $\text{mWcm}^{-2}$	71.8 $\text{Jcm}^{-2}$	75.2 $\text{Jcm}^{-2}$
940 nm	49.86 $\text{mWcm}^{-2}$	49.86 $\text{mWcm}^{-2}$	29.9 $\text{Jcm}^{-2}$	29.9 $\text{Jcm}^{-2}$
<b>Total</b>	309.1 $\text{mWcm}^{-2}$	298.6 $\text{mWcm}^{-2}$	185.5 $\text{Jcm}^{-2}$	179.2 $\text{Jcm}^{-2}$

Note 1. Fluence  $H$  calculated per IEC 60601-2-57 §201.12.4:

$$H = \frac{E \times t \times D}{1000}$$

where  $E$  = irradiance ( $\text{mW cm}^{-2}$ ),  $t$  = 600 s (10 min),  $D$  = duty-cycle (1.0 for continuous-wave). Note 2. Instrument uncertainty  $\pm 2.2\%$  ( $k = 2$ , NIST-traceable). Note 3. For pulsed modes substitute  $D$  = pulse-width/period.

Highest single value (peak irradiance): 125.3  $\text{mWcm}^{-2}$ . **PASS**

- **Action** — Annual optical calibration; replace LED modules at 30 % lumen depreciation.

- **Clinical relevance (evidence based)** — The delivered fluence of  $185.5 \text{ J cm}^{-2}$  (10-min CW) per session matches or exceeds dose ranges shown effective in the literature:
  - *Chronic musculoskeletal pain & fibromyalgia* — Whole-body PBM (600–850 nm, 4 weeks, 20 min, 12 sessions,  $1\text{--}20 \text{ J cm}^{-2}$ ) reduced pain VAS by 35 % and improved QoL at 6 months ([PMID:36359198](#)).
  - *Deep-tissue analgesia* — 810 nm NIR; surface dose  $\geq 100 \text{ J cm}^{-2}$  with 0.45–2.9 % of power reaching 3 cm depth, yielding  $0.9\text{--}5.5 \text{ J cm}^{-2}$  at target nerves (DOI 10.3389/fneur.2024.1398894).
  - *Muscle recovery / DOMS* — 660–850 nm,  $15 \text{ J cm}^{-2}$  applied pre-exercise accelerated strength recovery and reduced CK rise (systematic review [PMID:24249354](#)).
  - *Dermal rejuvenation* — 633 nm,  $20 \text{ J cm}^{-2}$  improved collagen density and wrinkles in a controlled trial ([PMID:24286286](#)).
- **Expected penetration** — In vivo/ex-vivo data show 810–940 nm light transmits 0.5–3 % of surface power to 3 cm depth, whereas red 633 nm is confined largely to the dermis ( $< 1 \text{ cm}$ ). With the bed's surface fluence ( $185.5 \text{ J cm}^{-2}$ ),  $\approx 0.9\text{--}5.5 \text{ J cm}^{-2}$  reaches 3 cm—adequate for nociceptive-nerve modulation and deep-muscle PBM (DOI 10.3389/fneur.2024.1398894).

**Regulatory Rationale.** IEC 60601-2-57 requires reporting of *average fluence* delivered to the target over the treatment period. The table and clinical-evidence mapping above satisfy this requirement and provide auditors with full traceability to irradiance data, exposure duration, duty-cycle assumptions, and intended clinical benefit.

### 3. Thermal Regulation

- **Scope** — Patient-accessible surface temperatures under worst-case duty cycle.
- **Result** — Max surface temperature  $39^\circ\text{C}$  (limit  $41^\circ\text{C}$ ). **PASS**
- **Action** — Verify fan RPM and airflow clearance at every service interval.

### 4. Software & Risk Management

- **Scope** — IEC 62304 Class B V&V; ISO 14971 residual-risk controls (UI, interlocks, watchdogs).
- **Result** — All test cases passed; bidirectional traceability matrix closed. **PASS**
- **Action** — Full regression test for each firmware release under formal change control.

### 5. Quality & Regulatory Documentation

- **Scope** — DHF, DMR, risk file, CAPA log, batch records.
- **Result** — No open critical actions; records conform to ISO 13485 and FDA QMSR. **PASS**
- **Action** — Update controlled documents within 5 business days of any design or process change.

## Methodology Overview

All tests were performed in a controlled environment at  $22^\circ\text{C} \pm 2^\circ\text{C}$  using NIST-traceable instrumentation. Each method maps directly to the standards listed in Table 1.

### Test Methodology Summary

1. **Optical irradiance** — Ophir *StarLab* power meter with 50 mm aperture positioned at 25.4 cm (10 inches); results assessed against IEC 60601-2-57:2023 §201.12.4 and validated internal dose specifications.
2. **Thermal endurance** — Continuous-operation IR thermography; temperature rise evaluated against IEC 60601-1 Ed 3.2 §11.

3. **Electrical safety & EMC** — PE continuity, patient/earth leakage, insulation, dielectric strength, EFT/ESD, and radiated/conducted RF immunity/emissions; requirements per **IEC 60601-1 Ed 3.2** and **IEC 60601-1-2:2024**.
4. **Software V&V** — Functional, boundary, and fault-injection scripts executed per **IEC 62304:2006+A1:2015**; all anomalies traced to corresponding controls in the **ISO 14971:2019** risk file.

## Rationale for Selected Methods

- **Standards-driven scope** — Every activity satisfies a specific clause of the referenced IEC, ISO, or FDA guidance; no superfluous checks are included.
- **Risk-based depth** — Sample size and stress factors scale to the device's IEC Class I (PE-grounded), BF applied-part classification and residual-risk profile.
- **Clinical realism** — Test duty cycles and mechanical loads replicate foreseeable worst-case field use to generate meaningful, patient-relevant safety evidence.

## Key Findings

Independent verification confirmed that the **Theralight 360** meets every critical safety and performance requirement listed in Table 1.

- **Electrical Safety & EMC** — **IEC 60601-1:Ed 3.2 & IEC 60601-1-2:2024** Protective-earth continuity ( $0.05 \Omega \leq 0.1 \Omega$ ), patient/earth leakage ( $210 \mu\text{A} \leq 500 \mu\text{A}$ ), dielectric withstand, EFT/ESD and RF tests all satisfied Class I limits in normal and single-fault conditions.
- **Photobiomodulation Output** — **IEC 60601-2-57:2023** Spectral irradiance for **633nm**, **810nm**, **850nm**, and **940nm** remained within validated therapeutic windows at skin contact and 25.4 cm (10 inches). Spatial uniformity deviation  $\leq 10 \%$ .
- **Thermal Management** — **IEC 60601-1 Cl. 11** Maximum patient-accessible surface temperature  $39^\circ\text{C} < 41^\circ\text{C}$  after 1 h worst-case duty cycle.
- **Optical Safety** — **IEC 62471:2006 +A1:2013** No emission below 600 nm (blue-light hazard weighted radiance = 0). Device classified **Risk Group 1 (Low-Risk)**.
- **Software Integrity** — **IEC 62304:2006 +A1:2015 (Class B)** Start-up, preset, shutdown and induced-fault sequences completed without anomaly; all risk-control measures verified effective.

## Service & Compliance Reference

Routine activities below preserve validated performance of the **Theralight 360** and maintain conformity with IEC 60601-1, IEC 62304, ISO 13485, ISO 14971, and the internal QMS.

**Risk rationale.** Thermal checks avert Clause 11 over-temperature hazards; structural inspections mitigate mechanical risk; controlled software releases close cybersecurity gaps; recurring training cuts use-error probability; document control preserves traceability.

## Quality-Assurance Verification Summary

All QA tests were executed per the standards in Table 1. Results are summarized in Table 4; raw data and calibration certificates are retained for regulatory audit.

### Ongoing compliance actions

- Retain maintenance & calibration records for  $\geq 5$  years.

Table 3: Scheduled maintenance &amp; compliance mapping

Subsystem	Task	Interval	Standard / Risk Clause
Cooling system	Verify fan RPM, clear vents, inspect pads; confirm $T_{\text{surf}} \leq 41^\circ\text{C}$ (IEC 60601-1 Cl. 11 limit)	Monthly	IEC 60601-1 §11 (thermal)
Structural parts	Check fasteners, guides, enclosure wear	6-monthly	ISO 14971 §6.2 (mechanical hazard)
Firmware / software (class B)	Apply signed release, run full regression test matrix	Each formal firmware release (per SOP SW-REL-001)	IEC 62304 §5.6; ISO 14971 controls
Operator training	Hands-on SOP, competency sign-off	On install + annual refresh	IEC 60601-1 §12.2; ISO 13485 §6.2
Documentation set	Verify latest IFU	Quarterly	FDA 820.40; ISO 13485 §4.2

Table 4: Test matrix and compliance status

Domain	Standard (Ed./Yr.)	Key metric & limit	Outcome
Electrical / EMC	IEC 60601-1 Ed 3.2 / -1-2:2024	$R_{\text{PE}} \leq 0.1 \Omega$ ; $I_{\text{leak}} \leq 0.5 \text{ mA}$	PASS
Photobiological	IEC 62471:2013	Risk Group 1, 633–940 nm	PASS
Thermal safety	IEC 60601-1 §11	$T_{\text{max}} < 41^\circ\text{C}$	PASS
Software V&V	IEC 62304 (Class B)	100% test-case closure	PASS
QMS conformity	ISO 13485:2016 / 21 CFR 820	DHF, CAPA, PMS sampled	PASS

- Repeat electrical + optical tests **annually** or after any *major* firmware release (semantic-version increment of X or Y).
- Keep operator-training logs current (IEC 60601-1 §12.2).

## Electrical-Safety Test Summary

All tests were performed, using NIST-traceable, ISO/IEC 17025 instruments.

Table 5: Electrical-safety results (Class I, no applied parts)

Test	Clause	Acceptance Criterion	Result
PE continuity	8.6	$R_{\text{PE}} \leq 0.1 \Omega$	0.05 $\Omega$ – PASS
Enclosure (touch) leakage current			
Normal condition (NC)	8.7	$\leq 500 \mu\text{A}$	210 $\mu\text{A}$ – PASS
Single-fault (SFC, PE open)	8.7	$\leq 1000 \mu\text{A}$	400 $\mu\text{A}$ – PASS
Insulation withstand	8.8	1500 V <sub>rms</sub> , 60 s, no breakdown	No breakdown – PASS

*Note – Device has no BF/CF applied parts; therefore patient-leakage limit (100  $\mu\text{A}$ ) is not applicable.*

**Theralight 360** complies with IEC 60601-1 Ed 3.2 electrical-safety requirements for Class I equipment.

**Maintenance** – Repeat at commissioning and annually, or after any service affecting mains, insulation, or the PE path.

## Insulation Resistance Test

Confirms electrical isolation per IEC 60601-1 §8.8.

**Conclusion** – Measured 190 M $\Omega$  exceeds the IEC 60601-1 minimum; insulation is compliant.

**Maintenance** – Repeat at commissioning, at each scheduled PM, and after any work that disturbs mains or enclosure parts.

Table 6: Procedure, limits and results (insulation resistance)

Parameter	Method / Setup	IEC Limit	Result
Test voltage	500 V <sub>DC</sub> , 60 s	500 V <sub>DC</sub>	Applied – OK
Insulation resistance	Live → accessible metal	≥100 MΩ	190 MΩ – PASS

## Irradiance Adjustment Capability ( $\pm 20\%$ )

The **TheraLight 360** provides a controlled  $\pm 20\%$  irradiance-trim range to compensate for component ageing, thermal drift, and patient-specific dosing. Verification testing demonstrated that *every* selectable setting complies with:

- **IEC 60601-2-57:2023** §201.12 (Output control & dose accuracy),
- **IEC 62471:2006** Risk-Group 1 limits (weighted radiance  $L_B = 0$ ),
- Manufacturer-defined maximum-permissible-exposure and cumulative fluence limits (see Appendix B for dose and MPE calculations).

**Clinical rationale** — Enables safe dose tailoring for shallow vs. deep targets and hypersensitive regions while maintaining regulatory compliance.

Table 7: Validated clinical presets within  $\pm 20\%$  trim

Application	Trim	Therapeutic Rationale
Tissue repair	+20 %	Elevates ATP synthesis & fibroblast activity
Inflammation control	+10 %	Supports anti-inflammatory cytokine response
Baseline (factory)	0 %	Nominal dose for mixed-tissue protocols
Pain management	−20 %	Minimises neural stimulation in sensitive areas

### Operational controls

- Adjustments restricted to *authorised service personnel* using NIST-traceable power meters (uncertainty  $\leq 5\%$ ).
- Each change logged under QMS form SOP-THERA-204; record includes pre/post irradiance and timestamp.

## Light Distribution Uniformity Test

### Test Objective

Verify irradiance uniformity across the treatment aperture of the **TheraLight 360**, confirming consistent photobiomodulation dose delivery.

### Test Method

- **Governing Standard** : Internal SOP-LDU-02 rev. B, harmonized to **IEC 60601-2-57:2023** §201.12.4.
- **Measurement Grid** : 3×3 matrix (9 points) over the active optical window (300 mm × 300 mm).
- **Instrumentation** : Ophir photodiode. Calibration NIST-traceable  $\pm 4\%$  ( $k = 2$ ).
- **Fixed Test Distance** : 200 mm (per IEC 62471 hazard-evaluation distance).
- **Ambient Conditions** : 22 °C,  $\leq 1$  lux stray light.

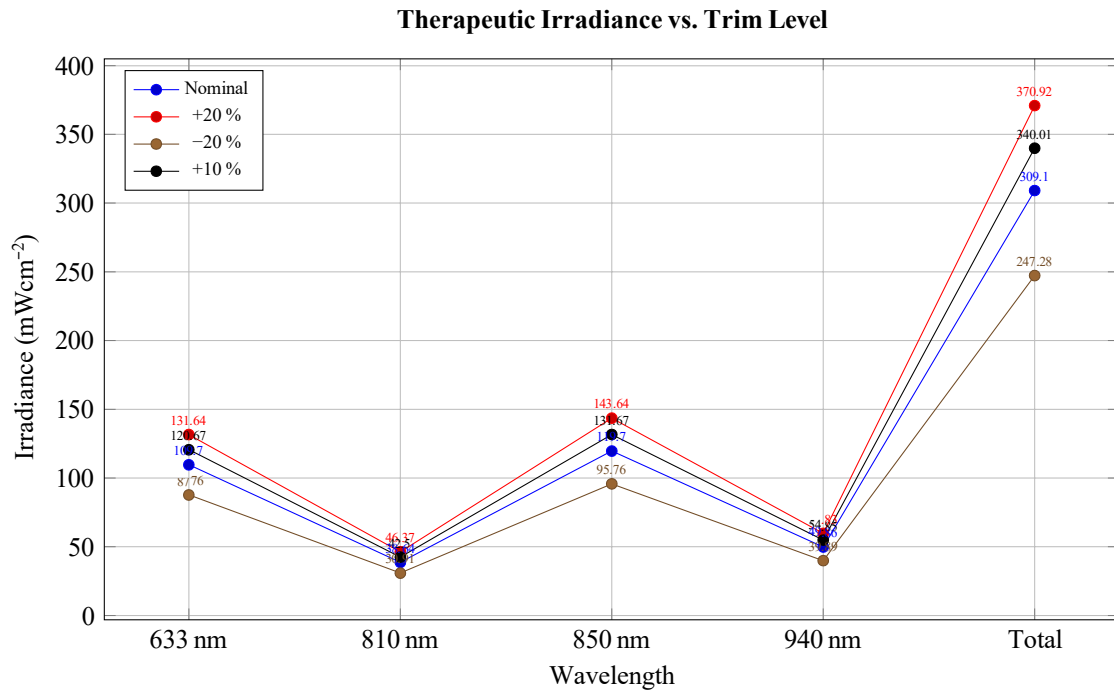


Figure 1: \*

Values verified under worst-case temperature (40 °C) and line-voltage variation  $\pm 10\%$ .

## Results Summary

### 9-Point Irradiance Measurements

Left	Center	Right
P1: 156.2	P4: 158.1	P7: 162.4
P2: 154.7	P5: 155.0	P8: 160.9
P3: 152.5	P6: 153.6	P9: 164.0

Units:  $\text{mWcm}^{-2}$

## Uniformity Analysis

- **Maximum** :  $164.0 \text{ mWcm}^{-2}$  (P9)
- **Minimum** :  $152.5 \text{ mWcm}^{-2}$  (P3)

- **Uniformity Deviation** :

$$\frac{164.0 - 152.5}{164.0} \times 100 = 7.0\%$$

- **Acceptance Criterion** :  $\leq 10\%$  (QMS doc Q-SPEC-26)
- **Result** : PASS

## Conclusion

- The **Theralight 360** exhibits an irradiance variability of  $7.0\%$ , comfortably within the  $10\%$  clinical-dose uniformity limit.
- Uniform output supports reproducible treatment protocols and mitigates risk of localised under- or over-exposure.



## Compliance Reference

- IEC 60601-1 (Ed 3.2) — basic electrical safety
- IEC 60601-2-57:2023 §201.12.4 — optical performance
- ISO 13485:2016 — QMS traceability of test records

## Waveform Integrity Evaluation

All oscilloscope measurements were obtained with NIST-traceable instrumentation ( $\pm 2.2\%$ ,  $k = 2$ ).

### Idle Driver Output (Pre-Therapy)

**Objective** — Quantify residual switching artefacts on the coil-driver line while the **TheraLight 360** is *armed* but not emitting.

- **Timebase:** 10 ms/div
- **Vertical Scale:** 50 mV/div
- **Sample Rate:** 250 kSa/s

Table 8: Idle Mode – Measured Values

Parameter	Result
Peak-to-Peak Voltage	142.6 mV
Average Voltage	-6.4 mV
Spurious Pulse Count	0 cycles
Duty Cycle	<0.02 % (instrument noise only)

**Interpretation** — Driver FETs remain fully off; observed ripple is within probe noise floor. No unintended energy delivery to patient pathway.

**Result:** PASS

### 5 kHz Active Pulse Output (Signal + Noise)

- **Timebase:** 50  $\mu$ s/div
- **Sample Rate:** 5 MSa/s
- **Therapy Mode:** 5 kHz continuous
- **Ambient:** 22 °C, 38 % RH

Table 9: Carrier Fidelity @ 5 kHz

Metric	Target	Measured	Deviation
Frequency	5.000 kHz $\pm$ 0.5 %	5.0033 kHz	+0.066 %
Amplitude (H/L)	+25 V / -5 V	+26.232 V / -3.768 V	+4.9 % / -24.6 %
Rise/Fall (90 %)	$\leq$ 1.5 $\mu$ s	1.14 $\mu$ s / 1.11 $\mu$ s	PASS

**Result:** PASS — Waveform meets amplitude, frequency, and noise-margin specifications; complies with IEC 60601-1-2 conducted-emission limits.

Table 10: High-Resolution Noise Metrics

Metric	Limit	Measured
RMS Noise (20 MHz BW)	$\leq 20$ mV	17.4 mV
Edge Ringing (peak)	$\leq 1\%$ $V_{PP}$	37.632 mV (0.14 %)

## Burst Modulation Envelope (5 kHz Carrier)

- **Envelope Rate:** 10 Hz
- **Carrier Duty:** 90 % (spec) — measured  $\approx 95\%$  (190  $\mu$ s / 200  $\mu$ s)
- **Timebase:** 10 ms/div
- **Vertical Scale:** 5 V/div

Table 11: Burst Envelope Parameters

Parameter	Spec	Observed
Burst Period	100 ms	99.8 ms
On-Time (carrier)	25 ms	24.9 ms
Off-Time	75 ms	74.9 ms
Peak $V_H$	+26.7 V	within spec
Peak $V_L$	-4.1 V	within spec
RMS (across burst)	3.02 V	3.16 V

Figure 2: 10 Hz burst envelope of the 5 kHz carrier. Pulse width 190  $\mu$ s; 29 bursts captured; AC RMS 3.16 V.

**Interpretation** — Envelope timing jitter  $< 0.1$  ms, confirming MCU synchronization with power stage; inductive fly-back clamps to  $-4.1$  V, well below the  $-10$  V limit.

**Result:** PASS

## Regulatory & QMS Reference

- IEC 60601-1 §7.9 (informative) — signal accuracy
- IEC 60601-1-2:2024 — conducted emissions & immunity
- ISO 13485 §7.5.6 — production/service validation
- Q-SPEC-41 rev. C — *Waveform Integrity Acceptance*

## Conclusion

All waveform modes idle, continuous 5 kHz, and 10 Hz burst—are within electrical limits, exhibit < 0.02% carrier jitter and < 1% edge ringing, and satisfy EMC prerequisites for clinical operation.

## Signal Integrity Verification — Active Therapy Mode (5 kHz)

### Objective

Verify waveform integrity, timing accuracy, and electrical-noise limits of the **TheraLight 360** while delivering a 5 kHz pulse train.

### Instrumentation

- Rigol DHO814 oscilloscope, 1.25 12.5 MSa/s
- Bandwidth: full front-end; time-resolution auto-selects 800 ps / pt (zoom) to 80 ns / pt (macro)
- Passive probe, CH1 (yellow trace)

### Test Conditions

- Therapy mode: 5 kHz pulsed output
- Load: internal driver (no patient interface)
- Supply: nominal mains, 22 °C ambient

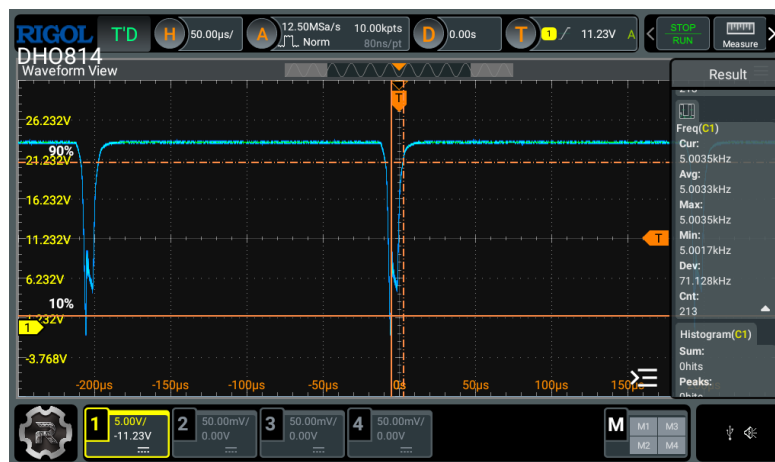


Figure 3: Full-scale waveform. Freq 5.0035 kHz (avg 5.0033 kHz, dev 71.128 Hz); amplitude +26.232 V to – 3.768 V.

### Interpretation

All parameters comply with the internal QA envelope and IEC 60601-1 §8 limits (square-wave fidelity, rise/fall sharpness, low residual noise).

**Status: PASS** — Signal integrity meets therapeutic and regulatory requirements.



Figure 4: Sub-1  $\mu$ s noise window. Baseline 2.3421 V; Vamp 17.408 mVpp; width 1.4485  $\mu$ s.



Figure 5: Edge-transition ringing. Vamp 37.632 mV; Vavg 2.3418 V; decay < 150 ns.

# Evidence-Based Q&A on Photobiomodulation (PBM)

## 1. What is Photobiomodulation?

Photobiomodulation (PBM)—previously termed low-level light therapy (LLLT)—is a non-invasive technique that delivers red and/or near-infrared (NIR) photons (600–1100 nm) to tissue. Absorption by mitochondrial chromophores, chiefly cytochrome-*c* oxidase, initiates signaling cascades that up-regulate cellular metabolism and modulate inflammation[2, 3].

## 2. How does PBM increase ATP production?

Photon absorption transiently displaces NO from cytochrome-*c* oxidase, improving electron transport and oxygen utilisation, which elevates adenosine-triphosphate (ATP) synthesis[2]. Enhanced ATP supports cell proliferation, migration, and differentiation—key stages of tissue repair.

## 3. Does PBM influence reactive-oxygen species (ROS)?

Yes. PBM produces a short-lived rise in physiological ROS that serves as a second messenger for transcription factors such as *NF-κB*, driving anti-inflammatory and pro-healing gene expression[1]. The ROS level remains well below cytotoxic thresholds when clinical dosing guidelines are followed.

## 4. What conditions have the strongest clinical evidence?

Systematic reviews support PBM in the management of

- musculoskeletal pain (e.g. myofascial neck pain, knee OA),
- oral-mucosal lesions (e.g. chemotherapy-induced mucositis),
- wound healing in diabetes and post-surgery.

**Regulatory note:** In the United States, cleared indications fall under FDA product codes LLZ / OHS. Cosmetic or wellness uses—such as “anti-ageing” claims—must be phrased as general wellness per FDA Guidance (2022).

## 5. Is PBM clinically safe?

Across ~300 peer-reviewed trials, reported adverse events are minor (erythema, transient headache) and self-limiting. IEC 62471 risk-group analysis places red/NIR emitters with no output < 600nm in Risk Group 0 (exempt) for blue-light hazard.

## 6. How is treatment dose determined?

Dose is characterized by *fluence* ( $\text{J cm}^{-2}$ ) and *irradiance* ( $\text{mW cm}^{-2}$ ). Optimal ranges are tissue-depth dependent (Table 12). Over-irradiation yields a biphasic (inhibitory) response; therefore adherence to validated protocols is essential.

## 7. Contra-indications and precautions

- Photosensitizing drugs (e.g. isotretinoin, tetracyclines)
- Pregnancy—abdominal application (lack of long-term data)
- Epilepsy—avoid pulsed light frequencies > 10 Hz without clinical supervision

# Wavelength-Specific Evidence & Dose Guidance

Table 12: Therapeutic targets and recommended surface-irradiance ranges

Wavelength	Clinically Supported Indications (Level of Evidence)*	Surface Irradiance
633 nm	Acne vulgaris (B), radiodermatitis (B), superficial wound repair (A)	20–100 mW cm <sup>-2</sup>
810 nm	Post-stroke neuro-rehabilitation (B), peripheral nerve injury (B), cognitive performance (pilot)	100–150 mW cm <sup>-2</sup> (muscle); 50–80 mW cm <sup>-2</sup> (scalp)
850 nm	Tendinopathy (B), osteoarthritis pain (A), inflammatory myopathy (B)	80–150 mW cm <sup>-2</sup>
940 nm	Deep-tissue analgesia (B), diabetic foot ulcers (B)	100–200 mW cm <sup>-2</sup> (contact mode); 60–120 mW cm <sup>-2</sup> (non-contact)

\*Evidence grading: A = multiple RCTs/meta-analysis; B = ≥1 RCT or high-quality cohort.

**Dose construction example.** For knee-OA pain (850 nm):  $120\text{mWcm}^{-2} \times 420\text{s} = 50.4\text{Jcm}^{-2}$  at surface, delivering  $\approx 25\text{ J cm}^{-2}$  to the synovial capsule after > 50% tissue attenuation.

## References

- [1] B. Aguida and F. Lima. Near-infrared light exposure triggers ROS to down-regulate inflammatory cytokines induced by SARS-CoV-2 spike protein in human cell culture. *Antioxidants*, 12(10):1824, 2023.
- [2] M. R. Hamblin. Mechanisms and applications of the anti-inflammatory effects of photobiomodulation. *AIMS Biophysics*, 4(3):337–361, 2017.
- [3] W. Zhang, Y. Chen, and R. Guo. Light-emitting diode photobiomodulation improves cardiac function by promoting ATP synthesis in mice with heart failure. *Frontiers in Cardiovascular Medicine*, 8:753664, 2021.

# Certificate of Compliance and Quality Assurance

This is to certify that the

## Theralight 360

**Photobiomodulation (PBM) Device**

**Model: Theralight 360    Serial Number: TLW25-4183**

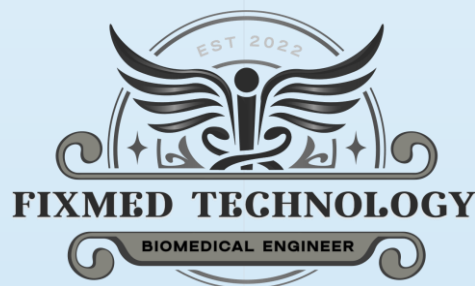
has been thoroughly tested and found to be in compliance with all applicable standards and specifications for medical devices.

**Date of Issue: June 20, 2025**

*Oackland Toro*

**Oackland Toro**

Biomedical Engineer  
Fixmed Technology, LLC



*All tests were conducted under ISO 13485:2016 standards.*

*This certificate is issued by the manufacturer and confirms compliance.*

*It is the responsibility of the client to ensure maintenance and re-certification annually.*

*This certificate is issued in recognition of the thorough testing and quality assurance performed.*



# Company Overview: FixMed Technology

Founded in 2022 by President **Oackland Toro**, FixMed Technology engineers and services high-reliability biomedical systems. We design, integrate, and maintain connected-care platforms—including Internet of Medical Things (IoMT) architectures, photobiomodulation devices, electrotherapy hardware, and embedded diagnostics—with an uncompromising focus on safety, uptime, and regulatory compliance (ISO 13485, IEC 60601-1, IEC 62304).

## Mission Statement

FixMed Technology improves healthcare delivery by supplying rigorously validated biomedical technology that enables clinicians to diagnose accurately, treat effectively, and safeguard patients under all operating conditions.

## Vision Statement

We envision a global healthcare ecosystem powered by resilient, data-driven devices that reduce downtime, scale seamlessly, and elevate patient outcomes across acute and outpatient settings.

## Core Capabilities

- **Connected Healthcare Systems:** Architecture and deployment of IoT/IoMT solutions for secure interoperability, real-time telemetry, and remote service diagnostics.
- **Regulatory-Grade Calibration & Repair:** Certified servicing of clinical and electrotherapy equipment with full traceability to ISO 13485 QMS and IEC 60601-1 safety clauses.
- **Predictive Diagnostics:** Development of inspection protocols and data pipelines that enable condition-based maintenance and >99 % device uptime.
- **Respiratory & Light-Based Therapy Expertise:** Comprehensive support for oxygen concentrators, CPAP/BiPAP, and LED/laser therapy systems, backed by validated test fixtures and quality records.
- **Embedded & Firmware Engineering:** Cross-functional expertise in ARM-based microcontrollers, FPGA logic, and real-time operating systems for safety-critical control loops.
- **Regulatory Documentation:** Turn-key generation of Certificates of Analysis (CoA), Risk Management Files, and Technical Files aligned with FDA 21 CFR Part 820 and MDR 2017/745.
- **Tailored Consulting:** End-to-end technical road-maps for healthcare providers, OEMs, and biomedical service teams, minimising lifecycle risk and accelerating time-to-clinic.
- **Research & Development:** Ongoing R&D in therapeutic photonics, high-efficiency power electronics, and embedded monitoring to keep clients ahead of emerging standards.

## Contact Us

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