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'97 MAR -5 P3:07

February 25, 1997

BY FACSIMILE: 202-205-5295
AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Tanner, Ph.D.
Acting Director,
Division of Programs and Enforcement Policy
Office of Special Nutritionals
CFSAN - Food and Drug Administration
200 C Street, SW, HFS-450
Washington, D.C. 20204

0034 '97 SEP 19 P1:30

RE: Rexall Sundown, Inc. ("Sundown"); Revisions to
Statements of Nutritional Support

Dear Dr. Tanner:

Reference is made to your letter dated January 10, 1997 responding to statements of nutritional support which Sundown submitted to the Food and Drug Administration ("FDA") on January 13, 1997. Your letter was received on February 14, 1997.

Although we do not necessarily agree that the statements raise implied health and/or drug claims, responsive to FDA's comments, we will be revising the statements of nutritional support for our Saw Palmetto Complex and Folic Acid dietary supplements as follows:

Saw Palmetto Complex - Sundown Vitamins

Contains a select combination of ingredients which help maintain and promote healthy prostate and urinary function. Saw Palmetto berries contain a variety of fatty acids and sterols which are helpful for prostate and urinary health. Pygeum contains naturally occurring phytosterols which help promote urinary function. Nettles help promote proper urinary function.

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Folic Acid - Sundown Vitamins

Helps nutritionally in maintaining cardiovascular function and a health circulatory system by contributing to the maintainance of healthy blood levels of homocysteine.

Very truly yours,



Deborah Shur Trinker

Director of Regulatory Affairs and
Corporate Counsel