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JUN 16 2006

Richard Patte, CA
Executive Vice-President
Immunotec Research, Inc.
3 Label Lane
Swanton, Vermont 05488

Dear Mr. Patte:

This is in response to your letter of May 30, 2006 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission stated that Immunotec Research, Inc. is making the following claim, among others, for the product **Immunocal Platinum**:

“Provides increased Lactoferrin to inhibit the growth of disease-causing micro-organisms.”

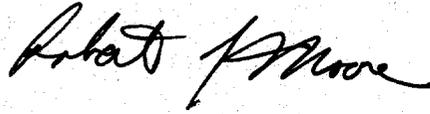
21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statement that you are making for this product suggests that it is intended to treat, cure, prevent, or mitigate diseases. This claim does not meet the requirements of 21 U.S.C. 343(r)(6). This claim suggests that this product is intended for use as a drug within the meaning of 21 U.S.C. 321(g)(1)(B), and that it is subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, Montrose Metro II, 11919 Rockville Pike, Rockville, Maryland 20852.

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Page 2 - Mr. Richard Patte

Please contact us if we may be of further assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Robert J. Moore". The signature is written in a cursive style with a large initial "R" and "M".

Robert J. Moore, Ph.D.
Team Leader, Compliance and Enforcement
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-310
FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200
FDA, New England District Office, Office of Compliance, HFR-NE240



Immunotec Research Inc.

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JUN - 9 2006

2006-5040

May 30th, 2006

Office of Nutritional Products, Labelling, and Dietary Supplements (HFS-800)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD
20740-3835

Re: Notification of a Dietary Supplement entering the US market place bearing a Structure/Function claim pursuant to Section 6 of DSHEA and 21 CFR Part 101.93.

To whom this may concern:

Immunotec Research Inc. wishes to inform the FDA that as of May 6th, 2006, we began commercializing, as a distributor, a Dietary Supplement bearing some Structure/Function claims within the US market place.

The product name containing said claims is "Immunocal Platinum".

The Structure/Function claims used are as follow:

- Assists the body manage normal cellular growth;
- Works with the body to repair damaged cells;
- Provides increased Lactoferrin to inhibit the growth of disease-causing micro-organisms;
- Helps to neutralize acid production from high protein intake;
- Slows down the loss of calcium;
- Improves the body's metabolism of insulin, providing increased energy and more effective weight maintenance;
- Improves mood, energy, well-being, alertness, concentration and clarity.

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The names of the dietary ingredients or supplements which are the subject of said claims are:

- Whey protein isolate;
- Creatine Monohydrate;
- Potassium Citrate;
- Calcium Citrate;
- Sodium Citrate;
- Magnesium Citrate;
- Citric acid monohydrate.

I, Richard Patte, am authorized to certify this Notification on behalf of Immunotec Research Inc. I certify that the information presented and contained in this Notification is complete and accurate, and Immunotec Research Inc. has substantiation that each structure/function statement is truthful and not misleading.

IMMUNOTEC RESEARCH INC.



Richard Patte, CA
Executive Vice-President