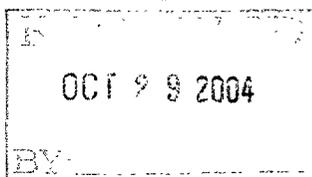




90 Orville Drive, Bohemia, NY 11716-2510 ■ Phone: (631) 567-9500 ■ Fax: (631) 218-7480



Office of Nutritional Products/Labeling & Dietary
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW (HFS-810)
Washington, D.C. 20204

October 22, 2004

Dear Sir or Madam:

This letter will serve as a 30 day notification pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 that NBTY Inc. is using the following statements on the Echinacea with Goldenseal 450 mg supplement under the Giant Eagle brand name.

- Helps Support Healthy Immune Function
- Echinacea and Goldenseal have been researched extensively for their specific, health promoting properties.
- Echinacea may help stimulate natural resistance by helping maintain the immune system and Goldenseal for its continuing reputation as an herbal supplement for use during the winter season.

The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Sincerely,

Angelica S. Vrablic, Ph.D.
Manager, Nutrition Research

ASV/mb

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