

Handwritten initials: HFS

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6/11/98

James Tanner, Ph.D.
Acting Director, Division of Programs and Enforcement Policy
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street SW
Washington DC 20204

Re: *Submission of Structure/Function Claims*

Dear Dr Tanner:

Enclosed are the structure/function claims for the following products, as generated by Dr. Luke Bucci:

- 1) Fred Meyer *Figure Tone* Product #70530
- 2) Fred Meyer *Lecithin* Product #70615, #70620
- 3) Fred Meyer *Chromium Picolinate* Product #71857, #71863
- 4) Schiff® *Pregnenolone* Product #12824
- 5) Excel™ *Diet Formula* Product #52499
- 6) Fred Meyer *Yeast Selenium* Product #71867
- 7) Fred Meyer *Dessicated Liver with Vitamin B-12* Product #70555
- 8) Fred Meyer *Natural Garlic Oil* Product #70916, #70917
- 9) Fred Meyer *Chewable Vitamin C* Product #70330, #71861
- 10) Fred Meyer *Vitamin C* Product #70340, #70345
- 11) Fred Meyer *Vitamin C with Rose Hips* Product #70840, #70885
- 12) Fred Meyer *Time Release Vitamin C with Rose Hips* Product #70355, #70360
- 13) Fred Meyer *Vitamin C with Rose Hips* Product #70890, #70893
- 14) Fred Meyer *Time Release Vitamin C with Rose Hips* Product #70365, #70370

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- 15) **Fred Meyer** *Special C-500 with Bioflavonoids* Product #70220
- 16) **Fred Meyer** *Time Release Vitamin C with Rose Hips* Product #70375, #70215
- 17) **Schiff®** *PhenCal™* Product #12783
- 18) **Fred Meyer** *Vitamin B-6*
- 19) **Spring Valley** *B Complex* Product #43575
- 20) **Spring Valley** *Niacin* Product #49910
- 21) **Spring Valley** *Super B Complex in a Base of Yeast and Liver* Product #43585
- 22) **Spring Valley** *B Complex with Vitamin C* Product #43663
- 23) **Spring Valley** *B Complex with Vitamin C* Product #43571
- 24) **Schiff®** *Shark Cartilage* Product #12704

We welcome the opportunity to receive feedback from your office as we continue to interpret how to write structure/function claims as allowed by the Dietary Supplement Health and Education Act. There are some areas of overlap between nutrient functions or their effects on body structure and health claims. We anticipate that we will continue to fully comply with your interpretation of health claims.

Please feel free to contact me if you have further questions or comments.

Respectfully,



De Lois L. Shelton, Regulatory Compliance

cc: Dave Mastroianni, Luke R. Bucci