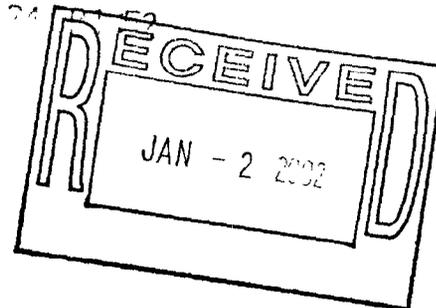




6515 702 JAN 24 2002

December 13, 2001



Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics Inc.)	Fiber Delights	Enriched inulin, fructose, oat fiber	Promotes healthy gastrointestinal function.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: 
Cheryl Myers
Title: Director of New Product Development

Date: 12-13-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,

Jeanene Moenckmeier
Director of Legal Affairs
Fiber Delights 2p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
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TOLL FREE 800-553-2370
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