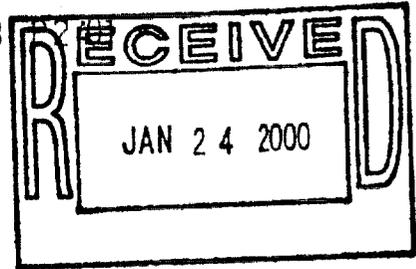




14 January 2000

CERTIFIED MAIL

8027 '00 FEB -8



Robert Moore, Ph.D.
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 "C" Street, SW
Washington, D.C. 20204

Re: Food Labeling; Notification of Statements on Dietary Supplement.

Dear Dr. Moore:

Pursuant to 21 C.F.R. Subpart F, section 101.93, Chattem, Incorporated ("Chattem", the distributor, which is located at 1715 West 38th Street, Chattanooga, TN 37409) wishes to notify the Food and Drug Administration that it has, within the past 30 days, commenced marketing a dietary supplement which bears statements of nutritional support in its labeling.

The following statements are being made for the dietary supplement NewPhase™.

- Phytoestrogen support for women.
- NewPhase supports hormonal balance so important for smooth menopausal transition and for maintaining good cardiovascular health and strong bones.
- Scientists observe that many women eating a traditional diet high in isoflavones tend to have good cardiovascular function and healthy bones and experience a more comfortable menopausal transition.
- Clinical studies have shown that each of these herbs plays a supportive role in maintaining hormonal balance.

These statements are accompanied by the required disclaimer, which is prominently displayed in a box in bold-faced type. The information contained in this notice is complete and accurate. Chattem maintains on file substantiation that these statements are truthful and non-misleading. An original and two copies of this notification are being submitted.

Sincerely,

Michael Law, Ph.D.
Manager, Regulatory Affairs

ML
Enclosure

97S - 0162

CHATTEM, INC.
1715 West 38th Street
Chattanooga, TN 37409
(423) 821-2037

LET 4899