

HUNTER, MACLEAN, EXLEY & DUNN, P.C.

ADMINISTRATIVE STAFF

ATTORNEYS AT LAW

SAVANNAH BANK AND TRUST BUILDING
2 EAST BRYAN STREET
P.O. BOX 9848
SAVANNAH, GEORGIA
31412-0048

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E. ORMONDE HUNTER (OF COUNSEL)
MALCOLM R. MACLEAN
WM. MALLIE EXLEY, JR.
H. MITCHELL DUNN, JR.
JOHN M. HEWSON, III
NELL C. PILLARD
MARK M. SILVERS, JR.
ARNOLD C. YOUNG
W. BROOKS STILLWELL, III
F. SAUNDERS ALDRIDGE, III
THOMAS B. GILBERT, JR.
ROBERT S. GLENN, JR.
LEE C. MUNDELL
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ROLAND B. WILLIAMS
NEIL A. CREASY
LEONARD J. PANZITTA
DON L. WATERS
MOLLY S. MCKIBBEN
JONATHAN D. SPRAGUE
JOHN H. MACLEAN
CRAIG S. BONNELL (OHIO ONLY)
JOSEPH R. ROSS (GA. & FLA.)
RUTH H. GOLDSMITH (N.C. ONLY)
HAROLD B. YELLIN

JAMES P. HOULIHAN
(1908 - 1979)

RALPH O. BOWDEN, III
(1942 - 1981)

CABLE ADDRESS
ANCAN

TELEPHONE AND TELECOPIER
(912) 236-0261

TELEX No 54-6483

SPENCER CONNERAT, JR.
(SPECIAL COUNSEL)

November 15, 1982

Dockets Management Branch (HFA-305)
Food & Drug Administration
Room 4-62
5600 Fisher's Lane
Rockville, MD 20857

RE: Skin-Bleaching Drug Products
for Over-the-Counter Human Use;
Tentative Final Monograph Docket No. 78N-0065

Dear Sir or Madam:

Carson Products Company filed a comment in response to the Agency's publication of a Tentative File Monograph on November 1, 1982. The enclosed letter from Lockhart & Pettus, Inc. was inadvertently omitted from this letter. I would appreciate it very much if you would add it to Carson Products Company's comments.

Thank you very much.

Sincerely,

John M. Hewson, III

JMH, III/ms

Enclosure

cc: Mr. Mario de la Guardia
Mr. Steve McNamara
Mr. J. Hungerpiller

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Lockhart & Pettus, Inc.

Advertising and Public Relations

October 29, 1982

Mr. Kenneth D. Hall
VP, Marketing
Carson Products Company
P.O. Box 22309
Savannah, GA 31403

Dear Ken:

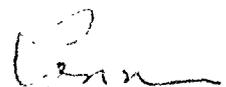
This letter submits the Agency's statements regarding skin toner products.

As minority advertising specialists, we have continual contact and dealings with minorities. The nature of our business requires that we maintain a thorough understanding of various products and the effect of their benefits and attributes on consumers.

In our professional opinion, the benefits of skin toner products are not limited to moisturizing the skin, but do, in fact, serve to even-out the tone of the skin, reducing the "blemished" appearance normally caused by the aging process. Skin toner products are not positioned to customers as "moisturizers". Their primary function is to give the skin an even colored tone.

Should you have any further questions on this, please advise.

Best Regards,


Ronn D. Harris
Vice President

RDH/lsc