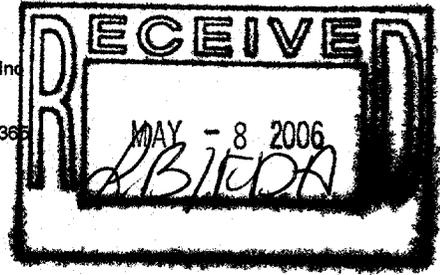


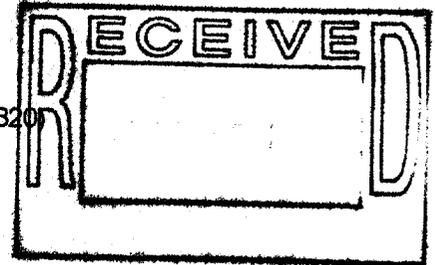
**PISCIMUM
INTERNATIONAL, INC**

Piscium International, Inc
779 Granite Ave.
Langhorne, PA 19047
Telephone: 267-210-9365
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May 2, 2006

Division of Standards and Labeling Regulations
Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-820)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD, 20740-3835



Dear Sir or Madam:

My name is John H Choi of Piscium International, Inc, 779 Granite Ave. Langhorne, PA 19047. I am the authorized representative and US Agent for BINEX Co., Ltd of 480-2, Jangrim-Dong, Saha-Gu, Busan, Korea.

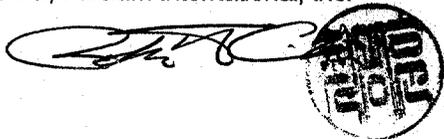
New Dietary Ingredient is Bacillus Polyfermenticus SCD

This Bacillus is found in Kimchi (Korean native fermented vegetables). Kimchi, one of Korean traditional fermented food, in addition to Korean hot pepper paste (guchujang), soybean paste (doenjang) and soy sauce, is a Korea-representing food, true to the name, and significant subsidiary food not to be ruled out of Korean food culture. Until recently, very little studies were performed on Kimchi and its nutritional and functional value. However, the domestic researchers have reported on the findings from reviewing Kimchi's value as a health food, step by step. With these studies, BINEX researchers presumed the reason why incidence of large intestine cancer is lower to Korean is that they take so much Kimchi and they believe that fermented Kimchi liquid has its direct anti-cancer effect against MG-63 human body osteosarcoma cell and K-562 leukaemia cell and also observed, from their anti-mutation experiment, that methanal extract of the fermented Kimchi has mutation-checking effect against carcinogenic substances aflatoxin B1 and N-methy-N-nitro-N-nitrosoguanidine(MNNG). They believe that microorganism involving in fermentation of Kimchi has its cancer-restraining effect and from their experiment with rat administered Kimchi fermented bacillus in vivo, believe that Kimchi fermented bacillus give its counteracting poison effect against the poisonous substance(a-naphthol) and cell wall extract of Lactobacillus plantarum of the fermented bacillus involved in fermenting Kimchi has direct anti-cancer effect against ascites cancer and solid cancer triggered by sarcoma 180 cell lines.

Study showed Kimchi, a Korean traditional fermented food that is known to have nutritional and functional value as a health food, had the characteristics of cancer-preventing effect by way of researching antigenotoxic effect of dominant fermented bacillus involved in fermenting Kichi by the said SCGE (Single Cell Gel Electrophoresis) or comer assay.

Sincerely,

John H Choi
CEO, Piscium International, Inc.



2006-4117