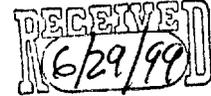




Whitehall-Robins  
Five Giralda Farms  
Madison, NJ 07940-0871  
Telephone (973) 660-5500  
Website address: <http://healthfront.com>

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June 25, 1999



**Caltrate® 600**

Notification of Statements on Dietary Supplement Labels

Elizabeth A. Yetley, Ph.D., R.D., Director  
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

Dear Dr. Yetley:

Reference is made to Caltrate® 600, marketed by Whitehall-Robins Healthcare ("Whitehall-Robins"), a division of American Home Products Corporation.

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, as codified in 21 U.S.C. §343(r)(6), notification is submitted for structure/function statements made on the following dietary supplement product.

Product Name: Caltrate 600  
Ingredient: Calcium Carbonate  
Company Name/ Address: Whitehall-Robins Healthcare  
Five Giralda Farms  
Madison, New Jersey 07940

Statement on the Label:  
Side Panel of Label

- Each tablet provides more calcium for your bones than any leading brand.\*

In accord with 21 CFR §101.93, the disclaimer statement is **bolded** and boxed on the panel of the carton where structure/function claim appears.

Additionally, the back panel of the label contains the health claim “may reduce the risk of osteoporosis” with all required information for use of such claim.

The undersigned certifies that the information contained in this notice is complete and accurate, and that Whitehall-Robins has substantiation that the statement made is **truthful** and not misleading.

As required, the original and two copies of this notification are enclosed. If you have any questions regarding this information, please contact the undersigned at (973) 660-575 1.

Sincerely,

WHITEHALL-ROBINS HEALTHCARE



Eleanor F. Barbo  
Senior Director  
Regulatory Affairs