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SEP 22 2005

Mr. Jason Lee
CEO
USA CTT Co., Inc.
5455 Wilshire Boulevard
Suite 903
Los Angeles, California 90036

Dear Mr. Lee:

This is in response to your letter of August 12, 2005 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that USA CTT Co., Inc. is making several claims for the product **Mom Water, Mineral Water**.

You identify label your product using the terms "water" and "mineral water." As such, you are representing your product to be a bottled water, which is a standardized food (see 21 CFR Part 165). Moreover, the term "mineral water" is a particular type of bottled water defined by regulation (see 21 CFR 165.110(a)(2)(iii)). 21 U.S.C. 321(ff) defines the term "dietary supplement." As defined by the Act, dietary supplements do not include products represented for use as conventional foods. 21 U.S.C. 321(ff)(2)(B). The product described above, in that it is being described as a water and mineral water, is being represented as a bottled water, a standardized food. In doing so, this product is being represented for use as a conventional food. Therefore, in that it is represented for use as conventional food, it is not a dietary supplement within the meaning of 21 U.S.C. 321(ff) and claims made for it are not subject to 21 U.S.C. 343(r)(6).

Instead, this product appears to be a conventional food that must meet the regulatory requirements that apply to conventional foods rather than those requirements that apply to dietary supplements, and in particular those requirements that apply to bottled water (21 CFR Part 165). Briefly, it must bear nutrition labeling in accordance with 21 CFR 101.9 and claims may be made for the product in its labeling if they are claims defined by 21 U.S.C. 343(r)(1) or 21 U.S.C. 321(g)(1)(C) that may be made for conventional foods. Additionally, under the Act, any ingredient intentionally added to a conventional food must be used in accordance with a food additive regulation unless it is generally recognized as safe (GRAS) among qualified experts for its intended use in food. A food ingredient that is not GRAS or

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an approved food additive causes a food to be adulterated under 21 U.S.C. 342(a)(2)(C) and cannot be legally marketed in the U.S.

Please contact us if we may be of further assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'SJW', with a long horizontal flourish extending to the right.

Susan J. Walker, M.D.
Director
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-310

FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200

FDA, Los Angeles District Office, Office of Compliance, HFR-PA240

USA CTT Co., INC

5455 Wilshire Blvd., Suite 903, Los Angeles, CA 90036 Tel: (323) 634-0332 Fax: (323) 634-0309

Office of Special Nutritional (HFX-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

Aug 24 2005

August 12, 2005

Notification Letter for Statement on Dietary Supplement

Dear FDA officers:

I am the CEO of USA CTT Co. Inc, who is, among other things, a relabeler and distributor of dietary supplements in the Republic of Korea. I am writing as per Code of Federal Regulations, Volume 21, Part 101.93, to notify you that we have included statements on the label and in the labeling of one of our products. The following are the information required in this notification letter:

1. Statement of Purpose:

This is a letter to provide notification of a statement of nutritional support, including the exact wording that appears on the label and labeling for a dietary supplement.

2. Vendor Information:

Name, address, telephone and fax numbers of the manufacturer and distributor for mailing and other communication purposes, are as follows:

USA CTT Co. Inc.
5455 Wilshire Blvd., Suite 903

Aims
2005-5741

1360

Los Angeles, CA 90036

Tel: (323) 634-0332

Fax (323) 634-0309

3. Product Identification:

The trade name of the product:

Mom Water, Mineral Water

The common and usual name of the product:

Mom Water

A label (Supplement Facts) showing original mineral water information displayed and provided to consumers is attached

4. Exporter Information:

Name, address, telephone and fax numbers of the exporter for mailing and other Communication purposes are as follows:

JINHAI DEVELOPMENT CO., LTD.

1129-11 Unnam-dong Joongku Incheon City, Korea

Park, Won Ja (Chairman)

Tel: (032) 752-6000

Fax: (032) 752-6008

5. The text of the Structure/Function Statement:

Super Mineral water discovered from confined aquifer from more than 800 meters underground is called, "Hae Yang Arm Ban Shim Hae Su". This type of water ages in the high-pressure condition for at least 6000 years. Due to a high-pressure nature of the aging process, the water is ionized into small particles which help the human body to absorb it fast and easy. It also has an abundance of mineral that is very similar to body fluids. Moreover, the 'Hae Yang Arm Ban Shim Hae Su' includes helpful minerals such

as Ca, Mg, Na, and K. Thus, it helps boosting metabolism and promoting the blood circulation. Most importantly, it removes active oxygen that helps preventing oxidization of the body.*

6. **Ingredient Statement**

This product is a single ingredient product: Mom Water.

7. **Intended Use:**

This product is intended to be used as a beverage by persons over the age of 12.

Suggested use: Twice daily (morning and evening) at a total daily consumption of 250 ml (half bottle)

Caution:

1. Not recommended for persons with kidney disease or high blood pressure. Consult a doctor if you are pregnant or lactating.
2. If symptoms of diarrhea or any physical problem develops, discontinue drink this product and consult a physician immediately.

8. **Statement of Affirmation:**

We, as manufacture and distributor of the above mentioned product, affirm that we have substantiation that the structure/function statement (as shown in No. 5 above) made under 403(6)(r) of the federal Food, Drug and Cosmetic Act is truthful, not misleading, and scientifically valid and that the product does not present a significant or unreasonable risk of illness or injury under the conditions of use recommended or suggested in the label or labeling.

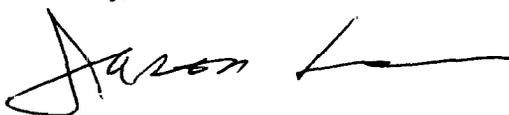
9. **Disclaimer:**

At the end of each structure/function statement, there is an asterisk that refers to another asterisk placed adjacent to the disclaimer. The disclaimer is placed at the bottom of the same panel or, in adjacent with the structure/function statement. The disclaimer reads:

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

If you have any questions about these provided comments, please do not hesitate to contact me at (323) 634-0332. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Lee", with a long horizontal stroke extending to the right.

Jason Lee

USA CTT Co. Inc. CEO

Enclosures

Supplement Facts

Serving Size : 250ml(16.9fl.oz) per day
Servings per bottle 4(in 2 days)

Amount Per Daily Serving

Total Calorie 0

	% Daily Value*
Total Fat 0g	0%
Sodium 1400 mg	60%
Total Carbohydrate 0g	0%
Protein 0g	
Vitamin A 01.U.	0%
Vitamin C 0mg	0%
Calcium 700mg	70%
Iron 0.1mg	0%
Potassium 4mg	†
Zinc 0.1mg	0%
Magnesium 150mg	35%

* Percent Daily Values are based on a 2,000 calorie diet.
† Daily Value not established.