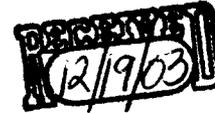


Shaklee Corporation

Hacienda Campus
4747 Willow Road
Pleasanton, CA 94588-2740
Telephone 925/924-2586
Fax 925-924-2155

Marjorie L. Fine

Senior Vice President and
General Counsel



Via Federal Express

December 15, 2003

Susan J. Walker, M.D.
Director (HFS-800)
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling, and
Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Re: Section 403(r)(6) Notification

Dear Dr. Walker:

This acknowledges your letter, dated November 24, 2003, responding to Shaklee's letter of October 31, 2003, submitting statements pursuant to section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 343(r)(6)) to be used with the Shaklee's dietary supplement, **Pain Relief Complex**. In light of the concerns expressed in your letter, Shaklee will take the following actions:

- The statement, "Improves restricted joints" will not be used.
- The statement, "Relieves discomfort in joints caused by overexertion" will be modified to read, "Relieves discomfort caused by overexertion."
- The statement, "Natural pain relief for overworked joints" will be modified to read, "Natural pain relief for occasionally overworked joints."

In addition, in order further to clarify the context of the use of the product, and the nature of the occasions when it would appropriately be used as a dietary supplement, Shaklee will make the following change:

- The statement "Promotes comfortable joint movement" (on which you did not comment) will be changed to read, "Promotes comfortable joint movement after exercise."

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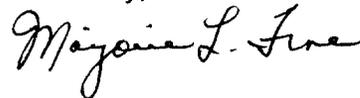
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Shaklee Corporation
Susan J. Walker, M.D.
December 15, 2003
Page 2

Shaklee understands that direct or implied arthritis claims cannot be made for dietary supplements. The purpose of our dietary supplement, **Pain Relief Complex**, is to provide benefits in those non-disease situations, such as overexertion in sports, housework, gardening, or similar situations when concentrated activity by otherwise sedentary individuals can create discomfort, without any underlying disease state or etiology.

With the modifications outlined above, Shaklee believes the statements are within FDA's guidance as expressed in the January 6, 2000 Preamble, and that, within that framework, the product name is proper. Please treat this response as an additional 403(r)(6) Notification for the modified statements.

Sincerely,

A handwritten signature in cursive script that reads "Marjorie L. Fine".

Marjorie L. Fine

MLF/ams