

FRONTIER™

NATURAL PRODUCTS

RECEIVED
3/12/98

February 25, 1998

Office of Special Nutrients
Center for Safety and Applied Nutrition
Food and Drug Administration
200 C Street SW
Washington, DC 20202

3080 '98 MAR 31 P3:12

Dear Madam or Sir:

Frontier Natural Products is notifying you of our use of the enclosed list of dietary supplement label statements for "Frontier" brand products.

To the best of our knowledge at this time, the following information is true and correct: the name and address of the company is correctly stated, the text of the statement is identical to the statement on the label, the name of the dietary ingredient that is the subject of our statement and the brand of the product are both stated in this submission as they are on the product.

Because the FDA has refused to define the term "substantiation", we do not know the type and amount of information necessary to satisfy the agency's substantiation requirement. Therefore it is impossible to "substantiate" that the statement in this submission is truthful. It is equally impossible to say that any statement could never be misleading to someone at sometime. However, we do believe that we have a reasonable basis for believing at the time of this submission and based on the information reasonably available to us and despite the lack of definition of "substantiation" by the FDA that the statements we are submitting are truthful and are not misleading.

Sincerely,



Kathy Larson
Director of Quality Assurance

97S-0162

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Astragalus root	benefits for enhancing natural resistance
Bee Pollen	research findings indicate it may assist in maintaining liver health, it is particularly high in phytic acid which may enhance the body's natural detoxifying functions
Echinacea purpurea herb	enhancing natural resistance through gentle stimulation of the body's own defense mechanisms
Echinacea purpurea root	enhancing natural resistance through gentle stimulation of the body's own defense mechanisms
Eleuthero ginseng root Eyebright herb	herbal adaptogen, may enhance physical and mental performance support of eye health
Feverfew leaf & flowers	in scientific studies, feverfew has been shown to inhibit the formation of prostaglandins
Gingko leaf	improve peripheral circulation, thus increasing blood supply to the brain, head, hands, legs and feet, ability to enhance oxygen flow to the brain
Hawthorn berries	supporting healthy cardiovascular functions when combined with regular exercise and good dietary habits
Horsetail herb	natural support of the urinary tract
Kelp	an abundant source of iodine content, making it a desirable nutritional element for proper thyroid functioning
Psyllium seed husk	helps support healthy bowel function, fibers ability to absorb and hold water contributes to maintaining normal transit time of waste material through the body
Psyllium seed	
Red Clover herb	a powerful anti-oxidant compound called flavone in red clover
Senna leaf	supports healthy bowel function, support healthy elimination
Valerian root	promotes relaxation at night, natural enhancement of nighttime rest and relaxation
Echinacea angustifolia root	helps support natural resistance

Echinacea angustifolia herb	helps support natural resistance
Chamomile flowers	calms evening restlessness and nutritionally supports the digestive system
Devils Claw root tuber	enhance joint and muscle health
Fenugreek seed	support healthy blood sugar levels
Korean Ginseng root	offer support for people seeking to optimize physical and mental performance
Cascara Sagrada bark	supports healthy bowel function, naturally enhance the body's elimination process
Butcher's Broom root	research suggests it may have benefits for the circulatory system, helping to tone vessels and support circulation
Guggul resin	promotes healthy cholesterol levels, research suggests that guggul, along with good dietary choices may help the body maintain healthy cholesterol and triglyceride levels to support circulatory function
Saw Palmetto berry	help maintain healthy urinary function in mature men
Kava Kava root	Scientific studies show that kava kava may be of benefit whenever relaxation is needed
Uva Ursi leaf	supports healthy urinary tract, support healthy urinary function
Cranberry fruit	support for urinary and bladder health
Valerian root	natural enhancement of nighttime rest and relaxation
<i>see docket 975-0163</i> [Elder flowers	support during cold and flu season
St. John's Wort herb	useful in maintaining a healthy and stable mood