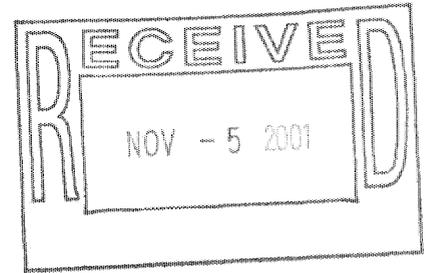




Innovative Nutrition Solutions

4393 '01 NOV 27 P1:36



October 24, 2001

Food and Drug Administration
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
200 C Street, SW
Washington, DC 20204

Dear Sirs:

Notice is hereby given that Rexall Sundown, Inc. ("Sundown") located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement under the Sundown brand name bearing the following statement(s) on the label and/or in the labeling:

Bilberry Extract: [For] healthy eyes. Bilberry reduces visual fatigue and supports overall eye health. It contains compounds called anthocyanosides that strengthen small blood vessels. No other herb does so much to protect eye health. Bilberry enhances visual acuity by maintaining capillary strength and promoting normal blood flow. For a lifetime of healthy vision, protect your eyes with daily use of Sundown's Bilberry Extract. Protect your eyes.

Vitamin C, Ginkgo Biloba [and] Co Q-10: Healthy eyes and veins require high antioxidant levels and good circulation. Use these additional Sundown products.

Bilberry Extract XTRA: [For] eye health. Bilberry reduces visual fatigue and supports overall eye health. It contains compounds called anthocyanosides that strengthen small blood vessels. [It] combines bilberry with other beneficial herbals to enhance visual acuity by maintaining capillary strength and promoting normal blood flow. For a lifetime of healthy vision, protect your eyes with daily use of Sundown's Bilberry XTRA. Protect your eyes. Healthy eyes and veins require high antioxidant levels and good circulation. Use these additional Sundown products: Vitamin C, Ginkgo Biloba [and] Co Q-10.

The undersigned certifies that the information contained in this notice is complete and accurate and that Sundown has substantiation that the statement is truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely,

Deborah Shur Trinker

Deborah Shur Trinker, Esquire
Senior Vice President
Regulatory Affairs

975-0162 LET 8780

Enclosure 6111 BROKEN SOUND PKWY. NW • BOCA RATON, FLORIDA 33487
561-241-9400 • FAX 561-995-5188