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Office of Nutritional Products
Labeling & Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

December 15, 2004

Dear Sir or Madam:

This letter will serve as a 30-day notification pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 that NBTY Inc. is using the following statements on our Osteo Bi-Flex® Triple Strength supplements under the Rexall and/or Rexall Premium label(s):

Ingredients: Vitamin C, Manganese, Sodium, Glucosamine HCl, Chondroitin Sulfate, Boron

- Helps renew cartilage & lubricate joints for joint comfort.
- The specialized blend of ingredients in Osteo Bi-Flex® helps support range of motion for comfortable joint movement.
- Individual results may vary, but when taken every day, Osteo Bi-Flex® can help promote flexibility and mobility.
- Osteo Bi-Flex® promotes joint flexibility, comfort and range of motion by helping to support joint and cartilage health over time.
- As we age, the body is less able to renew and maintain the supportive cartilage structures surrounding joints and bones.
- In order to promote joint comfort, Osteo Bi-Flex® supplies the scientifically researched ingredients, Glucosamine and Chondroitin, at the most popular levels to help maintain and renew cartilage and joints.
- Plus Osteo Bi-Flex® contains added nutrients for joint health: Vitamin C, Boron and Manganese.
- By providing your body with the valuable nutrients that lubricate and renew joints and cartilage you are taking a major step in managing your joint health.
- Factors such as weight, gender, genetics and nutrition can also play a role in joint health.
- Individual results may vary, but when taken every day, Osteo Bi-Flex® can help promote flexibility and mobility by working to revitalize cartilage and lubricate joints.

The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Sincerely,

Angelica S. Vrablic, Ph.D.
Manager, Nutrition Research

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