NBTY INC.
90 Orville Drive, Bohemia, NY 11716-2510 ■ Phone: (631) 244-2000 ■ Fax: (631) 218-7480

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 Alpha Lipoic Acid supplements under the Radiance label:

- Supports Antioxidant Health.
- Alpha Lipoic Acid is a vitamin-like antioxidant that helps fight cell-damaging free radicals in the body.
- Free radicals can contribute to oxidative stress, which in turn may contribute to the premature aging of cells.
- As an antioxidant, Alpha Lipoic Acid also helps revitalize the underlying structure of skin, so it can look healthier and more radiant.

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

ASV/mb

97S 0162 LET 15327

90569