IdeaSphere™ inc.

January 6, 2005

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

Dear Sir or Madam;

This letter will serve as a 30-day notification, pursuant to 403 (r) (6) of the Federal Food, Drug & Cosmetic Act and regulations promulgated thereunder.

Product Manufacturer: IdeaSphere Inc.
150 Motor Parkway
Hauppauge, NY 11788

Text of statement being made: "antioxidant activity"
"...helping to protect the body from free radical damage"

Dietary supplement ingredients: Vitamin C

Dietary supplement brand and name: Twinlab Ultra Harvest PREMIUM NATURAL C TABLETS

As required, enclosed are two photocopies of this notification.

The signee certifies that the information contained in this notice is complete and accurate, and that IdeaSphere Inc., has substantiation that the statements being made are truthful and not misleading.

Sincerely,

Myron Lyskanycz
Vice President of Marketing
IdeaSphere Inc.

975 0162 LET 15448

Enclosures

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