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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

January 28, 2005

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 Spider-Man™ Multivitamin with Extra-C supplements under one or more of the following brand names: American Health, Bioenergy Nutrients, Body Fortress, CVS, Dollar General, Duane Reade, Giant Eagle, Good 'N Natural, Health's Finest, Heartland, HealthSmart Vitamins, HealthWatchers, Kaiser Permanente, Life's Finest, Major, Met-Rx, Natural Wealth, Naturalist, Nature's Bounty, Nutrition Headquarters, Nutrition Warehouse, PhysioLogics, Precision Engineered, Puritan's Pride, Radiance, Rexall, Sam's Club, Shoprite, Sundown, Target, US Nutrition, Vibrant Health, Vitamin World, Walgreens, Walmart and WorldWide Sports:

Ingredients: Vitamin A, Vitamin C, Vitamin D, Vitamin E, Thiamin, Riboflavin, Niacin, Vitamin B-6, Folic Acid, Vitamin B-12, Calcium, Sodium

- Great taste is just the beginning...Provides essential Vitamins and Minerals, including Vitamin C to promote good health.
- Contains as much Vitamin C as three 8 fl. ounce glasses of orange juice.
- The calcium your children get during their growing years helps determine the strength of their bones and teeth for the rest of their lives.
- Vitamin A is essential for new cell growth and healthy tissue.
- Vitamin D helps maintain strong bones and teeth by enhancing absorption of calcium and Phosphorus.
- Thiamin metabolizes sugar and starch to provide energy.
- Riboflavin is important for metabolism and energy production.
- Niacin helps maintain a healthy nervous system.
- Vitamin C is essential for healthy immune function
- Vitamin B-6 is essential for metabolism of protein and fats.
- Folic Acid helps maintain a healthy circulatory system.
- Vitamin B-12 aids normal development and regeneration of red blood cells.

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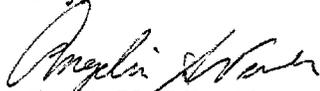
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The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Sincerely,


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

ASV/mb