

PREMIER DIRECT_{INC.}

245 N.E. 4th Avenue, Suite 201, Delray Beach, Florida 33483
(561) 278-6080 TEL • (561) 278-1139 FAX

5832 '99 AUG 13 12:01

July 27, 1999

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



RE: 21 U.S.C. Section 343(r)(6) Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of the Next Generation product. Premier Direct, Inc. is a manufacturer of Next Generation.

Statements Being Made in the Labeling of Next Generation

- (1) for feeling and looking your very best.
- (2) Next Generation provides powerful immune system supporting nutrients
- (3) to support cardiovascular health, proper nerve and cell function, and a strong immune system.
- (4) food factors play an important role in keeping the body healthier and functioning at maximum capacity.
- (5) to support vibrant long-term health.
- (6) having adequate levels of essential nutrients is critical to maintaining a healthy immune system
- (7) proven antioxidant qualities
- (8) lycopene, a carotenoid found primarily in tomatoes has been the focus of cutting-edge research as a potent, protective agent and supports a healthy prostate.
- (9) to support cardiovascular health, proper nerve and cell function, and a healthy immune system.
- (10) promote energy throughout the day.
- (11) super high-potency antioxidant formula
- (11) super high-potency antioxidant formula
- (12) Next Generation formulation process is designed to maximize nutrient utilization and thus vibrant health
- (13) gives you boost in energy

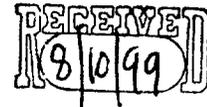
97S - 0162

LET 4004 66458

PREMIER DIRECT_{INC.}

245 N.E. 4th Avenue, Suite 201, Delray Beach, Florida 33483
(561) 278-6080 TEL • (561) 278-1139 FAX

- (14) Next Generation maximum antioxidant support to enhance your immune system, and promote a longer, healthier life
- (15) Bilberry and lutein are included to help healthy vision
- (16) Powerful protection for the heart
- (17) vital support for digestion of the overprocessed foods so often found in modern diets
- (18) heighten your energy throughout the day
- (19) feel more energized than ever
- (20) My unique formula has these potent free radical scavengers to boost your immune system -
Lycopene Extract, Broccoli
- (21) Maintains healthy brain function - Choline Bitartrate, Phosphatidylcholine



To the best of my knowledge, and based upon information and belief present at the time of executing this notice, I certify that this information is accurate and complete and Premier Direct, Inc. possesses substantiation that the statements are truthful and not misleading.

A handwritten signature in black ink, appearing to read "John K. ...", written over a solid horizontal line.