



THE WINNING
COMBINATION
The Informed Choice

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Director
Special Nutritionals
Center for Food Safety and Applied Nutrition
FDA
200 C Street S.W.
Washington, DC 20204



RE: Ultimate Bone Support / Bone Benefits

Dear Sir / Madam:

This is a 30-day notification for a two dietary supplements. The product names are **Ultimate Bone Support** and **Bone Benefits**. The structure / function claims on all sizes and configurations of these products are identical. They are as follows:

Ultimate Bone Support / Bone Benefits™ supports a healthy skeleton by combining 50% of the daily requirement for Calcium with several other important nutrients, as well as two unique standardized extracts from Soy (Ipriflavone and Novasoy™). **Ultimate Bone Support / Bone Benefits™** is designed to support your body in its efforts to maintain optimum bone density with ingredients that support the delivery and retention of calcium in your bones. **Ultimate Bone Support / Bone Benefits™** combines three important forms of Calcium (Citrate, Aspartate and Carbonate) with Boron and Vitamin D to maximize availability, solubility, absorption and utilization. Preliminary research on Boron suggests that it may help reduce calcium loss from bone when combined with other nutrients such as Vitamin D. Soy has been a staple food in the healthy Asian diet for centuries and contains phytonutrients that have long been associated with the support of women's health. **Ultimate Bone Support / Bone Benefits™** contains an ultra-high (forty percent) standardization of Soy isoflavones from Novasoy™. Phytoestrogens from Soy foods may decrease bone loss through their estrogen enhancing actions. Ipriflavone is an isoflavone derived from Soy and has been included in **Ultimate Bone Support / Bone Benefits™** because it has been shown to have unique and beneficial effects on bone health. It has been widely used and studied in Europe for over 10 years and its powerful support of bone health has been demonstrated in several clinical studies. Ipriflavone supports calcium utilization and bone mineralization and can also slow the cells which break down bone. In short, Ipriflavone can support bone mass and contribute to overall skeletal integrity.

Respectfully Submitted,

Rob Maltas
Director, Product Development

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