

GENERAL VITAMIN CORP

PO Box 1500 Chapel Hill NC 27516
919-929-5785 fax 919-929-2458

MAR 16 A7:11

February 20, 2001

CERTIFIED MAIL
Return Receipt Requested

74641

FEB 29 2001

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

To Whom it May Concern,

This letter is submitted pursuant to Section 406 (r)(6) of the Federal Food, Drug, and Cosmetic Act for the purpose of notifying the agency of statements being made in connection with the marketing of dietary supplements being distributed by this company.

The product name and the dietary ingredients for which the statement is being made is as follows:

Beta Carotene	Vitamin A (as beta-carotene)	25000 IU	Other ingredients: Soybean oil, gelatin, vegetable shortening (partially hydrogenated soybean oil), yellow beeswax, hydrogenated soybean oil, lecithin.
Vitamin E 400 IU	Vitamin E (as dl-alpha tocopheryl Acetate)	400 IU	Other ingredients: Gelatin, glycerin, soybean oil
Vitamin E 1000 IU	Vitamin E (as dl-alpha tocopheryl Acetate)	1000 IU	Other ingredients: gelatin, glycerin, soybean oil
Natural Vitamin E 400 IU	Vitamin E (as d-alpha tocopherol acetate)	400 IU	Other ingredients: gelatin, soybean oil, glycerin
Echinacea 500mg	Echinacea Purpurea (herb and Herbal extract)	500mg	Other ingredients: Gelatin, magnesium stearate

97S 0162

LET 7333

The text of the statements that are being made in regards to the above stated product are listed below:

Beta Carotene

- Boost your eyesight and fight free radicals
- Especially beneficial for night vision, vitamin A is essential for normal functioning of your eyes
- It's also used by the body for bone growth and sexual functioning, and healthy tissue

Vitamin E

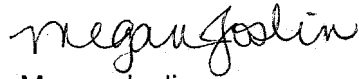
- protect your cardiovascular system
- an antioxidant that also promotes circulation and is essential to overall good health

Echinacea

- Echinacea, your all-season pal
- Scientific reports indicate that echinacea can help promote the production of white blood cells by the immune system
-enhance the immune system

Sincerely,

GENERAL VITAMIN CORP.



Megan Joslin

Product Development Coordinator