

December 12, 2002

Office of Special Nutritionals (HFS-450) 0291 '03 JAN 23 P2:04
 Center for Food Safety and Applied Nutrition
 U. S. Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740-3835

DEC 17 2002

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Probiotic Pearls™	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidbacterium longum	Unique "pearl" delivery system provides L acidophilus and B. longum to increase healthy intestinal flora.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

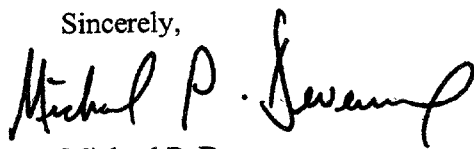
By: Robert Doster
 Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 12/12/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux
 Chief Financial Officer

Probiotic Pearls 14p

82851

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