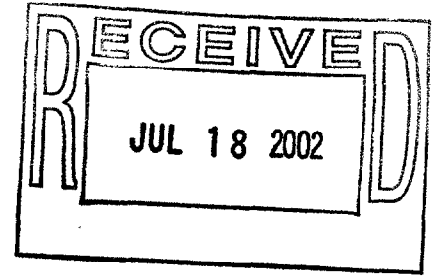


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July 12, 2002

 Office of Special Nutritionals (HFS-450)  
 Center for Food Safety and Applied Nutrition  
 U. S. Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740-3835


RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica 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.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	Our chondroitin sulfate has an average molecular weight less than 16,000 daltons – less than half the molecular weight of most chondroitin products. This results in improved absorption.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

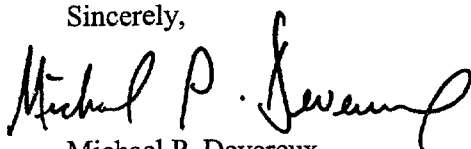
 By:   
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

 Date: 7/12/02

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

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 GREEN BAY, WI 54311-8328  
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 TOLL FREE 800-553-2370  
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 WWW.PHYTOPHARMICA.COM