



Deer & Brown Dog Ticks  
Termites

**STUDY APPLICATION RATE (min):** Variable

**LABEL APPLICATION RATE (min):** 0.03% Soln. applied qualitatively

**Transmittal Documents Cited  
(Contain no Data)**

40591300  
41910800  
41931900  
42102600  
43858600  
44191400  
44760100  
45241700  
45735700  
46275900

**Irrelevant Studies Cited**

40591303  
41931908  
41931909  
45229501  
45241701  
45241702  
45735701  
45735702

**STUDY SUMMARIES:**

The cited studies were previously reviewed. The data contained within the relevant cited MRIDs were considered to support the application rate, sites, and pests listed on the label of the product for which the data were previously reviewed. Thus, the data were considered to support the same label claims on the subject registration. Because the subject formulation is an RTU spray and no quantitative application volumes are provided on the label, the concentration of active ingredient in the test and subject formulation must be equivalent (*i.e.*, 0.03%). The rate of application for the subject registration is acceptable (0.03% versus 0.5% diluted 2:128 or 4:128 with water).

**ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:**

The pests and minimum application rates listed on the proposed product label are generally acceptable, except as noted:

1. A claim against German cockroaches (up to 5 months) and crickets (up to 7 months), both on non-porous surfaces only, is acceptable based upon the data in MRID 46455804, which was found to support residual claims.
2. Residual data cited for other pests have been reviewed and found to support claims of up to 2 months. Remove claims exceeding 2 months, except as noted in #1 above.
3. Claims against termites must be clarified as follows:

Under the sections How to apply, revise to read "Apply as a coarse spray to thoroughly and uniformly wet ~~the infested~~ areas that are likely infested."

Enclosure  
000100-0RETU S803944-ER