

AUG 17 1992

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Mr. Joseph E. Dyer
Coopers Animal Health Inc.
1201 Douglas Avenue
Kansas City, KS 66103-1438

Dear Mr. Dyer:

Subject: Amendment - Addition of Efficacy Claims
EXspot for Dogs
EPA Registration No. 59-231
Your Submission Dated March 12, 1992

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA sec. 3(c)(5) or FIFRA sec. 4 when the Agency requires all registrants of similar products to submit such data.

2. Please note that the language for the Statement of Practical Treatment should appear as indicated in our letter dated April 8, 1992.

3. Submit five copies of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager 13
Insecticide-Rodenticide Branch
Registration Division (H7505C)

CONCURRENCES

SYMBOL	Enclosure						
SURNAME	GA						
DATE	8/14/92						

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DRAFT LABEL
FRONT PANEL

Contains: Two Ice Applicators



Kills and Repels Mosquitoes
Aids in Prevention of Blood Feeding by Mosquitoes
(Vector of HEARTWORM) up to 4 Weeks

EXspot[®] INSECTICIDE FOR DOGS

Kills & Repels Fleas up to 4 Weeks

Kills & Repels Deer Ticks (*Ixodes dammini*)
Vector of LYME DISEASE up to 4 Weeks

Kills & Repels Brown Dog Ticks
(*Rhipicephalus sanguineus*) up to 4 Weeks

Kills & Repels American Dog Ticks
(*Dermacentor variabilis*) for 2 to 3 Weeks

Contains: Two Ice Applicators

Active Ingredient	
Permethrin (3-phenoxyphenyl) methyl (±)-cis-	
trans-3-(2,2-dichloroethyl)-2,2-dimethyl-	
propionocarbonylate	65%
Inert Ingredients	35%
** cis/trans ratio:	
Max 55% (±) cis and min 45% (±) trans	
100%	

KEEP OUT OF REACH OF CHILDREN
CAUTION
SEE INSIDE PANEL FOR A ADDITIONAL
PRECAUTIONARY STATEMENTS

BEST AVAILABLE COPY

ACCEPTED
with COMMENTS
in EPA Letter Dated

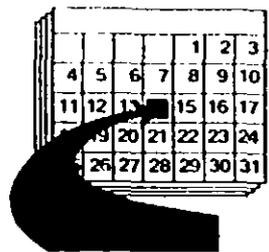
AUG 17 1992

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

59-231

PANTONE
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J.E. Dyer
Page 1 of 3
March 12, 1992



DRAFT LABEL
INSIDE PANEL

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. **DO NOT USE ON CATS.** Cats which actively groom or engage in close physical contact with recently treated dogs are at risk of toxic exposure.

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger or, if available, by administering syrup of ipecac. Do not induce vomiting or give anything by mouth to an unconscious person. **If On Skin:** Remove contaminated clothing and wash with plenty of soap and water. **If In Eyes:** Flush eyes with plenty of water. Call a physician if irritation persists. **Adverse Reactions:** An uncommon but reported reaction in dogs has been skin sensitivity. Dogs may show lethargy, increased pruritus, erythema, rash and hair loss at the application site. If sensitivity to EXspot insecticide occurs, discontinue use and bathe the dog. Seek Veterinary advice.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not add directly to water. Do not contaminate by disposing of equipment washwaters.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a cool, dry place. **Pesticide Disposal:** Securely wrap original container in several layers of newspaper and discard in trash. **Container Disposal:** Do not reuse empty container. Wrap container and put in trash.

EXspot insecticide is an effective and easy to use product. EXspot insecticide demonstrates greater than 95% control of fleas within 3 days of application. As with all flea and tick control products, EXspot insecticide should be used as part of a control program aimed at reducing flea populations in the dog's environment (bedding, carpets, kennel, yard). Consult your veterinarian or entomologist for program recommendations. If necessary, repeat applications may be made, but do not apply at intervals less than 7 days. Do not use on dogs less than 6 months of age.

DO NOT USE ON CATS.

NOTICE OF WARRANTY

COOPERS ANIMAL HEALTH, INC. MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED CONCERNING THIS PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL CONDITIONS IN ACCORD WITH THE STATEMENTS MADE ON THIS LABEL.

BEST AVAILABLE COPY



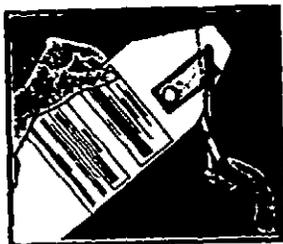
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DRAFT LABEL
BACK PANEL

DIRECTIONS FOR USE



It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label completely before using. **DO NOT USE ON CATS.** May be toxic if applied to or ingested by cats. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

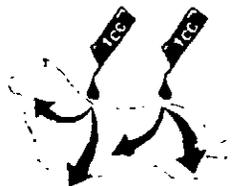


HOW TO APPLY:

Hold card in upright position, cap pointing up and cut along dotted line. Invert card over dog and use point of card to part the hair of dog. Squeeze the tube firmly to apply all of the solution. Wrap container and put in trash.



Dosage for Dogs Weighing Less Than 33 pounds:
Apply 1 (one) cc of EXspot insecticide solution to dog's back between the shoulder blades.



Dosage for Dogs Weighing More Than 33 pounds:
Apply 1 (one) cc of EXspot insecticide solution to dog's back between the shoulder blades and apply 1 (one) cc of EXspot insecticide solution to the dog's back directly above the tail head area.

504441

Lot No



Coopers Animal Health Inc
1201 Douglas Avenue
Kansas City, KS 66103 1438
U.S.A. 15 32 005A



KILLS & REPELS
US Patent No. 4,020,181 - other Patent Pending
EPA Reg. No. 59-231 EPA Est. No. 47179-R-001



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