

28 JAN 1992

Ms. Filomena King
Reckitt & Colman Household Products, Inc.
1655 Valley Road
P.O. Box 941
Wayne, NJ 07474-0941

Dear Ms. King:

Subject: Additional Label Claims: "New Formula"; "Improved
Knockdown [Kill]
Black Flag Flying Insect Killer Formula A
EPA Reg. No. 475-266
Submission dated January 9, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

- 1) We will allow the use of the term "New Formula" for a period of six months in the market after which it should be removed from the label.
- 2) The statement "Improved Knockdown [kill]" is unacceptable since no modifications to this product (EPA Reg. No. 475-266) have been made to effect such a claim. We are disallowing this claim using the same rationale that appeared in the Agency's letter of January 7, 1992 concerning "improved formula". For future reference, comparative label statements such as "Improved" must be made on the basis of comparison data done exclusively on that sole product.
- 3) As new labels are prepared, change the label declaration for sumithrin to read: "3-phenoxybenzyl-(1RS, 3RS; 1RS, 3SR)-2,2-dimethyl-3-(2-methylprop-1-enyl)cyclopropanecarboxylate".

4) Correct the Confidential Statement of Formula
(alternate formula) dated 12/19/91 so that the total
percentage equals 100% instead of 100.20%.

Sincerely,


Richard F. Mountfort
Product Manager (10)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

