

2517-135

09/11/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Kelly R. Hoskins
Director of Regulatory Affairs
Sergeant's Pet Care Products, Inc.
2625 South 158th Plaza
Omaha, NE 68130-1770

SEP 11 2013

Subject: Sergeant's submissions implementing label changes to pet spot-on products
EPA Decision Nos. 478139, 478335, 478142, and 478144

- Sergeant's Fipronil Squeeze-On for Dogs
EPA Reg. No 2517-134
- Sergeant's Fipronil + Methoprene Spot-On for Cats
EPA Reg. No. 2517-135
- Sergeant's Fipronil + Methoprene Squeeze-on for Dogs
EPA Reg. No. 2517-136
- Sergeant's Fipronil Spot-On for Cats
EPA Reg. No. 2517-137

Dear Mr. Hoskins,

The labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is **acceptable**. With this letter, the label requirements listed in the EPA letter "Implementation of Label Changes to Pet Spot-On Products" dated September 30, 2011, are fulfilled. Please submit final printed labels to the Agency within 30 days of the date of this letter. If EPA determines that future mitigation measures are necessary for all pet spot-ons, the Agency will inform registrants and may take regulatory action.

EPA also received your December 21 2012 request to replace the conditional time-limited registrations with unconditional registrations. At this time, EPA does not have enough information to warrant the removal of these conditions of registration. If Sergeant's wishes to remove the time limitations altogether, please submit to the Product Manager an amendment application for each product to change the terms and conditions of the registration. Please include with your submission a written rationale for the removal of the time limitation. As you may remember, the Agency included this time limitation as a condition of registration for your products to allow for the post-market surveillance of these products. Therefore, we recommend that you include in your rationale the following information, along with any additional information or analyses you think would be helpful to the Agency (e.g.; tables, charts, information on stewardship activities, etc...):

- A summary and analysis of the incidents received associated with these products, including information on the following:

- A comprehensive analysis of incident rates per doses distributed;
- An analysis of historical incident trends since the products' release into the marketplace;
- An analysis of historical incident trends by weight range of animal, breed, weight range of product, etc...
- If these products are also registered in the European Union or Canada, information on incident rates per doses distributed and trends in those countries.

Please also note that requests to remove the expiration date condition are not subject to PRIA fees and do not have to be submitted under PRIA. However, these would also not be considered 90-day, fast-track submission in order to allow the EPA enough time to fully evaluate the information provided. After receiving these submissions, the EPA will consider the incidents received since the initial registration; review the information and rationale provided; and make a decision on the request.

In the interim, the time-limited registrations for these products are extended two years from the date of this letter. If registration extension requests are not received prior to that date, the registration of these products will expire. If a review of the previously submitted enhanced incident data indicates that there is a concern with any of these products, EPA may choose to take further regulatory action at that time.

Per the additional requirements of September 30, 2011 letter, you must continue to submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product, along with an analysis of the incidents reported. The quarterly reports are due two months after the quarter ends. Please flag any Confidential Business Information as such. Enhanced incident reporting should be submitted to the Product Manager. Quarterly sales information should be submitted to the attention of Kaitlin Keller, Pesticide Reevaluation Division, Mail Code 7508P.

The following is a list of information that must be included in the quarterly reports for each incident:

- EPA Registration Number
- Product name (brand name)
- Lot #
- Where purchased: internet, store, veterinarian
- Active Ingredient(s)
- Weight range for product

- Date on which incident occurred. (mm/dd/yyyy)
- State in which the incident occurred. (standard 2 letter abbreviation)
- Registrant case #

- Species: dog, cat, other (specify)
- Breed: (as reported by pet owner)
- Age: months or years
- Sex: M, F, or neutered

Weight: pounds

Primary Route of Exposure: dermal, oral, other animal, inhalation, other

Body System: neurological, dermatological, GI, respiratory, ocular, other

Major signs noted with separate column for each sign, using standard terminology

Time to Onset: (hours, days)

Treated by veterinarian: yes or no

First time product used: yes or no

Misuse: use on incorrect species, overdose, too frequent dosing, other (describe)

Any known precondition

EPA Severity Code: death, major, moderate, minor

Outcome: died, recovered, still treated, unknown

Along with the enhanced incident reporting, you must submit an analysis of the incidents seen, to include the following details:

- All incidents should be reported including all minor dermal and ocular irritation reports.
- Summary table for dogs showing number of incidents of each severity code for each route of exposure. Each incident should only be reported once. If one incident has several routes of exposure, the order should be ocular > oral > dermal. In other words, an incident with both oral and dermal exposure would be reported as oral exposure, and an incident with both ocular and oral exposure would be reported as ocular exposure.
- A similar summary table for cats (misuse or secondary exposure) showing number of incidents of each severity code for each route of exposure.
- Summary table for dogs and table for cats showing number of incidents that are believed due to secondary exposure (e.g., multi-pet households).
- A summary table for dogs showing number of incidents for each severity code for these age ranges: <3 months, 3-6 months, 6-9 months, 9-12 months, 1 yr, 2 yr, 3 yr, 4 yr, 5 yr, 6 yr, 7 yr, 8 yr, 9 yr, 10 yr, 11 yr, 12 yr, 13 yr, 14 yr, 15 yr, >15 yr.
- A summary table showing the number of dog incidents for each severity code for each pet weight range on the product label.
- A summary table for dog weight showing number of incidents for each product weight range. This table should show number of incidents in dogs weighing less than that product weight range, number of incidents in dogs in lower half of weight range, number of incidents in dogs in upper half of weight range, and dogs weighing more than the product weight range.
- Table showing number of incidents for each dog breed.
- Table showing number of incidents in dogs for each clinical sign.

- Table showing number of incidents in dogs for each organ system.
- Report aggregate incidents, but do not combine moderate and minor incidents.

Stamped copies of the labels are enclosed for your records. If you have any questions regarding this label, please contact Kaitlin Keller at (703) 308-8172 via email at keller.kaitlin@epa.gov.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7504P)

Enclosure: Labels stamped "Accepted"

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Sergeant's Master Label

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Information in [] is optional.

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FRONT PANEL

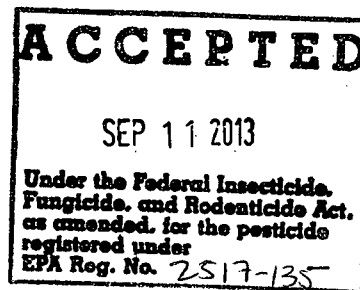
**CAT SPOT ON
FIPRONIL + METHOPRENE**

[Optional text appears in brackets – the final product label may include some or all of the optional text on front, back, side or folded label panels. ~~The CRP required text will not change.~~]

Sergeant's Fipronil + Methoprene Spot-On for Cats

[ABNs:]

- [Sergeant's® Frontier Gold Spot On for Cats]
- [Sergeant's® Frontier Gold for Cats]
- [Sentry® Frontier Gold Spot On for Cats]
- [Sentry® Frontier Gold for Cats]
- [Sergeant's® Ectoadvance Spot On for Cats]
- [Sergeant's® Ectoadvance for Cats]
- [Sentry® Ectoadvance Spot On for Cats]
- [Sentry® Ectoadvance for Cats]
- [Sentry® Proline Spot On for Cats]
- [Sentry® Proline for Cats]
- [SENTRY® FIPROGUARD™ PLUS for Cats]
- [FIPROGUARD™ PLUS for Cats]
- [Sergeant's® PRONYL OTC™ PLUS for Cats]
- [PRONYL OTC™ PLUS for Cats]
- [Sergeant's® AdvanSpot Plus Spot On for Cats]
- [Sergeant's® AdvanSpot Plus for Cats]
- [Sentry® AdvanSpot Plus Spot On for Cats]
- [Sentry® AdvanSpot Plus for Cats]



[For use ONLY on cats [[&] [and] kittens] over 1.5 lbs and over 8 weeks of age] [OR]
[Only for cats [[&] [and] kittens] over 8 weeks of age and over 1.5 lbs]

[Apply to kittens over 8 weeks old]
[Apply to kittens 8 weeks or older]

[Mosquitoes]

[Kills mosquitoes within 24 hours for up to 14 days] [and within 48 hours for up to 28 days]

[Chewing Lice]

[Kills chewing lice]
[Rapid elimination of chewing lice infestation]
[Fast Action against chewing lice infestations]

[Adult Fleas]

[Kills adult fleas [for up to six weeks]]
[Kills Fleas [Up to [4] [6] weeks]!]
[Kills fleas which may be a source of flea allergy dermatitis] [or flea bite anemia]

[Ticks]

[Kills ticks including those that may transmit Lyme disease]
[Kills Ticks for Up to [4 weeks] [1 month] [30 days]!]

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[Kills Deer Ticks (that may carry Lyme disease) for up to [4 weeks] [1 month] [30 days]]
[Kills [brown dog ticks], [(*Rhipicephalus sanguineus*) [American dog ticks,] [and] [lone star ticks],[and deer ticks] [for up to [4 weeks] [1 month] [30 days]]]
[Kills American Dog Ticks [(*Dermacentor variabilis*)] for up to [4 weeks] [1 month] [30 days]!]]

[Multiple Infestations]

[Flea [&] [and] Tick Control for Cats [&] [and] Kittens 8 weeks old and older]
[Kills fleas, flea eggs, ticks, chewing lice [&] [and] [mosquitoes]
[Kills fleas, ticks, [mosquitoes,] chewing lice, flea eggs, [and] flea larvae [and prevents the development of flea pupae]]
[Breaks the Flea Life Cycle]
[Monthly flea, tick, [mosquito,] chewing lice, and flea egg protection]
[Monthly flea, tick, [mosquito] and chewing lice protection]
[Kills fleas, ticks, [mosquitoes,] flea eggs, and chewing lice]
[[Seven] [7] [Six] [6] Way [Action] [Effectiveness] [Control] [kills fleas, ticks, [mosquitoes,] chewing lice, flea eggs, flea larvae and prevents the development of flea pupae]]
[[Six] [6] [Five] [5] Way [Action] [Effectiveness] [Control] [kills fleas, ticks, [mosquitoes,] chewing lice, flea eggs & flea larvae]
[[4 week] [1 month] [30 day] Flea [and] [&] Tick [Application] [Treatment]!]]
[[Four (4) Week] [1 month] [Flea, Tick, [Mosquito] and Chewing Lice Control]
[Use [Brand name][this product] monthly to break the flea life cycle.]
[[Four (4) Week] [1 month] [30 day] [Flea, Tick and Chewing Lice Control]
[Use [Brand name][This product] monthly to control ticks and chewing lice]
[Monthly flea, tick, [mosquito,] flea egg, flea larvae and chewing lice protection.]
[[4 week] [1 month] [30 day] Flea and Tick Treatment!]]
[Once A Month Flea, Tick, [Mosquitoes] [and] [Chewing Lice][Application] [Treatment]]
[Kills Fleas and Ticks for up to [4 weeks] [1 month] [30 days]!]]
[Kills Fleas, Ticks, Flea Eggs & Flea Larvae for up to [4 Weeks] [1 month] [30 days]]
[Brand name][This product provides convenient and effective flea, tick, [and] chewing lice [and] [mosquito] control for cats and kittens over 8 weeks of age]
[Controls reinfestation of fleas for up to six weeks]

[Flea Eggs and Larvae]

[Controls flea reinfestation [for up to six weeks]]
[Kills adult fleas, flea eggs, flea larvae, and prevents the development of pupae [for up to six weeks]]
[Kills all stages of the flea (adult fleas, flea eggs, flea larvae and prevents the development of flea pupae)]
[If cat is at high risk for flea reinfestation apply once a month]
[Kills flea eggs [larvae] [and prevents the development of pupae] for up to six weeks]
[With (S)-methoprene [Insect Growth Regulator] [IGR] which Breaks the Flea Life Cycle]
[With (S)-methoprene to Break Flea Life Cycle]
[With [Insect Growth Regulator] [IGR] to Break Flea Life Cycle]
[Dual Action [!]: Fipronil with (S)-methoprene [insect growth regulator] [IGR] Effectively Breaks the Flea Life Cycle]
[Dual Action [!]: Effectively Breaks the Flea Life Cycle[!]]
[Kills Flea Eggs & Flea Larvae [for up to six weeks]!]]
[Prevents Flea Eggs From Developing Into Biting Adults]

[All Others]

[For Cats and Kittens 8 weeks of age or older]
[Can be used on kittens 8 weeks of age and older]

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[Specially Formulated for Cats and Kittens Over 8 Weeks Old]
 [Fast Acting] [Long Lasting]
 [Easy to Use [Application]]
 [Best if used year round!]
 [Apply monthly]
 [Once a month treatment]
 [Apply once every [4 weeks] [month] [30 days]!]
 [4 Week Dose!] [1 Month Dose!] [30 Day Dose!]
 [One Application][Two Applications][Three Applications][Four Applications][Five Applications][Six Applications][Twelve Applications][24 Applications] and/or [1 Month Supply][2 Month Supply][3 Month Supply][4 Month Supply][5 Month Supply][6 Month Supply][12 Month Supply][24 Month Supply] or [4 Week Supply][8 Week Supply][12 Week Supply][16 Week Supply][20 Week Supply][24 Week Supply][48 Week Supply][52 Week Supply][104 Week Supply]
 [Waterproof]
 [Effective even after bathing]
 [Effective after bathing and exposure to water and sunlight]
 [Can be used on breeding, pregnant and lactating [queens], [female] [cats]]
 [[Free] Calendar Stickers Inside!]
 [Monthly application reminder inside]
 [[Free with purchase] [Free inside] Monthly Application Reminder [Magnet] [clip] [inside]]
 [Fipronil (9.8%) + (S)-methoprene (11.8%)]
 [Contains [the] [same] active ingredient(s) used in [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [Compare to [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products], contains [the] [same] active ingredient(s).*]
 [Compare to [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products], contains [the] [an] [same] active ingredient fipronil.*]
 [Compare to [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products], contains [the] [an] [same] active ingredient (S)-Methoprene.*]
 [Compare to [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products], contains [the] [same] active ingredients fipronil and (S)-Methoprene.*]
 [[Brand Name] [products] [This product] contain(s) fipronil, [the] [an] [same] active ingredient used in [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [[Brand Name] [products] [This product] contain(s) fipronil, compared to [the] [an] [same] active ingredient(s) used in [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [[Brand Name] [products] [This product] contain(s) fipronil and (S)-Methoprene, [the] [same] active ingredients used in [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [[Brand Name] [products] [This product] contain(s) fipronil and (S)-Methoprene, compared to [the] [same] active ingredient(s) used in [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [[*][Brand Name][This product] is not manufactured or distributed by [Merial®] [Company name], the makers of [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].]
 [[Brand Name][This product][Frontline®] [Frontline® TopSpot®] is a registered trademark of [Merial®] [Company name].]
 [[1][2][3][4][5][6][12][24] Applications]
 [Stops and prevents infestation of listed pests for [4 weeks][1 month]]

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[Lift [here] for more information]

ACTIVE INGREDIENTS:

Fipronil	9.80%
(S)-methoprene	11.80%
OTHER INGREDIENT:	78.40%
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [Back] [or] [Side] [Label[s]] [Panel[s]] for Additional Precautionary Statements

Net Contents: X fl oz [Y – 0.017 fl oz (0.50 mL) applicator(s)]

[1] [One] [2] [Two] [3] [Three] [4] [Four] [5] [Five] [6] [Six] [12] [Twelve] [24] [Twenty-Four]

{END - FRONT PANEL}

BACK-PANEL/SIDE-PANEL

**CAT SPOT ON
FIPRONIL+METHOPRENE**

[[Brand name][This product] contains Fipronil and S-Methoprene (insect growth regulator) (IGR) to effectively kill fleas (all stages) and ticks [(including those that may transmit Lyme disease)]. [The active ingredients in [Brand name][this product] feature a sustained release formula developed for fast acting [and long lasting] control of fleas, ticks, [mosquitoes] and chewing lice for [1 month][4 weeks] on cats only.]

READ ENTIRE LABEL BEFORE EACH USE

USE ONLY ON CATS AND KITTENS OVER 8 WEEKS OF AGE

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS. CAUTION. Harmful if swallowed. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

HAZARDS TO DOMESTIC ANIMALS. For external use on cats only. Individual sensitivities, while rare, may occur after using any pesticide product on cats. Certain medications can interact with pesticides. Do not treat your cat with more than one pesticide product at a time. Over dosing your cat can result in serious illness and even death. Consult a veterinarian before using on medicated, debilitated, or aged cats. Can be used on breeding, pregnant, or lactating [cats] [female cats] [queens]. Consult a veterinarian before using on cats with known organ dysfunction.

FIRST AID	
If swallowed:	Call a poison control center or a doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If in eyes:	Flush eyes with plenty of water. Call a doctor if irritation persists.
If on skin:	Wash with plenty of soap and water. Get medical attention if irritation persists.

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HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-781-4738 for emergency medical treatment information.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **DO NOT ALLOW CHILDREN TO APPLY PRODUCT. TO PREVENT HARM TO YOU AND YOUR CAT, READ ENTIRE LABEL BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY.** Do not use on rabbits or animals other than cats. Do not allow your cat to ingest this product. Do not use on kittens under 8 weeks of age. Do not apply to cats weighing less than 1.5 lbs. Do not double-dose cats. Use entire contents of tube vial on each cat. [Do not split one tube between two cats.] Separate the treated cat from all other cats and dogs for 24 hours after treatment has been applied.

Side Effects: Monitor your cat after application. [Some cats may experience temporary startle effects when any product is applied.] Cats may experience some temporary irritation at the site of product application such as redness, scratching or other signs of discomfort. If signs of sensitivity occur, bathe your cat with a mild soap and rinse with large amounts of water. If these or other side effects occur consult your veterinarian or call 1-800-781-4738. If your cat has an unusual reaction to the initial application, consult a veterinarian before repeating application. The most common signs of incidental ingestion are excessive salivation and foaming at the mouth. If these symptoms occur, immediately feed your cat and continue to monitor your cat for the next 24 hours.

{Outer Packaging}

How to open: Remove product tube(s) [vial] from the package. [Separate one tube from the others.] Hold the tube [vial] with notched end pointing up and away from the face and body. Use scissors to cut off the narrow end at the notches along the line.

How to apply: While holding the cat with one hand, use the other hand to apply the solution. Invert the tube [vial] and use the narrow end to part the cat's hair. Apply contents of one tube [vial] of [Brand name][This product] [as a stripe, starting high on the back of the cat's neck to in front of the shoulder blades] [as a spot between the shoulder blades]. Hold the cat for a few seconds to give the solution time to be absorbed into the cat's coat. When finished, wrap the tube [vial] in paper and put into the trash. Only one applicator per treatment is needed.

FREQUENCY OF APPLICATION

Use [Brand name][this product] monthly for complete control of flea, tick [and] chewing lice [and mosquito] infestations. [Studies show that] [Brand name][this product] kills adult fleas for up to six weeks. Apply monthly if your cat is at high risk for flea reinfestation [, or in a highly infested environment]. Apply monthly to control ticks[,] [mosquitoes] and chewing lice. [Brand name][This product] remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Do not reapply for [30 days] [4 weeks]. [[Brand name][This product] can be used on breeding, pregnant and lactating (queens) (female cats).]

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STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not remove tube from the pack until ready to use. Store in a cool (below 77°F/[25°C]) dry place inaccessible to children and pets. Do not refrigerate. Protect from direct sunlight.

CONTAINER DISPOSAL: If empty: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[**WARRANTY** Read the entire Directions for Use and Warranty before using this Product. By using this product, user or buyer accepts the following warranty. The directions for use of this product are believed to adequate and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Unintended consequences may result because of unknown factors. All such risks shall be assumed by the user or buyer.

Sergeant's is committed to providing high quality products. To the extent consistent with applicable law, Sergeant's makes no warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. To the extent consistent with applicable law, Sergeant's, the manufacturer, or the Seller shall not be liable for indirect, special, incidental or consequential damages. To the extent consistent with applicable law, the exclusive remedy of the user or buyer shall not exceed the purchase price paid.]

[If you have questions or comments about this product, please write: [Sergeant's] [SENTRY] Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399.]

In Case of Emergency, call: 1-800-781-4738
Non-Emergency, call: 1-800-224-PETS (7387)

[Coupon(s) inside or on outside of box]
[Made in USA] [U.S. Patent No. 5,567,429]

[Distributed by:][Manufactured by:]
Sergeant's Pet Care Products, Inc.
Omaha, NE 68138-3710

[BAR CODE AREA]
EPA Reg. No. 2517-135
EPA Est. No. XXXXX-XX-XXX

{END - BACK / SIDE PANEL}

~~START - OPTIONAL PACKAGE COPY OR FOLDED PANEL/FLAP OF FRONT OF PACKAGE~~

[How to Apply - May contain graphics illustrating product use, e.g., cat with a drop falling onto its neck from a vial on front, side, or back carton label and/or applicator labeling.]

[Application Instructions] [Directions for Use]

How to Open:

1. Remove product tube(s) [vial] from the package.
2. [Separate one tube from the others.] Hold the tube [vial] with notched end pointing up and away from the face and body. Use scissors to cut off the narrow end at the notches along the line.

How to Apply:

1. Invert tube over cat and use open end to part cat's hair.

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- 2. Apply contents of one tube [vial] of {Brand Name} [as a stripe, starting high [on] [to] the back of the cat's neck to in front of the shoulder blades] [as a spot between the shoulder blades]. Squeeze tube firmly to apply all of the solution to the cat's skin.]

[Look at the Label (Look at the Label icon) [Easy] 6 Step [Easy] [Spot On] [Squeeze-On] [Topical] Checklist]

- [1] Read the label completely and follow directions
- [2] Weigh your cat
- [3] Do NOT use dog products on cats
- [4] Do NOT treat with more than one pesticide product at a time
- [5] Separate animals after [treatment] [application] to avoid chance of ingestion
- [6] Do NOT split tubes between pets][and use the ENTIRE tube contents]

[Brand Name]

[Monthly reminder card]

[3 Month [Treatment] [Application] Tracker]

[For year round protection apply [Brand name][This product] monthly.]

[Pet's Name (Empty blank for owner to fill in name)]

[First][1st][Second][2nd][Third][3rd][Fourth][4th][Fifth][5th][Sixth][6th][Seventh][7th][Eighth][8th][Ninth][9th][Tenth][10th][Eleventh][11th][Twelfth][12th]













[Dose] [Treatment] [Application](Empty blank for owner to fill in date)(Date: MM/DD/YY)

[calendar stickers with [Brand name][This product] [Place stickers on your calendar as a reminder to reapply [Brand name][This product] in 30 days.]

[Monthly Application Reminder Magnet (image of reminder magnet)]

[Enclosed for your convenience is an application reminder magnet. Push the (reset) button, and the reminder light will blink twice. The reminder tag is now set for 30 days. At the end of 30 days the reminder light will blink, reminding you to reapply [Brand name][This product] . Press the button once and the blinking light will stop. Press the button again and this will reset the timer for another 30 days.]

[Optional graphics below may or may not appear anywhere on finished label]

	Adult Flea	
	Fleas	
	Flea eggs	
	Flea Larvae	
	Flea Pupae	
	Ticks	













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	Brown Dog Tick	
	Deer Tick	
	American Dog Tick	
	Chewing Lice	
	Lone Star Tick	
	Mosquitoes	



[Flea life cycle diagram] [Flea Life Cycle]
{END - OPTIONAL PACKAGE COPY }

TUBE/VIAL LABEL

CAT SPOT ON

FIPRONIL+METHOPRENE

{Front Label}

{Back Label}

<p>{Brand Name} For Cats over 1.5 lbs ≥8wks Fipronil 9.8%, (S)-methoprene 11.8% 0.017 fl oz {label code}</p>	<p>KEEP OUT OF REACH OF CHILDREN CAUTION: Read directions and precautions before using. Use scissors to open. EPA REG. No. 2517-135 {label code}</p>
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{END - TUBE/VIAL LABEL}