



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Ms. Nancy Huebl
Senior Registrations Specialist
Wellmark International
1501 East Woodfield Road, Suite 200 West
Schaumburg, IL 60173

OCT - 6 2011

Subject: Label Amendment (R300)
RF2164-A/T Combo
EPA Reg. No. 2724-811
Submission dated August 25, 2011

Dear Ms. Huebl,

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, is acceptable.

A stamped copy of your label is enclosed for your record. If you have any questions, please call Kevin Sweeney at (703) 305-5063.

Sincerely,

Kevin Sweeney
Richard Gebken
Product Manager 10
Registration Division (7505P)
Insecticides Branch

Enclosure

RF2164 A/T COMBO

[Text for "Dog" must be same size as Brand Name]
 Front Panel - For Use Only on Toy (6-12 lbs.), Small (13-31 lbs.), Medium (32-55 lbs.), Large (56 -80 lbs.), and Extra Large (81 lbs. and over) Dogs
 Front Panel - For Use Only on Dogs 6 months of age or older
 [Flea & Tick [& Mosquito][Treatment] [and] Control]
 Spot-On Flea & Tick Control for Dogs

General Claims:

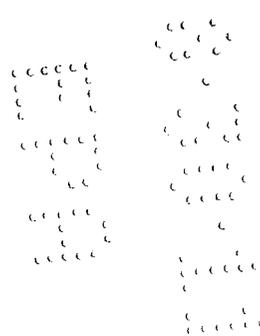
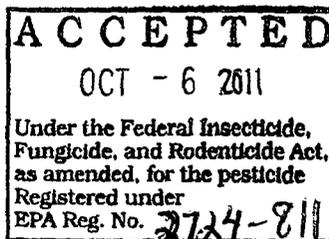
5 size categories provide [smaller] weight ranges to improve [maintain][deliver] efficacy [performance][flea and tick][control][protection] on [for] your dog
 Effective on indoor and outdoor dogs
 ([1][3][4][6] monthly treatments) [1][3][4][6] Months Supply [24][48] doses
 Spreads naturally with dog's movement (skin and hair oils)
 [Formula][Contains lanolin for coat conditioning]
 [Water Resistant] [to keep killing fleas and ticks in humid and wet conditions]
 [Fast Acting][Long Lasting][Kills Fleas and Ticks by Contact]
 [Fresh][Clean][Scent][Smell]
 [Reapply monthly] [Suitable for year-round use][Month] sticker for home calendar
 [Satisfaction guaranteed or your money back]
 [Patent Pending]

Efficacy Claims:

Each tube [cartridge][vial] [application] [kills fleas & ticks for 3 weeks] and [kills and repels mosquitoes for 3 to 4 weeks]
 [Protects for up to [Four/4] Weeks][One month][Four/4 Week [Flea][Tick][Mosquito] Treatment]
 [Aids in Control of Ticks for up to 30 days]
 [Starts Killing Fleas and Ticks within 15 minutes]
 [Kills 85% of ticks within 48 hours][Kills more than 50% of fleas in 2 hours]
 [Dual Action kills adult fleas and prevents flea development]
 [Kills fleas, ticks, mosquitoes, flea eggs and flea larvae] [Dual protection (against fleas and ticks)]
 Kills the Deer Tick, which may transmit Lyme Disease
 Kills and Repels mosquitoes (the major carrier of canine heartworm)
 Monthly application for most effective protection

IGR Claims:

[Contains an Insect Growth Regulator (IGR) to kill flea eggs and prevent flea development for [more than 10 weeks] up to [75 days][2.5 months]]
 [Breaks Flea Life Cycle for [more than 10 weeks] up to [75 days][2.5 months]
 [Controls flea reinfestation for [more than 10 weeks] up to [75 days][2.5 months]
 [With [S-Methoprene] Insect Growth Regulator [IGR] to Break Flea Life Cycle]



Applicator Claims

[New] [applicator]
 [New] contemporary design
 [brand name] [Applicator] helps to prevent getting liquid on [your] hands
 [brand name] [Applicator] tip parts hair to help [liquid][application] get down to [the][your][dog's] skin
 Ergonomically contoured [ergonomic][shape][design] for easy handling [ease of use] [easy use]
 For use with [only][brand name][disposable][liquid dispensing] tubes [vials] [cartridges]
 [brand name] [applicator][has][provides][allows for][delivers] better grip
 [brand name][provides] re-closable [re-sealable] packaging for [easy] storage
 Closing [the][brand name][applicator] door automatically opens the [disposable][liquid dispensing] tube
 [vial][cartridge]
 [brand name] [Applicator] [will not drip after opening]
 [brand name] [Applicator] Won't drip when set down as you go fetch the [your] dog
 Includes unique [brand] applicator
 Puts the liquid on your dog – not your hands
 Directs the liquid onto your dog – not your hands
 Directs the liquid onto your dog – away from your hands
 Applies liquid to your dog's skin – not yours
 Helps prevent applying the wrong spot-on [dose] [product] on [to] the wrong pet
 Convenient, easy to use ACCU-TIP [Applicator] [DISPENSER]
 [Easy to use] Longer applicator tip for easy application to long-haired dogs

Thermoform claims

New
 New [disposable][liquid dispensing] tube [cartridge][vial]
 [New] [brand name][disposable][liquid dispensing] [tube][vial] tip [helps][to] spread out liquid [on your][dog]
 Unique [cartridge] [tube][vial] with flow control
 [no drip][no mess][application][tube][cartridge][vial]

Promotional Package Copy

One month [dose] free
 One free month supply [dose] included
 Bonus pack
 Free [applicator][tube][vial][cartridge][inside]
 Designed not to drip when set on top of the counter, or table, or other flat surface.
 For use with [brand] applicator
 Applicator [device] not included
 [brand] Refill Pack [brand][applicator [device] not included]

Refill Claims

For use [only] with [brand name][Applicator]
 ([1][3][4][6] monthly treatments) [1][3][4][6] Months Supply [24][48] doses
 Easy to use [convenient] refills
 [Can be used with] [Use with] [Brand Name] applicator
 [Brand Name] Applicator [Refills][Refill Pack]
 Refill Pack [for][Brand Name] Applicator
 Refills [Refill Pack] available

Applicator name options (applicator device is used in text)

Applicator
 Tool
 Device
 Applicator Device
 Application Tool



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Thermoform name options (tube, cartridge and vial are used in the text)

- Ampoule
- Cartridge
- Packet
- Pod
- Refill
- Tube
- Vial

ACTIVE INGREDIENTS:

Etofenprox (CAS # 80844-07-1).....	30.0%
S-Methoprene (CAS # 65733-16-6).....	3.6%
Piperonyl Butoxide (CAS # 51-03-6)*	5.0%

OTHER INGREDIENTS: 61.4%

TOTAL **100.0%**

*(butyl carbityl) (6-propylpiperonyl ether) and related compounds

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for [Ingredients and] Additional Precautionary Statements

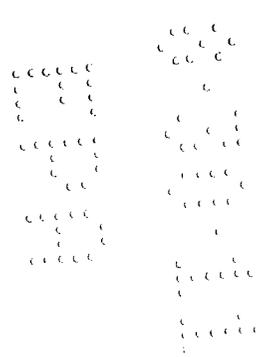
NET CONTENTS:

One: 0.05 fl oz (1.5 cc) [vial][tube][cartridge] (Toy Dogs)/
0.10 fl oz (3.0 cc) [vial] [tube][cartridge] (Small Dogs)/
0.15 fl oz (4.5 cc) [vial][tube][cartridge] (Medium Dogs)/
0.20 fl oz (6.0 cc) [vial][tube][cartridge] (Large Dogs)
0.30 fl oz (9.0 cc) [vial][tube][cartridge] (Extra Large Dogs)

EPA Reg. No. 2724-811

EPA Est. No.

[ICON – DO NOT USE ON CATS]



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SUBLABEL A – APPLICATOR DEVICE PACKAGE

1. DIRECTIONS FOR USE WITH APPLICATOR

RF2164 A/T COMBO

**IMPORTANT! DO NOT Use on Dogs LESS THAN 6 Months OLD
READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS. DO NOT USE ON
OTHER ANIMALS!**

[Back Panel]

DO NOT USE ON CATS

Keep cats away from treated dogs for 24 hours. If applied or ingested, contact your veterinarian immediately.

[RF2164 A/T COMBO] prevents flea eggs from developing into adult fleas [more than 10 weeks] for up to [75 days][2.5 months]. RF2164 A/T COMBO also kills fleas and ticks for 3 weeks and kills and repels mosquitoes for 3 to 4 weeks.]

Effective flea & tick control for your dog.

[brand] provides flea and tick protection for dogs for up to 30-days – and protection from flea reinfestation beyond. That’s because it doesn’t just kill adult fleas and ticks, it also prevents reinfestation by knocking out flea eggs and larvae that could hatch later on. Plus, it kills and repels mosquitoes.

A unique, convenient applicator for you. The new [brand] Applicator is specially designed to make applying flea and tick control easier, more precise -- and neater – than ever before. You simply insert the appropriate [brand] tube [vial][cartridge] for your dog into the applicator, close it and squeeze to apply. The applicator’s ergonomic, contoured shape [design] makes it easy to grip and a built-in fin [tip] [comb] helps to spread [part] the [your] dog’s hair to allow the liquid to more readily [better] reach [apply] the [to] [your dog’s] skin. The tube [vial][cartridge] is sealed inside, so you can be confident that the liquid goes onto your dog – and not your hand. Plus, if the applicator is laid down on a table, counter or other flat surface, it won’t run out or drip.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. [If you choose to apply directly to dog without using the applicator device, read and follow the Directions for Use For Direct Application to Dog on this package.]

USE RESTRICTIONS:

Apply this product once every 30 days unless a retreatment is necessary. Do not make the retreatment sooner than 8 days after the initial treatment. Do not retreat more than once per month.

RF2164 A/T COMBO works by application directly to the dog’s skin, not to the hair. When applying, use applicator device tip to push aside dog’s hair to allow direct application to the skin. Do not get this product in dog’s eyes or mouth.

[(Note: Application now assumes one tube[vial][cartridge] per dog per application)]

The RF2164 A/T COMBO provides a unique applicator device that allows dog owners to treat their dogs more securely, and dispose of liquid cartridges [tubes][vials]with less mess.

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]

[Note: This label contains alternate, independent sets of Directions For Use, which are provided to allow for flexibility in device manufacturing. Each set of DFU has the same 6 steps: Open, Load, Close, Apply, Dispose, Use Restrictions, so the minor differences relate to device features. Potential icon designs are on the last pages of this document.

Text appearing on icon pages is for illustrative purposes only and does not represent full text as indicated in DFU which will appear on label.]

[DFU Set No. 1]

FOR [TOY][SMALL][MEDIUM] SIZE DOGS

To apply the [RF2164 A/T COMBO] treatment, use one disposable liquid cartridge [tube][vial][for each application] with the applicator device.

1. OPEN [icon]

Holding the applicator device in one hand, push the side [buttons] to open the device.

2. LOAD [icon]

Place one disposable liquid cartridge [vial][tube] in the applicator device, ensuring that the cartridge [vial][tube] fits securely in the slots inside the applicator device.

3. CLOSE [icon]

Point the applicator device tip upward and close the lid. The disposable [liquid] cartridge [vial][tube] will automatically be clipped open and is now ready to be applied to your dog.

4. APPLY [icon]

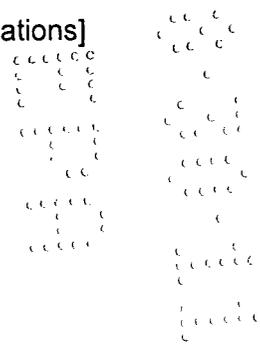
The dog should be standing for easy application. Apply RF2164 A/T COMBO evenly to [two spots](toy dogs)[three spots](small dogs)(medium dogs) on the top of the back from the shoulder to the base of the tail. At each spot, use the tip of the applicator device to part the hair until the skin is visible. Then push down on the round [circle][button][thumb pad] to dispense a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog. Do not spread RF2164 A/T COMBO by hand over the dog. Although the dog's skin and hair oils will naturally distribute the application over the entire dog, brushing the dog 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon]

When finished, hold applicator device over trash. Push side [buttons together] to open applicator device door and discard empty cartridge [tube][vial] into trash or offer for recycling if available. [Close applicator device door and store [applicator device] in original package.]

6. USE RESTRICTIONS: Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month.

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]



FOR [LARGE][EXTRA LARGE] DOGS

- 1 ...
- 2 ...
- 3 ...

4 The dog should be standing for easy application. Apply RF2164 A/T COMBO evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, use the tip of the applicator device to part the hair until the skin is visible. Then push down on the round [circle][button][thumb pad] to dispense a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog. Do not spread RF2164 A/T COMBO by hand over the dog. Although the dog's skin and hair oils will naturally distribute the application over the entire dog, brushing the dog 12-24 hours after treatment will help to distribute the material over the skin.

- 5 ...
- 6 ...

[DFU Set No. 2]

FOR [TOY][SMALL][MEDIUM] SIZE DOGS

To apply the [RF2164 A/T COMBO] treatment, use one disposable liquid cartridge [tube][vial] [for each application] with the applicator device.

1. OPEN [icon]

With [color] door facing downward, push side [buttons] to open applicator.

2. LOAD [icon] (3 alternate statements)

-[To Load, insert tube [cartridge][vial] [color side down][white side up]. Press down on tube [cartridge][vial] until [two [color]] tabs click in place].

-[To Load, place tube[cartridge][vial] under the [color, e.g. green] tabs] [in the applicator]

-[To Load, place tube[cartridge][vial] white side up into the applicator]

[Ensure that tube [cartridge][vial] fits securely in the applicator.]

3. CLOSE [icon]

Point tip up and close the [color, e.g. green] door. The tube [cartridge][vial] will snap open and is now ready to apply.

4. APPLY [icon]

The dog should be standing for easy application. To Apply, Use tip to part hair and get next to dog's skin. [Press circle on [color] door] [Press round thumb pad] once at each of [two] (Toy dogs) [three] (Small Dogs)(Medium dogs) evenly placed spots between the shoulder and the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog. Do not spread RF2164 A/T COMBO by hand over the dog. Although the dog's skin and hair oils will naturally distribute the application over the entire dog, brushing the dog 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon]

Push side [buttons] to open door and drop empty tube [vial][cartridge] into trash or offer for recycling if available. [Close applicator device door and store in original package.]

6. USE RESTRICTIONS

Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month.

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]

FOR [LARGE][EXTRA LARGE] DOGS

- 1 ...
- 2 ...
- 3 ...
- 4 APPLY [icon]

The dog should be standing for easy application. To Apply, Use tip to part hair and get next to dog's skin. [Press circle on [color] door][Press round thumb pad] once at each of four or five [evenly placed] spots between the shoulder and the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog. Do not spread RF2164 A/T COMBO by hand over the dog. Although the dog's skin and hair oils will naturally distribute the application over the entire dog, brushing the dog 12-24 hours after treatment will help to distribute the material over the skin.

- 5 ...
- 6 ...

[DFU Set No. 3]

FOR [TOY][SMALL][MEDIUM] DOGS

To apply the [RF2164 A/T COMBO] treatment, use one disposable liquid cartridge [tube][vial] [for each application] with the applicator device.

1. OPEN [icon]

Use finger scoop to lift open door.

2. LOAD [icon] (2 alternate statements)

- [To Load, place tube [cartridge][vial] under the [color, e.g. green] tabs][in the applicator]
- [To Load, place tube [cartridge][vial] white side up into the applicator]
- [Ensure that tube [cartridge][vial] fits securely in the applicator.]

3. CLOSE [icon]

Close the [color, e.g. green] door and the tube will snap open.

4. APPLY [icon]

The dog should be standing for easy application. To apply, use tip to part hair and get next to dog's skin. Press [circle] [[round] thumb pad] on [color] door once at each of [two] (Toy dogs) [three] (Small Dogs) (Medium dogs) evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog. Do not spread RF2164 A/T COMBO by hand over the dog. Although the dog's skin and hair oils will naturally distribute the application over the entire dog, brushing the dog 12-24 hours after treatment will help to distribute the material over the skin.

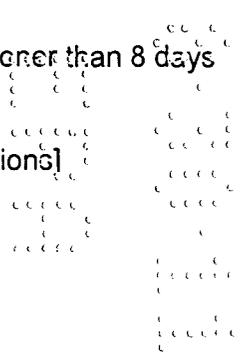
5. DISPOSE [icon]

To dispose of empty tube, open [color, e.g. green] door and drop empty tube into trash or offer for recycling if available. [Close applicator device door and store in original package.]

6. USE RESTRICTIONS

Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month.

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]



FOR [LARGE][EXTRA LARGE] DOGS

- 1 ...
- 2 ...
- 3 ...
- 4 APPLY [icon]

The dog should be standing for easy application. To apply, use tip to part hair and get next to dog's skin. Press [circle] [[round] thumb pad] on [color] door once at each of four or five evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog. Do not spread RF2164 A/T COMBO by hand over the dog. Although the dog's skin and hair oils will naturally distribute the application over the entire dog, brushing the dog 12-24 hours after treatment will help to distribute the material over the skin.

- 5 ...
- 6 ...

RF2164 A/T COMBO is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs with RF2164 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.] [RF2164 A/T COMBO is water resistant and remains efficacious following exposure to rainfall or swimming.]

[TREATMENT SCHEDULE			
Dosage: 1 [cartridge] [tube][vial] every 30 days per dog			
Pet's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

Reminder: I purchased RF2164 A/T COMBO from: _____

NOTES: _____

Treatment table can be expanded based on package size. (6 months)]

STORAGE and DISPOSAL: . **Pesticide Storage:** Store in a cool area away from children and animals. Liquid Cartridge [vial][tube] **Disposal: If empty:** Do not reuse cartridge [vial] [tube]. Place in trash or offer for recycling if available. **If partially filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION

DO NOT USE ON DOGS LESS THAN 6 MONTHS OLD. For external use only. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to etofenprox can cause skin irritation. Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing, or animals on medication. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. Some pets may experience hair loss or temporary skin irritation at the application site. If signs persist or become more severe, contact veterinarian immediately and report incident to company at 1-800-XXX-XXXX.

FIRST AID	
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing • Call a poison control center or doctor for treatment advice.
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-XXX-XXXX for emergency medical treatment information.	

WARRANTY AND CONDITIONS OF SALE:

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-xxx-xxxx or contact your veterinarian if your pet is experiencing an adverse event.

Wellmark International
1501 E. Woodfield Road. 200W
Schaumburg, Illinois 60173

[URL]

Made in USA

TEXT FOR LIQUID TUBE/CARTRIDGE/VIAL

Product name

Etofenprox 30%, (S)-Methoprene 3.6%, Piperonyl Butoxide 5%

KEEP OUT OF REACH OF CHILDREN

CAUTION

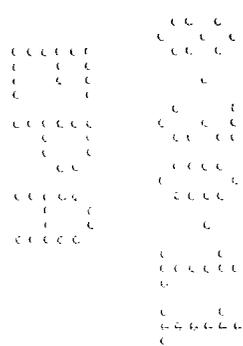
READ DIRECTIONS BEFORE USING

EPA Reg. No. 2724-811

Net Contents

[ICON – DO NOT USE ON CATS]

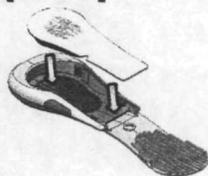
For Use Only on Toy (6-12 lbs.), Small (13-31 lbs.), Medium (32-55 lbs.), Large (56 -80 lbs.), and Extra Large (81 lbs. and over) Dogs 6 months of age or older



Alternate Sets of ICONS for the RF2164 A/T COMBO

[ICON SET 1]
[OPEN]

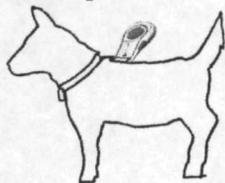
[LOAD]



[CLOSE]



[APPLY]



[DISPOSE]



[ICON SET 2] ALTERNATE ICONS FOR DIRECTIONS FOR USE (will be specific to dog's size)

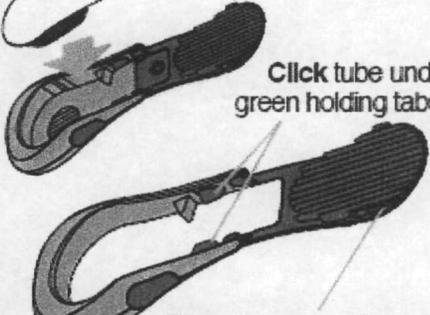
With green door facing down
Push two side buttons
to OPEN door



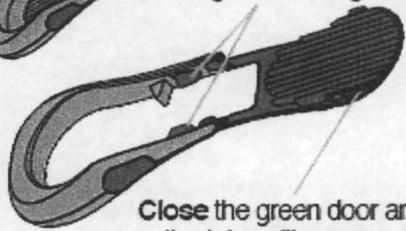
To LOAD Place tube with
WHITE side UP into applicator



Click tube under
green holding tabs.



Close the green door and
the tube will snap open.



To APPLY Use Tip to part fur
and get next to dog's skin.
Press circle on green door
once at each of # spots
between shoulders
and tail

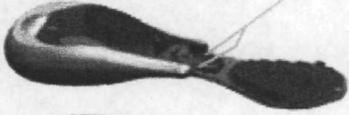


DISPOSE of empty tube
Push two side buttons to
open green door and
drop empty tube
into trash



("#Spots" is a variable dependent on size)
Door color may change based on brand.
(Alternate LOAD icon)

To LOAD place tube WHITE side UP
under the green tabs

CLOSE the green door
and the tube will snap open.

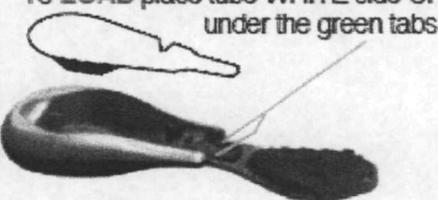



[ICON SET 3] ALTERNATE ICONS FOR DIRECTIONS FOR USE (will be specific to dog's size)

Use finger scoop to lift OPEN door



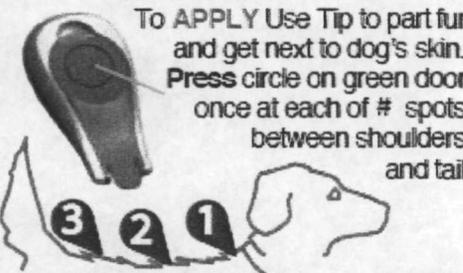
To LOAD place tube WHITE side UP under the green tabs



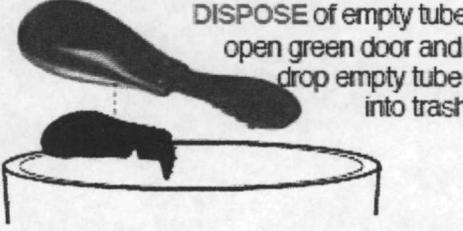
CLOSE the green door and the tube will snap open.



To APPLY Use Tip to part fur and get next to dog's skin. Press circle on green door once at each of # spots between shoulders and tail



DISPOSE of empty tube open green door and drop empty tube into trash



("#Spots" is a variable dependent on size)
Door color may change based on brand.



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2. DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG

USE RESTRICTIONS:

Apply this product once every 30 days unless a retreatment is necessary. Do not make the retreatment sooner than 8 days after the initial treatment. Do not retreat more than once per month.

RF2164 A/T COMBO works by application directly to the dog's skin, not to the hair. When applying, manually push aside dog's hair to allow direct application to the skin. Do not get this product in dog's eyes or mouth.

[(Note: Application now assumes one applicator per animal per application)]

[Note: Each package contains sufficient tubes/applicators for [X] applications]

FOR [TOY][SMALL][MEDIUM] SIZE DOGS

1. Bend at perforation and tear off first applicator [tube]. [
2. Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.] Hold applicator [tube] upright and snap tip back, away from face and body.
3. The dog should be standing for easy application. Apply RF2164 A/T COMBO evenly to [two spots](toy dogs)[three spots](small or medium dogs) on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog.
4. Do not spread RF2164 A/T COMBO by hand over the dog. Although the dog's skin and hair oils will naturally distribute the application over the entire dog, brushing the dog 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty [tube][applicator] as described in Storage and Disposal
6. Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month.

[Note: Each package contains sufficient tubes/applicators for [X] applications]

FOR [LARGE][EXTRA LARGE] DOGS

1. Bend at perforation and tear off first applicator [tube].
2. Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.] Hold applicator [tube] upright and snap tip back, away from face and body
3. The dog should be standing for easy application. Apply RF2164 A/T COMBO evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog.
4. Do not spread RF2164 A/T COMBO by hand over the dog. Although the dog's skin and hair oils will naturally distribute the application over the entire dog, brushing the dog 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty [tube][applicator] as described in Storage and Disposal
6. Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month.

RF2164 A/T COMBO is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

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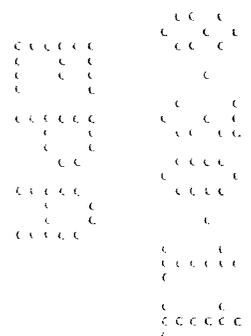
[The successive feeding activity of fleas on dogs may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs with RF2164 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.] [RF2164 A/T COMBO is water resistant and remains efficacious following exposure to rainfall or swimming.]

[TREATMENT SCHEDULE Dosage: 1 [cartridge] [tube][vial] every 30 days per dog			
Pet's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

Reminder: I purchased RF2164 A/T COMBO from: _____

NOTES: _____

Treatment table can be expanded based on package size. (6 months)]



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SUB-LABEL B FOR REFILLPACKAGE

(For use with applicator device or direct application to dog without applicator device)

(Front Panel)

[Product Name]

[Flea & Tick [& Mosquito][Treatment] [and] Control]

Spot-On Flea & Tick Control for Dogs

ACTIVE INGREDIENTS:

Etofenprox (CAS # 80844-07-1)..... 30.0%

S-Methoprene (CAS # 65733-16-6)..... 3.6%

Piperonyl Butoxide (CAS # 51-03-6)* 5.0%

OTHER INGREDIENTS: 61.4%

TOTAL **100.0%**

*(butyl carbityl) (6-propylpiperonyl ether) and related compounds

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for [Ingredients and] Additional Precautionary Statements

EPA Reg. No. 2724-811

EPA Est No.

NET CONTENTS:

One: 0.05 fl oz (1.5 cc) [vial][tube][cartridge] (Toy Dogs)/

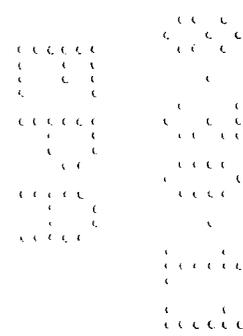
0.10 fl oz (3.0 cc) [vial] [tube][cartridge] (Small Dogs)/

0.15 fl oz (4.5 cc) [vial][tube][cartridge] (Medium Dogs)/

0.20 fl oz (6.0 cc) [vial][tube][cartridge] (Large Dogs)

0.30 fl oz (9.0 cc) [vial][tube][cartridge] (Extra Large Dogs)

[ICON – DO NOT USE ON CATS]



17
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(Back Panel)

IMPORTANT! DO NOT Use on Dogs LESS THAN 6 Months OLD
READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS. DO NOT USE ON OTHER ANIMALS!

[Back Panel]

DO NOT USE ON CATS

Keep cats away from treated dogs for 24 hours. If applied or ingested, contact your veterinarian immediately.

[RF2164 A/T COMBO] prevents flea eggs from developing into adult fleas [more than 10 weeks] for up to [75 days][2.5 months]. RF2164 A/T COMBO also kills fleas and ticks for 3 weeks and kills and repels mosquitoes for 3 to 4 weeks.]

[Effective flea & tick control for your dog.

[brand] provides flea and tick protection for dogs for up to 30-days – and protection from flea reinfestation beyond. That’s because it doesn’t just kill adult fleas and ticks, it also prevents reinfestation by knocking out flea eggs and larvae that could hatch later on. Plus, it kills and repels mosquitoes.]

[Note: full directions for use to be used if space allows]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

[To apply the RF2164 A/T COMBO treatment with the [Brand Name] applicator, use one disposable liquid cartridge [tube][vial][for each application] with the applicator device.]

[Remove one refill tube [cartridge][vial] from the package and insert into opened [brand name] applicator device. Make application according to label directions supplied with the [brand name] applicator device.] If you need directions for application, please call 1-800-XXX-XXXX.

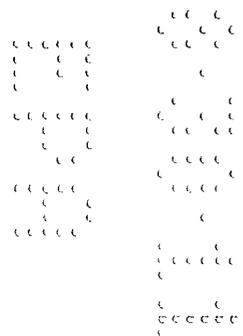
[However, if you choose to apply directly to dog without using the applicator device, read and follow the Directions for Use For Direct Application to Dog on this package.]

(DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG)

[USE RESTRICTIONS:

Apply this product once every 30 days unless a retreatment is necessary. Do not make the retreatment sooner than 8 days after the initial treatment. Do not retreat more than once per month.

RF2164 A/T COMBO works by application directly to the dog's skin, not to the hair. When applying, manually push aside dog's hair to allow direct application to the skin. Do not get this product in dog's eyes or mouth.



[(Note: Application now assumes one applicator per animal per application)]

[Note: Each package contains sufficient tubes/applicators for [X] applications]

FOR [TOY][SMALL][MEDIUM] SIZE DOGS

1. Bend at perforation and tear off first applicator [tube]. [
2. Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.] Hold applicator [tube] upright and snap tip back, away from face and body.
3. The dog should be standing for easy application. Apply RF2164 A/T COMBO evenly to [two spots](toy dogs)[three spots](small or medium dogs) on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog.
4. Do not spread RF2164 A/T COMBO by hand over the dog. Although the dog's skin and hair oils will naturally distribute the application over the entire dog, brushing the dog 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty [tube][applicator] as described in Storage and Disposal
6. Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month.

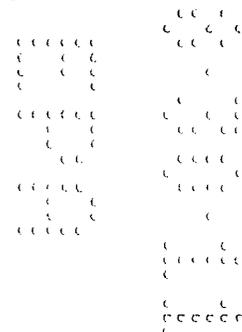
[Note: Each package contains sufficient tubes/applicators for [X] applications]

FOR [LARGE][EXTRA LARGE] DOGS

1. Bend at perforation and tear off first applicator [tube].
2. Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.] Hold applicator [tube] upright and snap tip back, away from face and body
3. The dog should be standing for easy application. Apply RF2164 A/T COMBO evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog.
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5. Discard empty [tube][applicator] as described in Storage and Disposal
6. Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month.

RF2164 A/T COMBO is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs with RF2164 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.] [RF2164 A/T COMBO is water resistant and remains efficacious following exposure to rainfall or swimming.]



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[TREATMENT SCHEDULE Dosage: 1 [cartridge] [tube][vial] every 30 days per dog			
Pet's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

Reminder: I purchased RF2164 A/T COMBO from: _____
 NOTES: _____
 Treatment table can be expanded based on package size. (6 months)]]

(Precautionary/First Aid and Storage/Disposal) text included)

WARRANTY AND CONDITIONS OF SALE:

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-xxx-xxxx or contact your veterinarian if your pet is experiencing an adverse event.

Wellmark International
 1501 East Woodfield Road 200W
 Schaumburg, Illinois 60173

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