



U.S. ENVIRONMENTAL PROTECTION AGENCY
 Office of Pesticide Programs
 Registration Division (7505P)
 1200 Pennsylvania Ave., N.W.
 Washington, D.C. 20460

EPA Registration No.
2724-826

Date of Issuance:
NOV 8 2012

NOTICE OF PESTICIDE:

- Registration
- Reregistration

(under the Federal Insecticide, Fungicide,
 and Rodenticide Act, as amended)

Term of Issuance:
Conditional Registration
Expires November 8, 2014

Name of Pesticide Product:
RF2181 KD A/T Combo

Name and Address of Registrant (include ZIP Code):
Wellmark International
1501 E. Woodfield Road
Suite 200 West
Schaumburg, IL 60173

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(a) provided that:

1. This registration is time-limited and expires two years from the date this product is first released for shipment.

 You must provide the Agency with a projected release for shipment date within 30 days of the date of this Notice of Registration. The Agency will calculate the expiration date based on the projected release for shipment date until an actual release for shipment date is provided in writing.
2. The basic Confidential Statement of Formula (CSF) dated May 25, 2012 is the CSF of record and supersedes all previously accepted CSFs.
3. Make the following changes to the label:
 - a. Revise the EPA Registration Number to read: "EPA Registration No. 2724-826".
 - b. Place a large, clear picture of a dog in the weight range for the product as packaged on the front panel of the label.
 - c. Remove the words "natural" and "naturally" wherever they appear on the label.

- 4. You must submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product for the quarter that begins on January 1, 2013. 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 Registration Division, Immediate Office (attn: Kimberly Nesci).

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

- 5. 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.

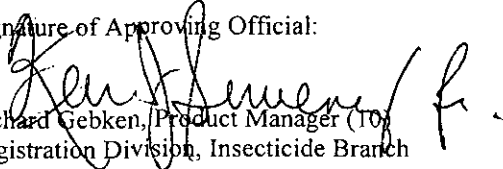
- A similar summary table for cats (misuse or secondary exposure) showing number of incidents of each severity code for each route of exposure.
 - Summary table for dogs and table for cats showing number of incidents that are believed due to secondary exposure (e.g., multi-pet households).
 - A summary 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.
6. You must submit and/or cite all data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data, and submit acceptable responses required for reregistration of your product under FIFRA section 4.
7. The acute toxicity profile for this product is as follows:

Route of Exposure	Toxicity Category
Acute oral toxicity	IV
Acute dermal toxicity	IV
Acute inhalation toxicity	IV
Primary eye irritation	III
Primary skin irritation	IV
Dermal sensitization	Non-sensitizer

A stamped copy of the label and copies of the Data Evaluation Records (DERs) are included for your file. Two copies of the finished labeling must be submitted prior to releasing the product for shipment. 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.

If EPA determines that future mitigation measures are necessary for all pet spot-ons, the Agency will inform registrants. If mitigation measures are necessary, EPA may take regulatory action. If you have any questions concerning this registration, please contact Kevin Sweeney at (703) 305-5063.

Signature of Approving Official:


Richard Gebken, Product Manager (10)
Registration Division, Insecticide Branch

Date:

NOV - 8 2012

Enclosure

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/puppy'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 [pods] [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
 [pod][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/puppy
 Includes unique [brand] applicator
 Puts the liquid on your dog/puppy – not your hands
 Directs the liquid onto your dog [/puppy] – not your hands
 Directs the liquid onto your dog [/puppy] – away from your hands
 Applies liquid to your dog's [/puppy'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/puppies

Thermoform claims

New
 New [disposable][liquid dispensing] tube [cartridge][vial][pod]
 (Note tube/vial/cartridge/pod used interchangeably)
 [New] [brand name][disposable][liquid dispensing] [tube][vial][pod] tip [helps][to] spread out liquid [on your][dog/puppy]
 Unique [cartridge] [tube][vial][pod] with flow control
 [no drip][no mess][application][tube][cartridge][vial][pod]

Promotional Package Copy

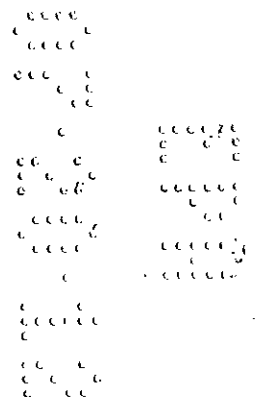
One month [dose] free
 One free month supply [dose] included
 Bonus pack
 Free [applicator][tube][vial][cartridge][pod][inside]
 Designed not to drip when set on top of the counter, or table, or other flat surface.
 For use with [brand] applicator
 Applicator [device] not included
 [brand] Refill Pack [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 (e.g., Adams or Bio Spot, Smart Shield)] [Applicator] [Refills][Refill Pack]
 [Refill Pack] [for][Brand Name] Applicator
 [tube][cartridge][vial][pod] refill pack [refills]
 Refills [Refill Pack] available
 New [refill][tube][cartridge][vial][pod] design

Applicator name options (applicator device is used in text)

Applicator
 Tool
 Device
 Applicator Device
 Application Tool



SUBLABEL A – APPLICATOR DEVICE PACKAGE

1. DIRECTIONS FOR USE WITH APPLICATOR

RF2181 KD A/T COMBO

IMPORTANT! DO NOT Use on Dogs/Puppies LESS THAN 10 Weeks OLD

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS AND PUPPIES. DO NOT USE ON OTHER ANIMALS!

DO NOT ALLOW CHILDREN TO APPLY PRODUCT.

[Back Panel]

INTRODUCTION:

[RF2181 KD A/T COMBO] prevents flea eggs from developing into adult fleas [more than 10 weeks] for up to [75 days][2.5 months]. RF2181 KD A/T COMBO also [kills fleas and ticks for 3 weeks] [controls fleas and ticks for up to 1 month] and kills and repels mosquitoes for 3 to 4 weeks.]

Effective flea & tick control for your dog/puppy.

[brand] provides flea and tick protection for dogs/puppies 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.

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/puppy 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/puppy’s hair to allow the liquid to more readily [better] reach [apply] the [to] [your dog’s/puppy’s] skin. The tube [vial][cartridge] is sealed inside, so you can be confident that the liquid goes onto your dog/puppy – 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.

The RF2181 KD A/T COMBO provides a unique applicator device that allows dog/puppy owners to treat their dogs/puppies more securely, and dispose of liquid cartridges [tubes][vials]with less mess.

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. *If necessary, product can be reapplied at 8 or more days after the initial application. Do not use more than one [vial] [tube][cartridge] per dog and do not retreat more than once per month. Do not get this product in dog’s/puppy’s eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than 6 lbs (required for smallest size only).

RF2181 KD A/T COMBO works by application directly to the dog’s/puppy’s skin, not to the hair. When applying, use applicator device tip to push aside dog’s/puppy’s hair to allow direct application to the skin.

[(Note: Application now assumes one tube[vial][cartridge] per dog/puppy per application)]
[Note: Each package contains sufficient tubes/applicators for [X] applications]

[DFU Set No. 1]

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

To apply the [RF2181 KD A/T COMBO] treatment, use one disposable liquid cartridge [tube][vial][for each application] with the applicator device.

[bullets may be used instead of numbers]

1. OPEN [icon]

Use finger scoop to lift open [color, e.g. green] door.

2. LOAD [icon] (2 alternate statements)

-[To Load, place tube [cartridge][vial] white side up into the open applicator with front of tube placed under tab on door]

-[To Load, place tube [cartridge][vial] white side up into the [open] applicator with tip end of tube placed under [color][U-shaped] tab on door]

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

3. CLOSE [icon]

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

4. APPLY [icon]

The dog/puppy should be standing for easy application. To apply, use [front edge of applicator] [tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color-green] door [number-once] at each of [two] (Toy/Small dogs/puppies) [three] (Medium dogs/puppies) 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/puppy. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon]

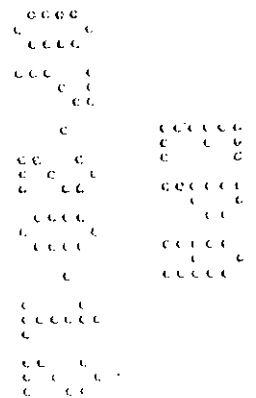
[When finished, hold applicator device over trash.] To dispose of empty tube, open [color, e.g. green] door and drop empty tube into trash or offer for recycling if available. [Close applicator device door and store in original package.]

6. RETREATMENT [REAPPLICATION] (2 Alt. statements)

- [*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.]

- [*If necessary, product can be reapplied, 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/PUPPIES

[bullets may be used instead of numbers]

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

The dog/puppy should be standing for easy application. To apply, use [front edge of applicator][tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color][green] door [number-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/puppy. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

- 5 ...
- 6 ...

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

RF2181 KD 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/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2181 KD A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.] [RF2181 KD A/T COMBO is water resistant and remains efficacious following exposure to rainfall or swimming.]

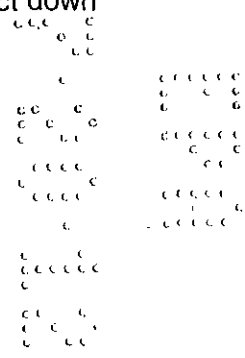
[TREATMENT SCHEDULE			
Dosage: 1 [cartridge] [tube][vial] every 30 days per dog/puppy			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

Reminder: I purchased RF2181 KD A/T COMBO from: _____

NOTES: _____

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

STORAGE and DISPOSAL: . **Pesticide Storage:** Store [tubes][vials][cartridges] together 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

HAZARDS TO HUMANS: 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.

HAZARDS TO ANIMALS: DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD. For external use only. Consult a veterinarian before using this product on debilitated, aged, pregnant, or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals. Sensitivities may occur after using ANY pesticide product for pets. Some sensitive dogs may experience temporary skin irritation such as itching or redness at the application site. If signs of sensitivity occur, bathe your dog/puppy with mild soap and rinse with large amounts of water. If signs persist or become more severe, call 1-800-brand phone number or contact your veterinarian immediately.

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.	

SIDE EFFECTS: Monitor your dog/puppy after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. Gastrointestinal signs such as vomiting or diarrhea have also been reported. If these or other side effects occur, consult your veterinarian or Wellmark at 1-800-brand phone number.



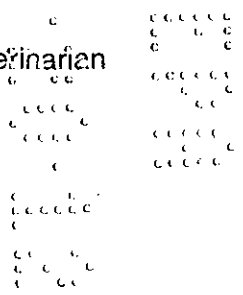
DO NOT USE ON CATS.
Keep cats away from treated dogs/puppies for 24 hours. If applied to a cat or ingested by a cat, contact your veterinarian.

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].

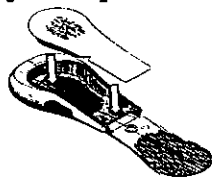
Wellmark International
1501 E. Woodfield Road, 200W
Schaumburg, Illinois 60173
[URL]
Made in USA



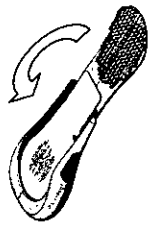
Alternate Sets of ICONS for the RF2181 KD A/T COMBO

[ICON SET 1]
[OPEN]

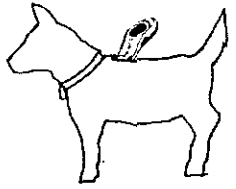
[LOAD]



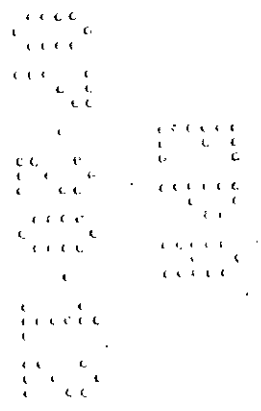
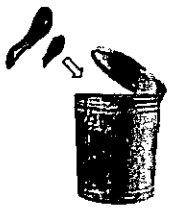
[CLOSE]



[APPLY]




[DISPOSE]




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

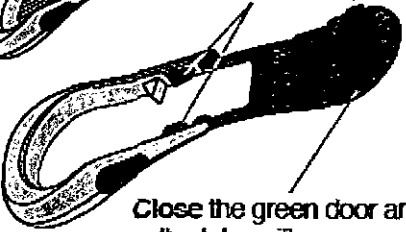
With green door facing down
Push two side buttons
to OPEN door



To LOAD Place tube with
WHITE side UP into applicator

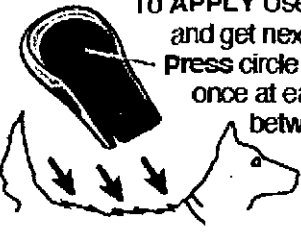


Click tube under
green holding tabs.

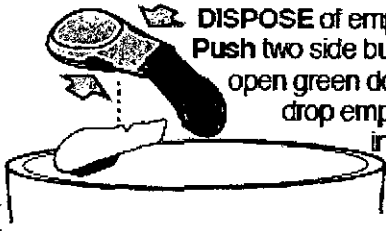


Close the green door and
the tube will snap open.

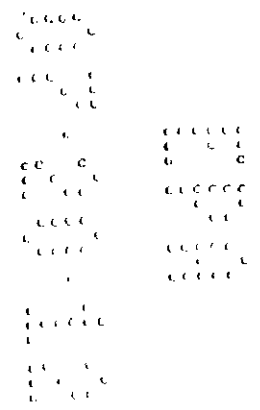
To APPLY Use Tip to part fur
and get next to dog's skin.
Press circle on green door
once at each of # spots
between shoulders
and tail

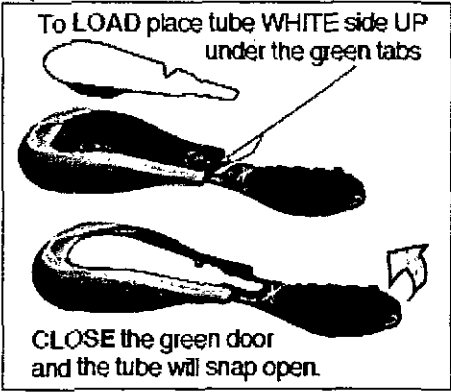


DISPOSE of empty tube
Push two side buttons to
open green door and
drop empty tube
into trash

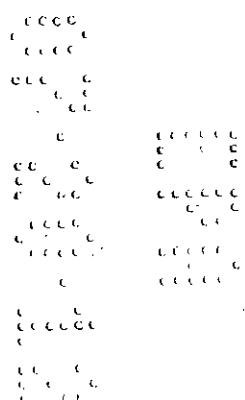


("#Spots" is a variable dependent on size)
Door color may change based on brand.
(Alternate LOAD icon)





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



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

[DFU Set No. 2] DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG/PUPPY

USE RESTRICTIONS:

Apply this product once every 30 days unless a retreatment is necessary. *If necessary, product can be reapplied at 8 or more days after the initial application. Do not use more than one vial [tube][cartridge] per dog and do not retreat more than once per month. Do not get this product in dog's/puppy's eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than 6 lbs (required for smallest size only).

RF2181 KD A/T COMBO works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin.

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

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

[bullets may be used instead of numbers]

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

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/puppy should be standing for easy application. Apply RF2181 KD A/T COMBO evenly to [two spots](toy/small dogs/puppies)[three spots](medium dogs/puppies) 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/puppy.
4. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 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/PUPPIES

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/puppy should be standing for easy application. Apply RF2181 KD 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/puppy.
4. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 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.

17/21

RF2181 KD 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.

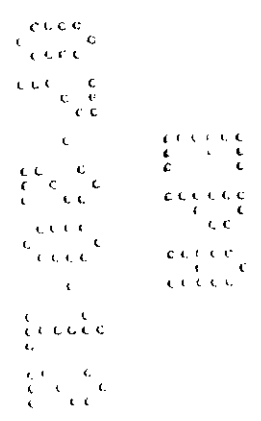
[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2181 KD A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.] [RF2181 KD A/T COMBO is water resistant and remains efficacious following exposure to rainfall or swimming.]

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

Reminder: I purchased RF2181 KD A/T COMBO from: _____

NOTES: _____

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



SUB-LABEL B FOR REFILLPACKAGE

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

(Front Panel)
[Product Name]

Front panel - For Use Only on Toy/Small (6-12 lbs.), Medium (13-31 lbs.), Large (32-79 lbs.) and Extra Large (80 lbs and over) Dogs/Puppies 10 weeks of age or older

[Flea & Tick [& Mosquito]][Treatment] [and] Control]
Spot-On Flea & Tick Control only for Dogs/Puppies 10 weeks of age or older

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

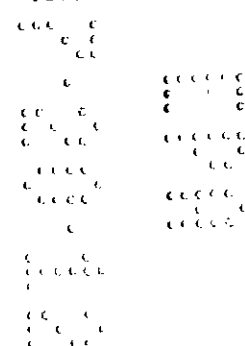
EPA Reg. No. 2724-XXX
EPA Est No.

NET CONTENTS:

(Number):	0.05 fl oz (1.5 cc) Applicator [tube] (Toy/Small Dogs)
.....	0.10 fl oz (3.0 cc) Applicator [tube] (Medium Dogs)
.....	0.20 fl oz (6.0 cc) Applicator [tube] (Large Dogs)
.....	0.30 fl oz (9.0 cc) Applicator [tube] (Extra Large Dogs)



**DO NOT USE
ON CATS!**



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[Back Panel]

**IMPORTANT! DO NOT Use on Dogs/Puppies LESS THAN 10 Weeks OLD
READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS/PUPPIES. DO NOT USE
ON OTHER ANIMALS! DO NOT ALLOW CHILDREN TO APPLY PRODUCT.**

[RF2181 KD A/T COMBO] prevents flea eggs from developing into adult fleas [more than 10 weeks] for up to [75 days][2.5 months]. RF2181 KD 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/puppy.
[brand] provides flea and tick protection for dogs/puppies 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 RF2181 KD 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.

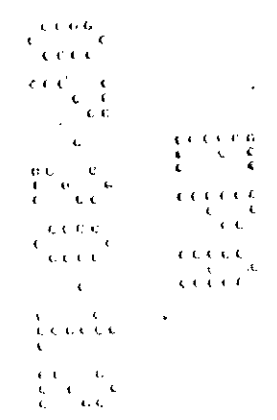
[However, if you choose to apply directly to dog/puppy without using the applicator device, read and follow the Directions for Use For Direct Application to Dog /Puppy on this package.]

(DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG/PUPPY)

[USE RESTRICTIONS:

Apply this product once every 30 days unless a retreatment is necessary. *If necessary, product can be reapplied at 8 or more days after the initial application. Do not use more than one vial [tube][cartridge] per dog and do not retreat more than once per month. Do not get this product in dog’s/puppy’s eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than 6 lbs (required for smallest size only).

RF2181 KD A/T COMBO works by application directly to the dog’s/puppy’s skin, not to the hair. When applying, manually push aside dog’s/puppy’s hair to allow direct application to the skin. Do not get this product in dog’s/puppy’s eyes or mouth.



[(Note: Application now assumes one applicator per animal per application)]
[Note: Each package contains sufficient tubes/applicators for [X] applications]

[bullets may be used instead of numbers]

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

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/puppy should be standing for easy application. Apply RF2181 KD A/T COMBO evenly to [two spots](toy/small dogs/puppies)[three spots](medium dogs/puppies) 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/puppy.
4. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 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/PUPPIES

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/puppy should be standing for easy application. Apply RF2181 KD 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/puppy.
4. Do not spread RF2181 KD A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 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.

RF2181 KD 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/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2181 KD A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.] [RF2181 KD 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/puppy			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

Reminder: I purchased RF2181 KD 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

