



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 4, 2015

Combat Insect Control Systems
c/o Georgia Anastasiou, Agent
Lewis & Harrison, LLC
122 C St., Suite 505
Washington, DC 20001

Subject: Label Notification per PRN 98-10 – Addition of marketing claims for a new adhesive to be used on the back of the strips
Product Name: Combat® Flik A
EPA Registration Number: 64240-68
Application Date: January 9, 2015
Decision Number: 499461

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

If you have any questions, you may contact Jennifer Gaines at 703-305-5967 or via email at gaines.jennifer@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Gaines" followed by a small mark that appears to be "bn".

Kable Bo Davis, Product Manager 03
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Note: Bold, Italicized text is information for the reader and is not part of the label.

[Bracketed information is optional text.]

NOTIFICATION

64240-68

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

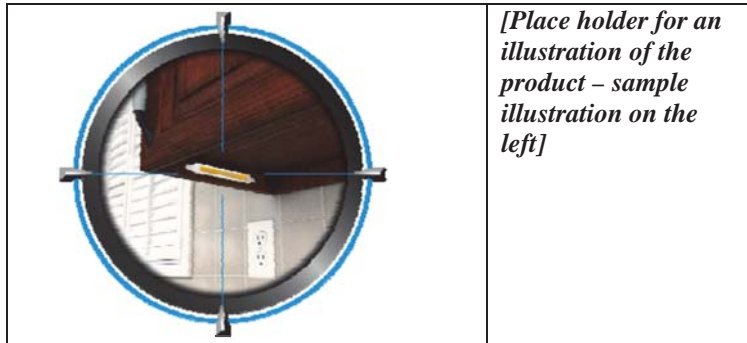
02/04/2015

COMBAT® Flik A

Previously Approved Alternate Brand Names:

[Combat Ant Killing Bait Strips]

[Combat Max Ant Killing Bait Strips]



ACTIVE INGREDIENT: Fipronil†0.001%
 OTHER INGREDIENTS:99.999%
 TOTAL.....100.000%
 † CAS No. 120068-37-3

**USE ONLY IN AREAS INACCESSIBLE TO CHILDREN AND PETS
KEEP OUT OF REACH OF CHILDREN**

CAUTION: See [side] [and][or] [back] [panel] [of pouch] for additional precautionary statements and directions

Contains: [2 [to] [-] 24] [5] [Gel] [Bait] [Strips] [5 x 0.035 oz. (2 g)]
 [Each Containing][:] [0.070 oz (2.0 g) [to][-] 0.140 oz (4.0 g)]
 [TOTAL] NET WT[:] _____

EPA Reg. No: 64240-68
 EPA Est. No. _____ [85632-KOR-001]

[Manufactured for] [Distributed by] [&] © [year] Combat Insect Control Systems
 [7201] [E. Henkel Way], Scottsdale, [AZ] [ARIZONA] 85255
 MADE IN [USA][KOREA]

[Patent Pending] [Patent Number]
 [[Call the] [Combat [Information] Helpline: 1-800-426-6228] [for information.]]
 [The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]

Note: Bold, Italicized text is information for the reader and is not part of the label.

[Bracketed information is optional text.]

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

CAUTION: Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

FIRST AID:

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

If in Eyes: Hold eye open, rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. 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.

PHYSICAL OR CHEMICAL HAZARDS: Do not use this product in or on electrical equipment due to the possibility of a shock hazard.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry area out of reach of children.

DISPOSAL:

If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, place in trash.

If partly filled: Call your local solid waste agency for disposal instructions. [Never place unused product down any indoor or outdoor drain.]


{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The batch code number will appear on each bait strip.}

For front or back or side panel:

[Satisfaction guaranteed] [Guaranteed to work] [or your money back][!]

[EFFECTIVENESS GUARANTEED: COMBAT® [Insect Control Systems] stands behind this [insect killing system] [product] with a full [Satisfaction] Guarantee. Should you have any questions regarding COMBAT® [baits] [products], please call 1-800-426-6228.]

[[For information,] [For questions or comments,] [please] call the Combat® [Labs] [Information] Helpline at 1-800-426-6228] [for information].]

[[] [[The] [Paperboard in this] Carton [contains] [is made from] _____% Recycled fiber [minimum _____% post consumer content].] [PLEASE RECYCLE EMPTY CARTON]



[GENERAL INFORMATION]

[This product] [***Combat Flik A or alternate brand name***] provides fast control of ants* in as little as 3-5 days.]

[This product] [***Combat Flik A or alternate brand name***] is formulated to effectively control ants*.]

[That's because] [this product] [***Combat Flik A or alternate brand name***] contains Fipronil, a fast-acting active ingredient[.]. [Its speed is] [That's] [[still] slow enough for foraging ants* to] [return to the [colony] [nest] [and] [feed the bait to larvae and queen[s]] [so that the entire [colony] [nest] is killed [through] [by] the Domino Effect™.]

[[This is] [How] [This Product] [***Combat Flik A or alternate brand name***] Work[s]:]

[•][1] [Ants* [visit] [find] the [gel] bait [strips] and [eat] [feed on] the [gel] bait]

[•][1] [This product attracts [foraging] [worker] ants* [to the bait strip][s][.][and] [The] [Ants*] feed on the [gel] bait]

[•][2] [Ants* carry [the] [gel] bait back to [the] [colony] [nest] [so] [that] it [can] kill[s] the queen and [other ants] [in] [the nest] [the colony]]

[•][2] Worker ants* take [some of] the [gel] bait back to the [nest] [colony] [and] [where they] [pass it on to] [feed it to] [kill] [destroy] the queen and entire [colony] [nest]

[♦] [Do not interfere with the ants or [gel] bait strips during use]

[♦] [[Replace] [Place more] [gel] bait strips] if ants return]

[♦] [Do not use sprays on or around [the] [product] [gel] [bait][s] [strips] [placements]]

[♦] [Do not use strong cleaners around [the] [product] [gel] [bait][s] [strips] [placements]]

[♦] [Do not use sprays or strong cleaners on or around [the] [product] [gel] [bait][s] [strips] [placements]]

[♦] [Place [the] [product] [gel] [bait][s] [strips] out of reach of children and pets]

{Note: This footnote applies to all asterisks above.}

* Except for fire and harvester ants

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Keep [gel] bait strips away from open foods and food contact surfaces. Do not apply [gel] bait strip[s] on food/feed preparation surfaces.

For indoor and outdoor (adjacent to the home) use:

- [1.] Break [bait] strips apart. [See] [Illustration] [Picture] [Figure] [1] [A]
- [2.] [To] place [a] [gel] [bait] [s] [strip[s]] [securely] [in a chosen location] indoors or outdoors (adjacent to the home), peel off [protective] [covering][tape][film] [on the bottom of the strip] [marked] ["Remove to Adhere"]. [See] [Illustration] [Picture] [Figure] [2] [B]
[Discard [the] [removed] [covering] [tape] [film] in the trash.]
- [3.] [Inspect for ants.] [Stick][Adhere] [it] [the] [gel] [bait] strip[s] [the exposed side] [the strip] to [a] clean surface. Place near [an] ant trail[s] [or where] [you frequently see ant[s][activity]] [ants may enter your home][;] [near cracks, crevices, [and] along sills][.]. [under and behind kitchen appliances][.]. [along baseboards, under sinks, in pantry][.]. [around pipes and water heater and in the garage.]
[[The] [D][d]iagram[s] [above] [below] [at right] [at left] show[s] recommended placement locations.]
Use all bait strips [at one time].
- [4.] To activate [a] [gel] [bait] strip [already stuck to a clean surface], peel off the [protective] [covering] [tape] [film] [on top of the strip] [marked] ["Peel Here"].
[See] [Illustration] [Picture] [Figure] [3] [C] [of] [for] [showing] [gel] [bait] [strip ready to be activated.]
[See] [Illustration] [Picture] [Figure] [4] [D] [of] [for] [showing] [shows] [a] [strip being activated.]
[Discard [the] [removed] [covering] [tape] [film] in the trash.]

TIPS

- [Once opened, the [gel] [bait] strip may be left in place [for] up to 1 month.]
[Replace [gel] [bait][s] [strips] after 1 month [to keep ants* from returning.]]
[You will notice fewer ants* [in days] [within a week].] [Ant* population reduction will be apparent [in days] [within a week].] [Ant* population will be reduced [in days] [within a week].] [Discard [used] [old] [replaced] strips [to be replaced] [by placing] in [the] trash.]
[Do not spray insecticide on or around [the] [bait][s] [strip][s],] as sprays will contaminate [bait][s] [strip][s] and reduce effectiveness.]

{Note: This footnote applies to all asterisks above.}

*Except for fire and harvester ants

[Note to reviewer: Label may include alternate usage instructions outlined below instead of those listed on the previous page. The only difference is how the adhesive is placed on the strip.]

For indoor and outdoor (adjacent to the home) use:

- [1.] Break [bait] strips apart. [See] [Illustration] [Picture] [Figure] [1] [A]
- [2.] [To] place [a] [gel] [bait[s]] [strip[s]] [securely] [in a chosen location] indoors or outdoors (adjacent to the home), remove adhesive tab from pouch and adhere to [bottom of] strip [marked "Place Sticker Here"]. [See] [Illustration] [Picture] [Figure] [2 alt] [B alt]. Peel off [protective] [covering] [tape] [film] [on the bottom of the strip] [marked] ["Remove to Adhere"]. [See] [Illustration] [Picture] [Figure] [2] [B]

[Discard [the] [removed] [covering] [tape] [film] in the trash.]
- [3.] [Inspect for ants.] [Stick][Adhere] [it] [gel] [bait strip[s]] [the exposed side] [the strip] to [a] clean surface. Place near [an] ant trail[s] [or where] [you frequently see ant[s][activity]] [ants may enter your home]; [near cracks, crevices, [and] along sills][.] [under and behind kitchen appliances][.] [along baseboards, under sinks, in pantry][.] [around pipes and water heater and in the garage.]

[[The] [D][d]iagram[s] [above] [below] [at right] [at left] show[s] recommended placement locations.]

Use all bait strips [at one time].
- [4.] To activate [a] [gel] [bait] strip [already stuck to a clean surface], peel off the [protective] [covering] [tape] [film] [on top of the strip] [marked] ["Peel Here"].

[See] [Illustration] [Picture] [Figure] [3] [C] [of] [for] [showing] [gel] [bait] strip ready to be activated.]

[See] [Illustration] [Picture] [Figure] [4] [D] [of] [for] [showing] [shows] [a] strip being activated.]

[Discard [the] [removed] [covering] [tape] [film] in the trash.]

[TIPS]

[Once opened, the [gel] [bait] strip may be left in place [for] up to 1 month.]
[Replace [gel] [bait][s] [strips] after 1 month [to keep ants* from returning.]]
[You will notice fewer ants* [in days] [within a week].] [Ant* population reduction will be apparent [in days] [within a week].] [Ant* population will be reduced [in days] [within a week].] [Discard [used] [old] [replaced] strips [to be replaced] [by placing] in [the] trash.]
[Do not spray insecticide on or around [the] [bait][s] [strip][s],] as sprays will contaminate [bait][s] [strip][s] and reduce effectiveness.]

{Note: This footnote applies to all asterisks above.}

*Except for fire and harvester ants.

Note: Bold, Italicized text is information for the reader and is not part of the label.

[Bracketed information is optional text.]

DIRECTIONS FOR USE (continued):

{Note: All photos below are optional. These or similar photos may be added to the directions for use.}



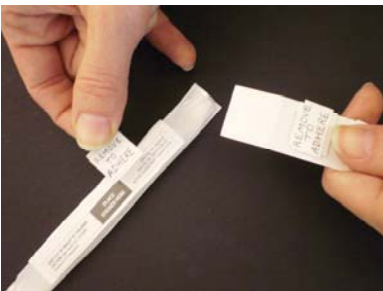
[Illustration] [Picture] [Figure] [1] [A]



[Illustration] [Picture] [Figure] [2] [B]



[Illustration] [Picture] [Figure] [3] [C]



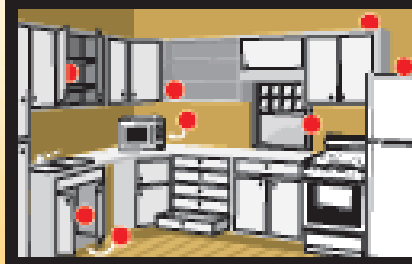
[Illustration] [Picture] [Figure] [2 alt] [B alt]

Note: Bold, Italicized text is information for the reader and is not part of the label.

[Bracketed information is optional text.]

{{Note to reviewer: Label may include these or similar graphic depictions of recommended placement locations.}}

[Recommended [Bait] Strip Placement [Locations]:]



Example illustration of suggested bait strip placement sites.

Optional claims for front or back or side panel of label

1. [Easy-to-use] [Easy to use]
2. Easy to apply [anywhere]
3. [Leaves] no [messy] [residue] [or] [messy clean up]
4. [There's] no [residue] [or] [mess to clean up]
5. Convenient
6. [Mess free] [Mess-free]
7. No mess
8. No [vapors][,] [fumes] [or] [mess]
9. [Kills] [Stops] [Eliminates] ants* [without] [messy] [residue] [and] [without insecticide] odors [and] [or] [fumes]
10. Works [without] [messy] [residue] [and] without [insecticide] odors [or fumes]
11. [This] [product is] [gel] [bait] [strip][s] [are] easy to use [and] [has] [have] no insecticide odor]
12. No insecticide odor
13. [It's] [the] [clean][,] [easy] way to solve your [ant] problem
14. [Thin][,] [clear][,] [adhesive] strips
15. COMBAT® [**Combat Flick A or alternate brand name**] [killing] [gel] [bait] [strip][s] for ants*
16. COMBAT® [**Combat Flick A or alternate brand name**] [ant* killing] [gel] [bait] [strips]
17. COMBAT® [**Combat Flick A or alternate brand name**] [Ant Killing] [gel] [bait][s] [strips] [aren't] [are not] [tape] [or] [glue] [or sticky] [traps] [that] ants* stick to
18. [Inconspicuous] [and] [discreet] [and easy to apply] [anywhere] [where] [ants* [are] [may be] [a problem] [found]]
19. [Ant] [insecticide] [Gel] [bait] [in] [convenient][,] [easy-to-use] [form] [strip][s]
20. [Ant killing] [gel] [bait] in [convenient][,] [easy-to-use] [form] [strip][s]
21. Goes where bait stations can't
22. COMBAT® [**Combat Flick A or alternate brand name**] [ant* killing] [gel] [bait] [strips] go where bait stations can't
23. [The convenient] Ant* killing [bait] [gel] [form] [strip][s] [that] go[es] where bait stations can't
24. ANT*
25. [For] [Provides control of] ants*
26. Gain control of your ant* problem
27. Effective against Argentine, Ghost, Acrobat, Big-Headed, Cornfield, Field, Odorous House, Thief, Pavement, White Footed, [and] Little Black Ants
28. Effective against common household ants
29. Food [&][and][+] water [formulation] [formula] attracts [worker] [foraging] ants* to the [insecticide] [gel] [bait] [strips]
30. What ants* are looking for
31. With fipronil
32. COMBAT®'s [potent] [ant killing] [insecticide] [gel] [bait][s] [strip][s] [with Fipronil]

{Note: This footnote applies to all asterisks above.}

*Except for fire and harvester ants

Optional claims for front or back or side panel of label - continued

33. COMBAT® [**Combat Flick A or alternate brand name**] has [a] [specific] [combination of] ant food attractants and a [fast] [fast-killing] [fast-acting] [active ingredient] [insecticide] [to create] [and is] [making it] [a highly effective tool] [in the fight against ants*] [to kill ants*] [to fight your ant* problem]
34. The [insecticide] [gel] [bait] attracts ants* in search of food and water [to the bait] [to the strip]
35. [COMBAT®] [insecticide] [Bait][s] [gel] [strips] [contain][s] [food and water] [for ants*] [ants* seek] [but] do not spill
36. Fast killing formula
37. Fast control [of ants*] [in] [as little as] [3-5 days]
38. Starts [working] [killing] [ants*] in hours
39. COMBAT® [**Combat Flick A or alternate brand name**] [ant killing] [gel] [bait] [strips] kill[s] ants* fast
40. Visible results overnight
41. Kills ants* while you sleep
42. [Ant*] [colony] [nest] [elimination] [control] in as little as 3-5 days
43. [Fast acting] formula [that] quickly kills ants* [and] [the colony] [the nest]
44. Kills quickly and keeps on killing [ants*] [back at the [nest][colony]]
45. Works in [as little as] hours and [for] up to 1 month
46. Long residual action [for up to 1 month]
47. Keeps [working] [killing ants*] [for] up to 1 month
48. Provides round the clock protection [for up to 1 month]
49. Kill ants* 24/7 [for up to 1 month]
50. Provides 24/7 [ant*] protection [for up to 1 month]
51. Kills ants* for up to 1 months
52. Kills ants* continuously
53. Kills [ants*] non-stop
54. [Ongoing] [Non-stop] ant* control
55. Keeps [killing [ants*]] [working] until [it's] [the bait is] gone
56. [The] Domino Effect™
57. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Get][s] [to] [the nest] [the colony] [,] [the source of [the] [your] [ant] problem]
58. [COMBAT®] [G[g]el] [bait][s] [strips] Kill[s] [ants] [in hard-to-reach] [and] [inaccessible] [areas] [places]
59. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] ants where they [hide] [breed] [live] [nest]
60. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] ants* you don't see
61. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] ants* [where] you can't see them

{Note: This footnote applies to all asterisks above.}

*Except for fire and harvester ants

Optional claims for front or back or side panel of label - continued

62. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] ants you see and [those] [ones] you don't [see]
63. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] [the ant*] [ants* at the] source
64. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] ants* in the [nest] [colony]
65. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] the ant* [nest] [colony]
66. [COMBAT®] [G[g]el] [bait][s] [strips] Lets ants* [Kill] [Stop] [Eliminate] [Destroy] [other] ants*
67. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] [the] [queen and] [the] [entire] [ant*] [colony] [nest]
68. [Worker] [Forager] Ants* [take] [share] [it] [COMBAT®] [s ingredients] [the] [insecticide] [gel] [bait] [back to] [back at] [with] [in] the [colony] [nest] [queen*]
69. Ants* share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the [nest][colony]][,] [killing other ants*] [and] [destroying the [nest] [colony]]
70. Ants* share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the [nest] [colony]][,] [killing other ants] [and] [destroying [the] [local] [your] [ant] population]
71. Ants* eat the [insecticide] [gel] [bait] and die in the [nest] [colony]
72. Ants* are attracted to the [insecticide] [bait] [gel] and take it back to their [nest] [colony]
73. Kills ants* [&][and] the [entire] [colony] [nest]
74. Kills ants* in the [colony] [nest]
75. [Destroys] [Kills] [the] [queen*] [and] [the] [entire] [ant*] [colony] [nest]
76. [This product is effective because] ants* carry [gel] [insecticide] [bait] back [to where they live] [to the colony] [to the nest] to [destroy] [stop] [kill] [the] queen [and entire colony]
77. [Worker] [Forager] ants are attracted to the [insecticide] [bait] [gel] and take it back to their [colony] [nest], [ultimately] killing the queen [and the whole [colony] [nest]]
78. Ants* carry [COMBAT®] [insecticide] [bait] [gel] [ingredients] [back] to the [colony] [nest] to [stop] [kill] the queen [and other ants*] [[before they] [so they don't] invade your home [kitchen]]
79. Kills ants* [at their source] [in the nest] [in the colony]
80. This product[s patented action formula] kills ants
81. This product provides complete ant control
82. Kills ants* while you sleep
83. Kills ants* for 1 month
84. [Kills] [Stops] [Eliminates] [indoor and outdoor (adjacent to the home)] ants*
85. Kill the ones you see and the ones you don't [see]
86. [Your] secret weapon [against ants]
87. [5] discreet [killing] bait strips
88. [Good] for hard to reach areas

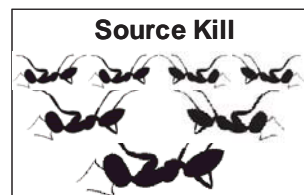
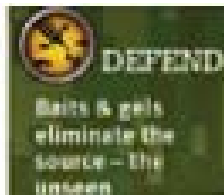
{Note: This footnote applies to all asterisks above.}

*Except for fire and harvester ants

Optional claims for front or back or side panel of label - continued

89. [Kills] [Stops] ants* outdoors (adjacent to the home) before they come indoors [so that they don't] [and] [invade your home]
90. [It even] kills ants* [you don't see] [outside (adjacent to the home)] [to prevent more ants* from coming inside] [invading your home]
91. [For] [Indoor and] Outdoor (adjacent to the home) [ant*] [control] [use]
92. [Ideal for] use with COMBAT® [**another Combat product name**]
93. [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® ant bait [station][s] products [for maximum control]
94. [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® ant gel[s] [products] [in syringe form] [for maximum control]
95. [Ideal for] use [in combination] with other COMBAT® ant [bait][s] [products] [for maximum control]
96. Works fast [!]
97. Kills fast [!]
98. Leaves no mess [!]
99. Kill[s] the [entire] colony [!]
100. Discreet design [!]

Optional Claims



{Note: This footnote applies to all asterisks above.}

*Except for fire and harvester ants

Value claims:

Value claims below are only for packs with net contents greater than 2 baits but not to exceed 24:

- Bonus Pack
- Value Pack
- [x][More]^{††} [Free] [Bonus] Baits^{††} [With Purchase]
- [x%] More^{††} [Free] [Bonus] Bait(s)^{††} [With Purchase]
- More Baits – Better Value^{††}
- Value Pack – More Baits^{††}
- Better Value^{††}
- More Baits^{††}

^{††}vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]

Note: Bold, Italicized text is information for the reader and is not part of the label.

[Bracketed information is optional text.]

Adhesive Claims:

- [New] [Improved] [More] adhesive [strength][**]
- [Better] [Improved] [More] adhesion power[**]
- [Now] [3x] [longer] [more] [adhesive][**]

{Note: This footnote applies to all ** above.}

[**vs. previous adhesive]

Bait Strip Unit Label for Combat® Flik A



TOP VIEW - AS IT APPEARS BEFORE STRIPS ARE BROKEN APART

Text below is what will appear on strip.

Combat brand logo {as it appears in the photo or similar graphics}

Peel Here



BOTTOM VIEW – AS IT APPEARS BEFORE adhesive is removed

Text below is what will appear on strip. Batch code will be added to the bait strip or to the label.

KEEP OUT OF REACH OF CHILDREN.

CAUTION: See [Outer Carton] [Pouch] for Complete Directions & Precautions

Remove to Adhere {on small sticker before it is removed}

EPA Reg. No. 64240-68

EPA Est. No. 85632-KOR-001

ACTIVE INGREDIENT: Fipronil 0.001%



TOP VIEW - AS IT APPEARS AFTER PLACEMENT BUT NOT YET ACTIVATED

Combat logo {as it appears in the photo or similar graphics}



TOP VIEW - AS IT APPEARS AFTER PLACEMENT AND ACTIVATION