

	United States	<input type="checkbox"/> Registration	OPP Identifier Number
	Environmental Protection Agency	<input type="checkbox"/> Amendment	
	Washington, DC 20460	<input checked="" type="checkbox"/> Other	

NOTIFICATION

Application for Pesticide - Section I

1. Company/Product Number 69332-4	2. EPA Product Manager G. Larocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PL #1001 Etofenprox Spot-On	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Pet Logic, LLC P.O. Box 18993 Memphis, TN 38181 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated	NOTIFICATION APR 15 2005
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated 2-15-05	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Submission of a label notification pursuant to PR Notice 98-10.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name James Messina	Title Authorized Representative	Telephone No. (Include Area Code) 202-772-4932
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Authorized Representative	
4. Typed Name James Messina	5. Date 3-22-05	

NOTE TO REVIEWER: [brackets and italics indicate alternate language.]
START CARTON / PACKAGE FRONT PANEL

NOTIFICATION

APR 15 2005

PL #1001

ETOFENPROX SPOT-ON
[SQUEEZE-ON][STRIPE-ON]

FLEA, (Deer) or (Black Legged)TICK, and MOSQUITO CONTROL FOR CATS
[for smaller cats over 2.2 lbs. and under 5 lbs.]

[For cats 5 lbs and over] [(for cats and kittens over 12 weeks of age and over 2.2 lbs.)
(for cats and kittens over 12 weeks of age)

[(ONE), (TWO),(THREE),]MONTH SUPPLY
QUICK ACTING & LONG LASTING

ONE APPLICATION: (choose from the following)

- Use only on cats
- Monthly Protection
- Reapply monthly
- Repels mosquitoes (for up to 30 days)
- KILLS ADULT FLEAS FOR UP TO 28 DAYS (4 WEEKS) (1 MONTH) (per application)
- KILLS FLEAS, (Deer) or (Black legged) TICKS, and Repels Mosquitoes [for up to (28 days) (1 month)]
- MONTHLY FLEA, (Deer) or (Black legged) TICK, and MOSQUITO PROTECTION.
- 3 WAY PROTECTION [Kills fleas, (Deer) or (Black Legged) Ticks, and repels mosquitoes]
- Specially formulated for Cats
- KILLS FLEAS, (Deer) or (Black legged) TICKS for up to (4 WEEKS) (1 MONTH) (28 DAYS) (per application)
- KILLS (Deer) or (Black legged) TICKS FOR UP TO 28 DAYS (4 WEEKS) (1 MONTH) (per application)
- KILLS (Deer) or (Black legged) TICKS [BEFORE THEY CAN] [THAT] TRANSMIT LYME DISEASE, FOR UP TO (4 WEEKS) (1 MONTH) (per application)
- PREVENTS MOSQUITOES THAT TRANSMIT WEST NILE VIRUS FROM FEEDING ON CATS FOR UP TO ONE MONTH (per application)
- Quick acting (and) long lasting
- [Brochure][and][calendar reminder stickers][enclosed][inside]

[front/back panel location]

ACTIVE INGREDIENTS:

Etofenprox.....55.00%

INERT INGREDIENTS.....45.00%

TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN
CAUTION

See [Side] [Back] Panel For Additional Precautionary Statements

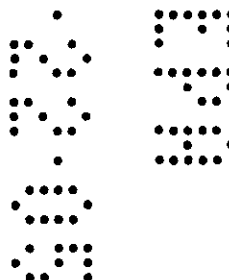
NET CONTENTS:

One [Two][Three] 0.7 ml applicators. [(for small cats between 2.2 lbs and 5 lbs)]

One [Two][Three] 1.4 ml applicators. (for large cats over 5 lbs)

[Two] 0.7 ml applicators. (for large cats over 5 lbs)

END CARTON / PACKAGE FRONT PANEL



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START CARTON / PACKAGE - BACK / SIDE PANEL

READ ENTIRE LABEL BEFORE EACH USE

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

HAZARDS TO HUMANS: Causes moderate eye irritation. Avoid contact with eyes and clothing. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Repeated exposure to etofenprox can cause skin irritation.

HAZARDS TO DOMESTIC ANIMALS: For External Use Only. Do not use on pets under 12 weeks of age. Do not use on cats under [2.2][5] pounds. Consult a veterinarian before using this product on debilitated, aged, pregnant, or nursing animals. 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. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the 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 1-800-224-PETS for emergency medical treatment information.

PHYSICAL-CHEMICAL HAZARDS: Combustible: Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

Do not get this product in your pet's eyes or mouth. Do not apply more often than once every 30 days. Use only on cats. Do not bathe pet with in the first 24 hours after squeeze-on has been applied. Households with more than one cat should not allow cats to groom each other until solution has dried.

FOR USE ON CATS:

Weighing 2.2 pounds to less than 5 pounds - Apply contents of one (0.7 ml) tube [vial] of Etofenprox Spot-On as a spot high on the back of the cat's neck behind its head.

Weighing 5 pounds or more - Apply contents of two (0.7 ml) tubes [vials] of Etofenprox Spot-On solution as a spot or stripe, starting high on the back of the cat's neck to in front of the shoulder blades.

Or Apply one (1.4 ml) tube [vial] of Etofenprox Spot-On solution as a spot or stripe, starting high on the back of the cat's neck to in front of the shoulder blades.

(INSERT DIAGRAHM THAT DEPICTS APPLICATION OF PRODUCT ON THE CAT)

HOW TO APPLY:

Remove product tube [vial] from the package. Holding tube [vial] with notched end pointing up and away from the face and body, cut or tear off the narrow end at the notches. While holding the animal with one hand, use the other hand to apply the solution. Invert the tube [vial] and use the narrow end to part the animal's hair while gently squeezing to apply to the animal's skin. Hold the animal for a few seconds to give the solution time to be absorbed into the animal's coat. When finished, wrap the tube [vial] in paper and put into the trash.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Storage: Store in a cool, dry place.

Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

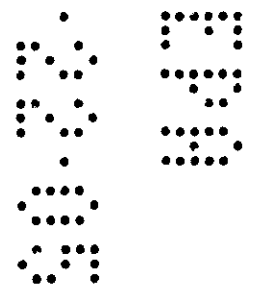
Container Disposal: Do not reuse empty container. Wrap and put in trash.

In case of an emergency, call 1-800-781-4738

Non-Emergency call 1-800-224-PETS (7387)

EPA Registration Number 69332-4

EPA Est. No.



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MANUFACTURED BY:

**PET LOGIC, LLC
P.O. BOX 18993
MEMPHIS, TN 38181**

Pet Logic, LLC is committed to providing high quality products. If you have questions or comments about this product, please write: Pet Logic, LLC Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399. Made in the USA. Visit us at www.petlogic.com.

END CARTON / PACKAGE - BACK / SIDEPANEL

TUBE / VIAL LABEL

PL #1001

Etopenprox.....55.00%

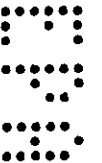
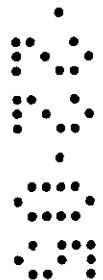
KEEP OUT OF REACH OF CHILDREN

CAUTION: Read directions and precautions before using.

EPA Reg. No. 69332-4

0.7 mL

1.4 mL



Exponent®

March 22, 2005

George LaRocca
Product Manger 13
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (NOTIF)
Document Processing Desk
1801 South Bell Street
Room 266A, Crystal Mall 2
Arlington, VA 22202

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Exponent
1730 Rhode Island Ave., NW
Suite 1100
Washington, DC 20036
telephone 202-772-4900
facsimile 202-772-4979
www.exponent.com

Subject: Resubmission of a Label Notification for PL #1001 (EPA Reg. 69332-4)
Project No. WD00759.000

Dear Mr. LaRocca:

On behalf of our client Pet Logic, LLC. (P.O. Box 18993, Memphis, Tennessee 38181, EPA Company Number 69332), Exponent is resubmitting a label notification in response to an EPA letter dated February 15, 2005 for the product PL #1001 (EPA Registration Number 69332-4), containing the EPA registered active ingredient etofenprox. The enclosed label notification meets EPA's Pesticide Registration Notice 98-10. Please find the following information enclosed in support of this label notification:

- Copy of EPA letter dated February 15, 2005;
- EPA Form 8570-1; and
- Product Label (five copies).

The label has been updated to add the text, "Pet Logic, LLC is committed to providing high quality products. If you have any questions or comments about this product, please write: Pet Logic, LLC. Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399. Made in the USA. Visit us at www.petlogic.com." We have made some other minor label clarifications to make it more user friendly in addition to the above text. All revisions are highlighted on the enclosed updated label.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. Pet Logic, LLC understands that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. Pet Logic, LLC further understands that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and Pet Logic, LLC may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

NOTIFICATION

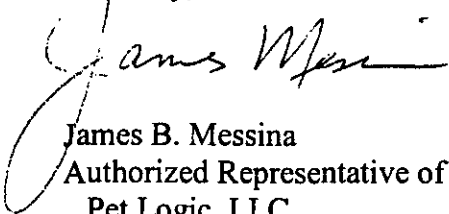
APR 15 2005

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George LaRocca
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If you have any questions, please contact me at (202) 772-4932.

Sincerely,



James B. Messina
Authorized Representative of
Pet Logic, LLC.

Enclosures

cc: Caryn Stichler, Sergeants
Larry Nouvel, Nouvel

...

...

EX