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10/6/2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Karen E. Warkentien, Consultant for
Pet Logic LLC c/o Sergeant's Pet Care Products
Lewis & Harrison LLC
122 C Street, N.W.
Suite 740
Washington, DC 20001

Dear Ms. Warkentien,

Subject: Revised Labeling to Remove Lower Weight Limit for Cats/Kittens
Product Name: SPI #8208-55D
EPA Reg. No. 69332-3
Product Name: PL #1001
EPA Reg. No. 69332-4
Submissions dated February 25, 2008

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

A stamped copy of each label and a copy of the product specific data evaluation review (DER) are enclosed for your records. Submit two copies of the revised finished labeling within 60 days of the receipt of this letter. If you have any questions, please contact Kevin Sweeney at (703) 305-5063. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken
Product Manager 13
Insecticide Branch
Registration Division (7505P)

Enclosures

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Sergeant's Master Label

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Information in [] is optional.

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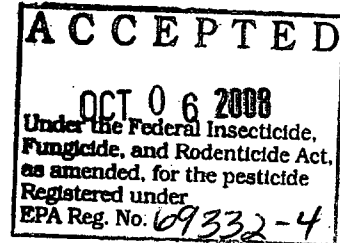
FRONT PANEL

CAT SQUEEZE-ON
Etofenprox

Editors Note: [Optional proposed text appears in brackets – the final label may include some or all of the optional text]

PL #1001

[[ETOFPNPROX] SPOT-ON [SQUEEZE-ON] [STRIPE-ON]]
[FLEA, (Deer) or (Black Legged) TICK, and MOSQUITO CONTROL FOR CATS]
[for smaller cats over under 5 lbs.]
[For cats 5 lbs and over]
[for cats and kittens over 12 weeks of age]
[WITH NYLAR®]
[[ONE], [TWO], [THREE], MONTH SUPPLY]]
[QUICK ACTING & LONG LASTING]



ONE APPLICATION: (choose from the following)

- [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]
- [Quick Acting, [and] Long Lasting]
- [Specially formulated for Cats]
- [KILLS FLEAS, (Deer) or (Black legged) and 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)]
- [Brochure][and][calendar reminder stickers][enclosed][inside]

{Ingredient Statement may be on front or back label}

ACTIVE INGREDIENTS:

Etofenprox 55.00%

OTHER INGREDIENTS: 45.00%

TOTAL 100.00%

[Nylar® is a registered trademark of McLaughlin Gormley King Company]

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

NET CONTENTS:

[One] [Two][Three] 0.024 fl oz (0.7 mL) applicators [(for small cats under 5 lbs)]

[One] [Two][Three] 0.047 fl oz (1.4 mL) applicators [(for large cats over 5 lbs)]

[Two] 0.047 fl oz (0.7 mL) applicators [(for large cats over 5 lbs)]

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BACK PANEL

CAT SQUEEZE - ON

Etofenprox

{Product Name}

**READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON CATS**

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

HAZARDS TO HUMANS: Causes moderate eye irritation. Avoid contact with eyes and clothing. 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. 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.

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

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.

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 less than 5 pounds - Apply contents of one 0.024 fl oz (0.7 mL) tube [vial] of {Product Name} as a spot high on the back of the cat's neck behind its head.

Weighing 5 pounds or more - Apply contents of two 0.024 fl oz (0.7 mL) tubes [vials] of {Product Name} 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 0.047 fl oz (1.4 mL) tube [vial] of {Product Name} solution as a spot or stripe, starting high on the back of the cat's neck to in front of the shoulder blades.

(INSERT DIAGRAM 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.

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STORAGE AND DISPOSAL

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

Storage: Store in a cool, dry place.

Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[NOTICE OF WARRANTY Sergeant's Care Pet Products, Inc. makes no warranty of merchantability, fitness for any particular purpose, or otherwise expressed or implied concerning this product or its uses which extend beyond the use of the product under normal conditions in accordance with the statements made on this label.]

[Sergeant's Care Pet Products, Inc. is committed to providing high quality products. If you have questions or comments about this product, please write: Sergeant's Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399.]

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

[For more information] [Visit us at:] www.sergeants.com
Made in USA

Distributed by:
Pet Logic, LLC, A Division of
Sergeant's Pet Care Products, Inc.
Omaha, NE 68130
{END - BACK / SIDE PANEL}

EPA Reg. No. 69332-4
EPA Est. No. XXXXXXXX
{date & label code}

TUBE / VIAL LABEL

Front Label

{Product Name}
Etofenprox55.0% W/W
0.024 fl oz (0.7 mL) (or) 0.047 fl oz (1.4 mL) {label code}

Back Label

KEEP OUT OF REACH OF CHILDREN
CAUTION: Read directions and precautions before using.
EPA REG. No. 69332-4 {label code}