

Ms. Rebecca M. Horton
Agent for Marketquest, Inc.
118 ½ E. Main Street, Ste. 1
Salem, VA 24153-3805

JUL 12 2005

Dear Ms. Horton:

Subject: Amendment- add additional pests
MarketQuest One Drop Flea & Tick Control
EPA Registration Number 73510-2
Your submissions dated December 6, 2004 and June 3, 2005

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a) As per previous reviews (March 2 and September 1, 2004, Kevin Sweeney) remove the "less than 15 lb" and "15-33 lb weight" class from the label and replace this with "less than 33 lbs" weight class. State the application rate for dogs weighing less than 33 lbs as 1.5mL.
 - b) Remove "Kills and repels the pasture tick (a vector of Lyme disease) for up to 6 weeks!" and "Kills and repels ticks including the brown dog tick and pasture tick (a vector of Lyme disease) for up to 6 weeks!". The pasture tick (*Ixodes ricinus*) is not found in the U.S.. For the addition of "Ticks, which may transmit Lyme disease", submit or cite supporting data on the American Dog Tick (*Dermacentor variabilis*).
 - c) Delete "Protects against blood feeding mosquitoes that may vector heartworm." and "Kills mosquitoes on dogs up to 4 weeks.". The 4 week mosquito claim was not supported since duration of protection was not greater than 6 hours.
 - d) Remove "The product has demonstrated 100% control of fleas within one day of application". The Agency does not permit claims that imply 100% effectiveness or control".

3. Submit three (3) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Enclosed is a copy of the Efficacy Review dated July 6, 2005.

Sincerely,

George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

[FRONT PANEL]



MarketQuest One Drop Flea & Tick Control

[Additional Brand Name(s): No More Fleas & Ticks™ One Drop Control]

FOR DOGS [15 lbs and Under][Between 15 & 33 lbs][Between 33 & 66 lbs][66 lbs & Over]

DO NOT USE ON CATS

Optional Marketing Statements

- CITRUS SCENT
- FLEA AND TICK CONTROL FOR DOGS AND PUPPIES 3 MONTHS [12 WEEKS] OF AGE & OLDER
- KILLS AND REPELS [ADULT] FLEAS UP TO 5 WEEKS [PER APPLICATION]!
- KILLS, REPELS AND PREVENTS RE-INFESTATION OF FLEAS FOR UP TO 5 WEEKS!
- KILLS AND REPELS TICKS FOR UP TO 6 WEEKS [PER APPLICATION]!
- KILLS AND REPELS BROWN DOG TICKS (*Rhipicephalus sanguineus*) FOR UP TO 6 WEEKS [PER APPLICATION]!
- KILLS AND REPELS THE PASTURE TICK (A VECTOR OF LYME DISEASE) FOR UP TO 6 WEEKS!
- KILLS AND REPELS TICKS INCLUDING THE BROWN DOG TICK AND THE PASTURE TICK (A VECTOR OF LYME DISEASE) FOR UP TO 6 WEEKS!
- MONTHLY APPLICATION
- MONTHLY FLEA AND TICK TREATMENT!
- KILLS AND REPELS FLEAS AND TICKS FOR UP TO 5 WEEKS [PER APPLICATION]!
- 3 [4] [5] [6] [9] [12] MONTH SUPPLY
- CONTAINS BITREX
- TRIPLE PROTECTION AGAINST
 - FLEAS
 - TICKS
 - MOSQUITOES
- FLEA, TICK & MOSQUITO TREATMENT
- KILLS MOSQUITOES THAT MAY VECTOR HEARTWORM
- PROTECTS AGAINST BLOOD FEEDING MOSQUITOES THAT MAY VECTOR HEARTWORM
- KILLS MOSQUITOES ON DOGS FOR UP TO 4 WEEKS!

ACCEPTED
with COMMENTS
in EPA Letter Dated
JUL 12 2005
Under the Federal
Fungicide, and Herbicide
Act as amended, for
registration no.
73510-2

ACTIVE INGREDIENT

Permethrin* (CAS #52645-53-1) 45%

OTHER INGREDIENTS 55%

TOTAL 100%

Keep Out of Reach of Children

CAUTION

See back/side/other panel(s) for additional Precautionary Statements.

NET CONTENTS: xx [1 ml (.03 fl. oz.)][1.5 ml (.05 fl. oz.)][3.0 ml (.1 fl. oz.)] [6.0 ml (0.2 fl. oz.)] Applicator

[BACK/SIDE/OTHER PANEL(S)]

**READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS 3 MONTHS OF AGE & OLDER.
DO NOT USE ON CATS.**

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact x-xxx-xxx-xxxx for emergency medical treatment information.

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 eye. Call a poison control center or doctor for treatment advice.
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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, or using tobacco.

Hazards to Domestic Animals: For external use only. Do not apply on dogs less than 3 months of age. Repeat applications may be made as necessary, but do not apply at intervals less than 4 weeks. **DO NOT USE ON CATS.** Cats which actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effect. Do not use this product in households with both dogs and cats. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing animals. Consult a veterinarian before using this product on dogs with known organ dysfunction. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. Signs of sensitivity to this product include skin sensitivity, increased itchiness, redness, rash, hair discoloration or hair loss at the application site. Dogs may also show "lethargy."

Environmental Hazards: This product is extremely toxic to fish and aquatic organisms. Do not apply directly to any body of water. Treated dogs should not be allowed to go swimming for 12 hours following treatment.

PHYSICAL OR 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 USE ON CATS or animals other than dogs. **May be toxic and potentially fatal if applied to or ingested by cats.**

Do not get this product in your dog's eyes or mouth. Repeat applications may be made if necessary, but do not apply more often than once every 4 weeks.

[For Dogs Weighing 15 lbs and Under: (1.0 ml applicator tubes) Apply one tube (1.0 ml) of this product as a spot or stripe to the dog's back between the shoulder blades.]

[For Dogs Weighing Between 15 and 33 lbs: (1.5 ml applicator tubes) Apply one tube (1.5ml) of this product as a spot or stripe to the dog's back between the shoulder blades.]

[For Dogs Weighing Between 33 and 66 lbs: (1.5 ml applicator tubes) Apply one tube (1.5 ml) of this product as a spot or stripe to the dog's back between the shoulder blades and apply a second tube (1.5 ml) as a spot or stripe to the dog's back directly in front of the base of the tail.]

OR

[(3.0 ml applicator tubes) Apply approximately half of the tube (1.5 ml) of this product as a spot or stripe to the dog's back between the shoulder blades and apply the rest of the tube's contents (1.5 ml) as a spot or stripe to the dog's back directly in front of the base of the tail.]

OR

[Apply the entire tube (3.0 ml) as a continuous stripe on the dog's back starting between the shoulder blades and ending directly in front of the base of the tail.]

[For Dogs Weighing 66 lbs and Over: (1.5 ml applicator tubes) Apply one tube (1.5 ml) of this product as a stripe to the dog's back between the shoulder blades and apply a second and a third tube (two 1.5 ml tubes) continuing the stripe down the center of the dog's back and apply a fourth tube (1.5 ml) to the dog's back directly in front of the base of the tail.]

OR

[(6.0 ml applicator tubes) Apply approximately half of the tube (3.0 ml) of this product as a spot or stripe to the dog's back between the shoulder blades and apply the rest of the tube's contents (3.0 ml) as a spot or stripe to the dog's back directly in front of the base of the tail.]

OR

[Apply the entire tube (6.0 ml) as a continuous stripe on the dog's back starting between the shoulder blades and ending directly in front of the base of the tail.]

HOW TO APPLY:

[FOR SARAN TUBES IN BLISTER CARD: Remove product tube from package. Holding tube with notched end pointing up and away from face and body, snap or cut off narrow end at notches. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap tube and put in trash.

OR

[FOR FLAT CARD (doubled) UNIT-DOSE PACKAGING: Separate cards along the perforated line. Holding separated card by its wide end with narrow end pointing up and away from face and body, cut along dotted line. Invert card over dog and use narrow end of the card to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap card and put in trash.]

OR

[FOR FLAT CARD UNIT DOSE PACKAGING: (For push pin type applicator) Remove one product tube from card. With cap end pointed up and away from face and body, depress cap to pierce tube end. Carefully remove cap, invert tube over dog, and with tube in close to dog's skin, squeeze tube to apply product. Wrap empty tube and put in trash.]

OR

[FOR FOLDING CARD OR TABBED CARD UNIT-DOSE PACKAGING: Remove product tab by tearing along perforation. Holding tab with tube end pointed up and away from face and body, cut along dotted line. Invert tab over dog and use narrow end of card to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin.]

OR

[FOR BLISTER CARD WITH TRI-LAYER TUBES: Remove product tube(s) from package. Fold along perforation between tubes and tear off one (or more) tube(s). {Return unused tubes to package.} Holding tube with notched end pointing

6/8

up and away from face and body, snap off (or cut) narrow end at notches. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin.]

[** FOR MULTI-DOSE PACKAGING: Withdraw 1.0 ml (1.5 ml)(3.0 ml)(6.0 ml) of solution at a time. Apply entire given dose directly to the skin at the indicated locations.]

[** FOR DROPPER BOTTLE MULTI-DOSE PACKAGING: Insert dropper tube into insecticide solution, squeeze bulb and then release to fill tube barrel to 1.0 ml (1.5ml)(3.0 ml)(6.0 ml) line. Position dropper tube end in dog's hair next to skin and squeeze bulb to apply all of the solution to the dog's skin as indicated for dog's size.]

[** FOR SALE TO VETERINARIANS ONLY]

Storage: Do not remove tube from the pack until ready to use. Store in a cool (below 25°C) dry place out of reach of children. Do not refrigerate. Protect from direct sunlight.

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 or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

MarketQuest One Drop Flea & Tick Control is an effective and easy to use product. This product has demonstrated 100% control of fleas within one day of application. MarketQuest One Drop Flea & Tick Control kills and repels ticks for up to 6 weeks, and kills mosquitoes on dogs for up to 4 weeks. As with all flea and tick control products, MarketQuest One Drop Flea & Tick Control should be used as part of a program aimed at reducing flea populations in the dog's environment (bedding, carpets, kennel, yard). Consult your veterinarian, entomologist, or retailer for program recommendations.

NOTICE OF WARRANTY

MARKETQUEST, 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.

MarketQuest, Inc.
746 Walker Road, Suite 10-301
Great Falls, VA 22066

TUBE LABEL (folding card and flat card packaging designs)

MARKETQUEST ONE DROP FLEA & TICK CONTROL

PERMETHRIN 45% W/W



KEEP OUT OF REACH OF CHILDREN

CAUTION

**READ DIRECTIONS AND
PRECAUTIONS BEFORE USING**

EPA Reg. No. 73510-2

TAB LABEL (folding card and tabbed card packaging designs)

MARKETQUEST ONE DROP FLEA & TICK CONTROL

ACTIVE INGREDIENTS

Permethrin (CAS #52645-53-1).....45%



KEEP OUT OF REACH OF CHILDREN
CAUTION
SEE MAIN LABEL FOR ADDITIONAL
PRECAUTIONS AND INSTRUCTIONS FOR USE

EPA Reg. No. 73510-2

OUTER BOX LABEL (May contains the following labeling plus full product label)

MARKETQUEST ONE DROP FLEA & TICK CONTROL

4 STEPS FOR COMPLETE FLEA CONTROL

- Step 1- Shampoo or dip your dog.
- Step 2- Treat indoor and outdoor premise with indoor and outdoor sprays, foggers and powders labeled for flea control.
- Step 3- Apply MarketQuest One Drop Flea & Tick Control for up to four weeks adult flea, tick and mosquito control.
- Step 4- Maintenance treatments with on-animal sprays and powders.