



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Division of Advertising Practices

June 1, 2007

Charles Jolly, Esq.
Prestige Brands, Inc.
90 North Broadway
Irvington, NY 10533

Re: Prestige Brands, Inc./Chloraseptic Defense Daily Health Strips
FTC File No. 072-3156

Dear Mr. Jolly:

As you know, the staff of the Federal Trade Commission conducted an investigation of Prestige Brands, Inc. ("Prestige"), for possible violations of Sections 5 and 12 of the Federal Trade Commission Act, 15 U.S.C. §§ 45 and 52. In particular, the investigation concerned Prestige's advertising and promotion of Chloraseptic Defense Daily Health Strips ("Chloraseptic Defense"), a dietary supplement containing vitamin C and zinc in the form of an instant dissolving strip. Our inquiry focused on whether Prestige possessed adequate substantiation for claims that the product boosts the immune system and prevents cold and flu.

Upon careful review of the matter, including non-public information submitted to staff, it appears that no further action is warranted by the Commission at this time. Among the factors we considered in making this determination are the short period of time that Chloraseptic Defense was marketed, the limited nature of the advertising campaign, the relatively small amount of resulting sales, and the fact that Prestige has decided to discontinue the product. It is our understanding that as of the date of this letter, Prestige has discontinued all marketing of the product and ceased distribution of the product to retailers. In addition, you have informed us that Prestige will not re-introduce Chloraseptic Defense for sale in the future.

The staff appreciates Prestige's cooperation in the prompt resolution of this matter. This action is not to be construed as a determination that a violation has not occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

A handwritten signature in black ink that reads "Mary K. Engle".

Mary K. Engle

Associate Director for Advertising Practices

cc: Charles Buffon, Esq.