



November 20, 2009

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To Whom It May Concern:

It has come to our attention that there is some confusion between the active ingredient statements on the labels of SPHERATAX SPH (50 G) and Vectolex CG. Both products are formulations which use corn cob granules as the carrier. The active ingredient used in both products is *Bacillus sphaericus*, Serotype 5a5b, strain 2362. The active ingredient is bound to the granule at a concentration that provides 50 BS ITU/mg. This is confirmed by assay against *Culex quinquefasciatus*. An examination of each product label indicates that to formulate 50 BS ITU/mg into the SPHERATAX SPH (50 G) product requires a 5.0% concentration of the SPHERATAX (*B. sphaericus*) Primary Powder. The potency of the SPHERATAX Primary Powder is 1,000 BS ITU/mg. So $1,000 \text{ BS ITU/mg} \times 0.05 \text{ (5.0\%)} = 50 \text{ BS ITU/mg}$.

In the active ingredient statement of the Vectolex CG you will notice a reference to 7.5% active ingredient concentration. But notice in the parentheses under the *Bacillus sphaericus* statement is a 670 BS ITU/mg reference. This is the potency of the Vectolex Primary Powder from which the 50 BS ITU/mg Vectolex CG corn cob granule formulation is made. The math is the same as for SPHERATAX SPH (50 G), $670 \text{ BS ITU/mg} \times 0.075 \text{ (7.5\%)} = 50 \text{ BS ITU/mg}$. There is absolutely no difference between the potencies of the SPHERATAX SPH (50 G) and Vectolex CG. This is why the labels of both products have the same spectrum of activity and use rates.

Sincerely,



Terry L. Couch, Ph.D.