From:	Dawn Kirby
To:	Benbow, Gene
Subject:	Re: 87942-1
Date:	Friday, June 28, 2013 5:46:10 AM
Attachments:	PestConnect Instruction Manual - Q3 Release 2012_USA_versionFINAL.doc

---

Dear Gene

Final version of the RADAR Pest Connect manual (sub-label B), attached.
Thank you for your assistance, and help with the amendments.

Kind regards

Dawn Kirby
Senior Regulatory Manager

Rentokil Initial
Global Science Centre, 7-8 Foundry Court, Foundry Lane, Horsham. RH13 5PY. UK.

t +44 (0)1403 214106; f +44 (0)1403 214101; w rentokil.com
A Rentokil Initial Company
Registered in England Company No 5393279. Registered Office: 2 City Place, Beehive Ring Road, Gatwick Airport, West Sussex. United Kingdom. RH6 0HA
Information in this message is confidential and is intended solely for the person(s) to whom it is addressed. If you are not the intended recipient, please notify the sender immediately and delete the message from your system.
Please consider the environment before printing this e-mail

On 27 June 2013 18:18, Benbow, Gene <Benbow.Gene@epa.gov> wrote:

> Hi Dawn,
>
> No problem – I've read through the changes and all but one look fine to me (#16 is fine – the explanation makes sense now. Thank you!).
>
> The revised text "this manual is based on the latest information and is provided subject to alteration" needs to be deleted. Any changes made to a pesticide label (other than very minor edits permitted under "non-notification" spelled out in PRN 98-10) need to be submitted to EPA for approval. The way it currently reads suggests that Rentokil can make changes to the label *at will* without submitting labeling to EPA – which is not permitted under FIFRA.

I think I understand what you are getting at, which is that the manual may need to be updated periodically – and the idea that the manual is not "set in stone", but this is true of **all** pesticide labels, making the statement unnecessary.

I hope this makes sense – if you can make this change I'll get the label to John for signature!

Thank you,

Gene Benbow

Biologist, EPA

Insecticides-Rodenticides Branch

Registration Division

http://epa.gov/pesticides/

From: Dawn Kirby [mailto:dawn.kirby@rentokil-initial.com]
Sent: Thursday, June 27, 2013 1:01 PM

To: Benbow, Gene
Subject: Re: 87942-1

Dear Gene

Thank you for sending through the comments for the PestConnect sub-label.

Apologies for the short delay - I need to get some clarification about comment (8) in your email below.

Attached is a clean copy of the PestConnect sub-label, with the specified changes made.

See below for some addition information in response to comment (8). The sub-label was not amended in accordance with comment (8), but we can change it if

necessary.

Please contact me if you need more information, otherwise I look forward to receiving the authorised copies of the new RADAR labels.

Thank you for your prompt attention regarding this application.

Dawn

Dawn Kirby

Senior Regulatory Manager

Rentokil Initial
Global Science Centre, 7-8 Foundry Court, Foundry Lane, Horsham. RH13 5PY. UK.

t +44 (0)1403 214106; f +44 (0)1403 214101; w rentokil.com
A Rentokil Initial Company
Registered in England Company No 5393279. Registered Office: 2 City Place, Beehive Ring Road, Gatwick Airport, West Sussex. United Kingdom. RH6 0HA
Information in this message is confidential and is intended solely for the person(s) to whom it is addressed. If you are not the intended recipient, please notify the sender immediately and delete the message from your system.
Please consider the environment before printing this e-mail

On 19 June 2013 18:39, Benbow, Gene <Benbow.Gene@epa.gov> wrote:

Thank you Dawn! I have just a few label comments for the new sublabel for PestConnect:

1. On the front panel please delete "We reserve the right to change the construction and/or configuration….". These type of changes would have to be reviewed by the Agency. The same thing would apply to any rodenticide bait sold with a bait station (i.e. changes to either the bait or station would have to be reviewed by the Agency).

2. On page 3 please revise "…Technician visits the customer premise's to clear any mice activity" to "Technician visits the customer premise's to clear the RADAR Connect trap….."

3. On page 4 please change "continuous protections" to "continuous protection".

4. On page 5 please change "When an activity" to "When activity".

5. On page 5 please revise "mains" to "AC powered". Actually, go ahead and replace all of the "mains" with "AC powered".

6. On page 10 please revise "so it is important to take time to be happy with the locations you have chosen" to "it is important to position the repeaters in locations that provide a good radio signal".

7. On page 14 please revise "However, radio doesn't like going through metal" to "radio signal doesn't easily pass through metal".

8. On page 16 the statement "It is important to remember that radio waves do not respect building boundaries. Just because a system is all set up in one building won't mean that it will connect that way" reads a bit confusing. I think I understand that you are trying to say that "the system placed in one building may intercept signals from a system placed in *another* building and vice versa". Is that correct? Maybe something like "it is important to remember that signals from one system may affect signals from another system, particularly if the two systems are placed close to each other".

The statement, on page 16 highlights that if PestConnect systems are installed close to each other then the reporting route back to PNOL (Pest Net On Line website) can be via different control panels in different locations depending on site conditions.

The main point to remember is that each detector has a unique bar code which is registered to a particular client and it's specific location on the client's site. In the event that an activation occurs then it does not matter which control panel is automatically selected as the data route back to the PNOL server.

The site installed detectors will always seek out the strongest signal path back to the control panel - so if this is via another local installation then this will not affect the systems ability to register any change of state and report accordingly into PNOL.

Does this clarify the statement? We believe it does not need to be changed - do you agree?

If you can email me a clean label I'll get it to John for stamping! Let me know if you have any questions about these comments.

Thank you,

Gene Benbow

Biologist

Insecticides-Rodenticides Branch

http://epa.gov/pesticides/

From: Dawn Kirby [mailto:dawn.kirby@rentokil-initial.com]
Sent: Wednesday, June 19, 2013 12:39 PM
To: Benbow, Gene
Subject: Re: 87942-1

Hello Gene

Here are the Pest Connect Manuals, as requested.

Sub-label A is the manual for RADAR (non-radio version)

Sub-label B is the manual for RADAR (Pest Connect version).

We would supply the correct part according to which version of RADAR we are using.

Thanks for the email. Have a nice day.

Dawn Kirby

Senior Regulatory Manager

Rentokil Initial
Global Science Centre, 7-8 Foundry Court, Foundry Lane, Horsham. RH13 5PY. UK.

t +44 (0)1403 214106; f +44 (0)1403 214101; w rentokil.com
A Rentokil Initial Company
Registered in England Company No 5393279. Registered Office: 2 City Place, Beehive Ring Road, Gatwick Airport, West Sussex. United Kingdom. RH6 0HA
Information in this message is confidential and is intended solely for the person(s) to whom it is addressed. If you are not the intended recipient, please notify the sender immediately and delete the message from your system.
Please consider the environment before printing this e-mail

On 19 June 2013 13:59, Benbow, Gene <Benbow.Gene@epa.gov> wrote:

Hi Dawn,

I have your amendment to add a new instruction manual for the “PestConnect” unit. I spoke with John about this, and we both think it will be more clear if you can provide 2 separate instruction manuals, “sublabel A” for the current (non-radio) manual and “sublabel B” for the new PestConnect manual.

If you can email me both manuals, each alternately marked “sublabel A” and “sublabel B” on the front page I can review/stamp it for you pretty quickly.

Let me know if you have any questions about this –

Thanks,

Gene Benbow

Biologist

Insecticides-Rodenticides Branch

http://epa.gov/pesticides/

Rentokil Initial plc registered in England No. 5393279
Registered Office: 2 City Place, Beehive Ring Road,
Gatwick. West Sussex. RH6 0HA.

Information in this message is confidential and is
intended solely for the persons to whom it is addressed.
If you are not the intended recipient please notify the
sender and immediately delete this message from your
computer.
This system may be monitored or recorded to
secure the effective operation of the system
and for other lawful purposes.

Rentokil Initial plc registered in England No. 5393279
Registered Office: 2 City Place, Beehive Ring Road,
Gatwick. West Sussex. RH6 0HA.

Information in this message is confidential and is
intended solely for the persons to whom it is addressed.
If you are not the intended recipient please notify the
sender and immediately delete this message from your
computer.
This system may be monitored or recorded to
secure the effective operation of the system
and for other lawful purposes.

Rentokil Initial plc registered in England No. 5393279
Registered Office: 2 City Place, Beehive Ring Road,

Gatwick. West Sussex. RH6 0HA.

Information in this message is confidential and is
intended solely for the persons to whom it is addressed.
If you are not the intended recipient please notify the
sender and immediately delete this message from your
computer.
This system may be monitored or recorded to
secure the effective operation of the system
and for other lawful purposes.