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# **ORIGINAL ARTICLE** Vitamin D3 seems more appropriate than D2 to sustain adequate levels of 250HD: a pharmacokinetic approach

B Oliveri<sup>1</sup>, SR Mastaglia<sup>1</sup>, GM Brito<sup>1</sup>, M Seijo<sup>1</sup>, GA Keller<sup>2</sup>, J Somoza<sup>1</sup>, RA Diez<sup>2</sup> and G Di Girolamo<sup>2</sup>

**BACKGROUND/OBJECTIVES:** The superiority of cholecalciferol ( $D_3$ ) over ergocalciferol ( $D_2$ ) in sustaining serum 25-hydroxy vitamin D (25OHD) levels is controversial. To compare  $D_2$  with  $D_3$  we performed a single-blind, placebo-controlled randomized trial spanning 11 weeks.

**SUBJECTS/METHODS:** Healthy volunteers (n = 33, aged  $33.4 \pm 6$  years) were divided into three groups (n = 11, each): D<sub>2</sub>, D<sub>3</sub> and placebo. Treatment started with a loading dose (100 000 IU) followed by 4800 IU/day (d) between d7 and d20 and follow-up until d77. Serum samples were obtained at baseline and at days 3, 7, 14, 21, 35, 49, 63 and 77.

**RESULTS:** Baseline 250HD values in the D<sub>2</sub> group were lower than those in the D<sub>3</sub> and placebo groups (P < 0.01). Placebo 250HD levels never changed. As after the loading dose both D<sub>2</sub> and D<sub>3</sub> groups had reached similar 250HD levels, we tested equivalence of the area under the concentration × time curve (AUC) between d7 and d77. The AUC was 28.6% higher for D<sub>3</sub> compared with D<sub>2</sub>, and both were higher with respect to placebo. At d77, D<sub>2</sub> 250HD levels were higher than those at baseline, but similar to placebo; both were lower than D<sub>3</sub> (P < 0.04). According to raw data, the elimination half-life of 250HD was 84 and 111 days under D<sub>2</sub> and D<sub>3</sub> supplementation, respectively; after subtracting the placebo values, the corresponding figures were 33 and 82 days.

**CONCLUSIONS:**  $D_2$  and  $D_3$  were equally effective in elevating 250HD levels after a loading dose. In the long term,  $D_3$  seems more appropriate for sustaining 250HD, which could be relevant for classic and non-classic effects of vitamin D.

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#### INTRODUCTION

Vitamin D deficiency is highly prevalent worldwide<sup>1,2</sup> and increases the risk for several medical conditions, including osteoporosis, falls, cancer, diabetes, hypertension, autoimmune diseases so on.<sup>3,4</sup> This led to suppose that maintenance of adequate 25-hydroxy vitamin D (250HD) levels in the blood is required for vitamin D regulation of a large number of physiologic functions beyond the classic actions on bone mineral metabolism.

Different regimens for prevention and correction of vitamin D deficiency have been proposed, but there is no universally accepted dose, frequency, route or type of vitamin D to use or to prescribe.<sup>5–8</sup>

Two chemically distinct natural forms of vitamin D exist: ergocalciferol or vitamin  $D_2$  ( $D_2$ ) and cholecalciferol or vitamin  $D_3$  ( $D_3$ ).  $D_3$  is produced from 7-dehydrocholesterol in human skin exposed to UVB radiation and is present in a few foods (oily fish and egg yolk).  $D_2$  is sourced from UV irradiation of ergosterol, which is mainly found in fungi. Food and/or supplement intake may provide either  $D_2$  or  $D_3$ . Both  $D_2$  and  $D_3$  function as prohormones through metabolism, first in the liver to 25OHD and later in the kidney, where 1 $\alpha$ -hydroxylase converts 25OHD in the active metabolite 1, 25-dihydroxy vitamin D. This process is under homeostatic control.<sup>9</sup>

Serum 250HD levels, including both 250HD<sub>2</sub> and 250HD<sub>3</sub>, are the chief circulating forms of the vitamin and are representative of vitamin D status, reflecting D<sub>2</sub> and D<sub>3</sub> intake and cutaneous synthesis of D<sub>3</sub>. To date, the equivalence of D<sub>2</sub> and D<sub>3</sub> as well as their corresponding doses and administration route remains controversial.

Several reports, but not all, using highly different dosing regimens found  $D_3$  to be more effective than  $D_2$  in increasing or maintaining serum 25OHD levels.  $^{10-21}$  These reports used mainly only a type of supplementation: daily doses, between 1000 and 4000 IU,  $^{10,11,15,17,21}$  a single bolus or intermittent weekly or monthly high doses, with a range between 50 000 and 300 000 IU.  $^{12,14,16,19}$  They had a variable follow-up (from 4 weeks to 1 year). A few of them involved a pharmacokinetic analysis  $^{12,14,19}$  and were controlled with placebo.  $^{15,20}$ 

Taking into account such difficulties, and considering the importance of maintaining adequate 25OHD levels both for classic and for non-classic actions, and the heterogeneity of the published protocols, we designed the present pharmacokinetic study, including two sequential periods of administering  $D_2$ ,  $D_3$  and placebo as one single large loading dose, followed by maintenance daily doses, and later an elimination phase without vitamin D supplementation.

# SUBJECTS AND METHODS

## Study participants

Thirty-three healthy volunteers, 24–46 years old, either hospital employees or physicians, were recruited. None of them had a history of liver, kidney, malabsortive or granulomatous diseases, nor had they received corticosteroids, anticonvulsants or vitamin D supplements. All subjects were from Buenos Aires City (latitude 34°S) and had limited sun exposure (<8 h/ week). This protocol was approved by the Institutional Review Board of the Hospital de Clínicas José de San Martin (the teaching hospital of our university) and, according to current regulations, after approval it was

E-mail: beatrizoliveri@yahoo.com.ar

<sup>&</sup>lt;sup>1</sup>Laboratorio de Enfermedades Metabólicas Óseas, INIGEM-CONICET-UBA, Hospital de Clínicas, Buenos Aires, Argentina and <sup>2</sup>Segunda Cátedra de Farmacología, Facultad de Medicina, Universidad de Buenos, Buenos Aires, Argentina. Correspondence: Dr B Oliveri, Laboratorio de Enfermedades Metabólicas Óseas, INIGEM-CONICET-UBA, Hospital de Clínicas, Av.Córdoba 2351, floor 8th, Buenos Aires 1120, Argentina.

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2

communicated to Argentina's National Drug Regulatory Agency; all volunteers gave written informed consent. This placebo-controlled, parallel-group, randomized interventional study was designed to compare pharmacokinetic characteristics of the two main vitamin D natural forms, and not specific drug products.

#### Pharmacokinetic design

Participants were randomly assigned with a computer-generated code in a single-blind design to receive placebo (PLA),  $D_2$  or  $D_3$  in oral drops in the schedule presented in Figure 1: first, to boost vitamin D concentration, one single loading dose of 100 000 IU at the beginning of the study (baseline), followed by a daily dose of 4800 IU from days 7 to 20, and finally no vitamin D from days 21 to 77, to evaluate mainly the elimination phase. All subjects received an oral dose of 500 mg calcium (one calcium carbonate tablet/day) during the whole study. Fasting blood samples were collected at baseline and at days (d) 3, 7, 14, 21, 35, 49, 63 and 77. Two-hour urine fasting samples were stored at  $-20^{\circ}$  C until processed.

Serum calcium and urine calcium and creatinine (Cr) were measured at baseline, d7 and d21 to evaluate the safety of bolus and daily doses. Hypercalcemia was defined as serum calcium > 10.5 mg/dl and hypercalciuria as a ratio urine calcium/urine Cr > 0.37 mgCa/mgCr.<sup>22</sup> The trial ran from September to December 2010.

#### Procedure

The loading dose was administered by the physicians. Compliance to the vitamin D administration schedule was determined by measuring the residual volume (as number of drops) in the returned vials at day 21.  $D_2$  and  $D_3$  concentrations of the batches used, analyzed blindly by an independent laboratory using High Performance Liquid Chromatography with UV detection, confirmed the label values. The intake of vitamin D was determined by a nutritionist using a food frequency questionnaire.<sup>23</sup>

#### Analytical methods

Serum levels of 25OHD were determined by radioimmunoassay (DiaSorin, Stillwater, MN, USA). All serum 25OHD concentrations for a given individual were determined in a single assay to minimize variability. Intra-assay and inter-assay coefficients of variations were 6% and 8%, respectively. The quality and accuracy of 25OHD analysis were assured by a periodical participation in the Vitamin D External Quality Assessment Scheme (DEQAS). Levels of 25OHD < 20 ng/ml were considered as deficient.<sup>24–26</sup>

Total and bone alkaline phosphatase (measured by agglutination with wheat germ lectin), intact parathormone, serum phosphorus and Cr were measured at baseline and at d77. Calcium, phosphorus, Cr and alkaline phosphatase were determined using standard methods<sup>21</sup> and intact

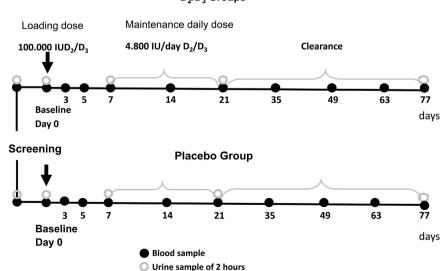
parathormone by electrochemical luminescence (ECLIA) (Roche Diagnostics, Indianapolis, IN, USA).

#### Pharmacokinetic and statistical analyses

Determination of pharmacokinetic parameters ( $C_{max}$ , area under the concentration × time curve (AUC) and elimination half-life) and their statistical analysis were performed using WinNonlin Professional Software version 5.0 (Pharsight Corporation, Mountain View, CA, USA). Applying a noncompartmental model to the log-transformed plasma concentration of 25OHD, pharmacokinetic parameters ( $C_{max}$ , AUC<sub>7-77</sub>) were compared by analysis of variance for a parallel design.<sup>27,28</sup> The Anderson and Hauck test were used to examine equivalence.<sup>29</sup> The ratios and 90% confidence intervals of  $C_{max}$  and AUC<sub>7-77</sub> were calculated for D3/D2 and PLA/D2, and two one-sided *t*-tests<sup>30</sup> were employed to evaluate whether the 90% confidence intervals met the criterion for bioequivalence (80–125%).<sup>28,31</sup> Other statistical analyses were nonparametric tests (Mann–Whitney and Wilcoxon) and analysis of variance (ANOVA), performed, as appropriate, with SPSS 11.0 for Windows (SPSS Inc., Chicago, IL, USA). Significance level was 0.05.

#### RESULTS

As shown in Table 1, the baseline anthropometric characteristics of the subjects of the three groups were similar, with the only exception being the body mass index in the PLA group, which was higher than the corresponding values in the  $D_2$  and  $D_3$  groups (P < 0.01). The three groups had similarly low vitamin D intake from diet: 13 out of the 33 volunteers (39%) presented vitamin D deficiency. The D<sub>2</sub> group presented baseline 250HD values lower than the D<sub>3</sub> and placebo groups (P < 0.01) and with a higher number of subjects with vitamin D deficiency. There were no significant differences among groups with respect to any of the other biochemical parameters evaluated at baseline. Most subjects were adherent to protocol: the mean rates of compliance with treatment, on the basis of drop counts, was  $88 \pm 10\%$ ,  $92 \pm 7\%$  and  $85 \pm 9\%$  for D<sub>3</sub>, D<sub>2</sub> and PLA, respectively. Figure 2 presents the time course of 25OHD levels during treatment. The PLA group had no significant change in their 250HD levels during the 77 days of follow-up. After the loading dose of 100 000 IU the 250HD levels of both vitamin D groups had a rapid and similar increment at d3, which persisted at d7. The absolute increment over baseline was  $20.3 \pm 10.5$  ng/ml in D<sub>2</sub> and  $16.7 \pm 6.4$  ng/ml in D<sub>3</sub> (P = not significant), reaching similar 250HD values ( $D_2$ , 36.6. ± 11.0, and  $D_3$ ,  $41.0 \pm 4.9$  ng/ml; P = not significant). No patient who received the



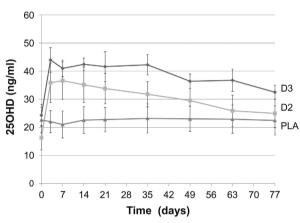
D<sub>2</sub>/D<sub>3</sub> Groups

Figure 1. Design of the study. Three groups of healthy subjects received a loading dose of vitamin D ( $D_2$  or  $D_3$ ) or placebo, followed by a maintenance dose for 2 weeks and a periodic control until d77 of follow-up.

**Table 1.** Baseline anthropometric and nutritional characteristics of thestudy participants

_	Placebo	Vitamin D <sub>2</sub>	Vitamin $D_3$
Number of subjects (n)	11	11	11
Age in years (range)	34.0±5.0 (26–41)	32.2±5.0 (25–41)	33.5 ± 7.0 (24–46)
Sex (female/male)	(8/3)	(9/2)	(8/3)
BMI (kg/m <sup>2</sup> )	$24.5 \pm 2.0^{\#}$	$21.3 \pm 2.0$	$21.8 \pm 2.0$
Vitamin D intake (µg/d) <sup>a</sup>	$3.2 \pm 2.0$	$3.4 \pm 2.0$	$4.3 \pm 2.0$
250HD (ng/ml)	$22.6\pm7.6$	16.3 ± 7.3*	$24.3\pm6.6$
250HD level (n)			
< 20 ng/ml	3	7	5
20-30 ng/ml	7	4	4
≥ 30 ng/ml	1	0	2

Abbreviations: BMI, body mass index; 25OHD, 25-hydroxy vitamin D. Data are expressed as mean $\pm$ s.d., except for sex and number (*n*) of subjects with different vitamin D status. <sup>a</sup>RDA for vitamin D in adults < 70 years: 15 µg/day (600 IU/day). <sup>\*</sup>P < 0.01 vs G3 and placebo. <sup>#</sup>P < 0.01 vs G2 yG3.



**Figure 2.** Time course of 25-hydroxy vitamin D (250HD) levels (geometric mean) during the protocol (from baseline to day 77).

vitamin D loading dose (either D<sub>2</sub> or D<sub>3</sub>) had 25OHD values in the deficiency range. The percentage increment between baseline and d7 was higher in subjects with basal 25OHD values < 20 ng/ml than in those with baseline values  $\geq 20$  ng/ml (179±68% vs 62±36%, P < 0.0001). At d21, after the maintenance dose period, D<sub>2</sub> and D<sub>3</sub> 25OHD levels were similar (33.8±9.2 and 41.9±8.6 ng/ml; not significant).

# Pharmacokinetic analysis

We analyzed the geometric mean of  $C_{max}$  during the course of the study, whereas for AUC we used AUC7-77 days, as at d7 both D2 and D<sub>3</sub> groups had reached similar 250HD levels after the loading dose administered at baseline. We performed an equivalence analysis to test whether the declined rate after stopping vitamin D supplementation was similar between groups, which is shown in Table 2, for  $C_{max}$  and AUC, respectively. According to criteria commonly applied for equivalence, C<sub>max</sub> obtained by the loading dose of  $D_2$  and  $D_3$  was equivalent. In contrast, the  $C_{max}$  for PLA (26.3 ng/ml) was lower than that for both  $D_2$  and  $D_3$ , with a power of 76%. On the other hand, AUCs were not equivalent: neither the  $D_3/D_2$  ratio nor the PLA/D<sub>2</sub> ratio complied with criteria usually employed to check equivalence. The D<sub>3</sub> AUC was 28.6% higher than the  $D_2$  AUC, and the PLA/ $D_2$  ratio was 71.84%, with a power of 71% in both cases (Table 2).  $D_2$  and  $D_3$  AUCs were higher than the PLA AUC. At the end of the protocol (d77), after 56 days without vitamin D supplementation, D<sub>2</sub> 250HD levels were higher than at baseline, but similar to PLA, and both were lower than  $D_3$  (P < 0.04; Figures 2 and 3). With the same software, their

elimination half-lives were calculated with two different approaches: the direct value and after subtraction of the values corresponding to PLA.

The first approach resulted in a geometric mean for the elimination half-life of 25OHD of 84 and 111 days for 25OHD under  $D_2$  and  $D_3$  supplementation. The second approach (aiming to take into account the presence of vitamin D independent of the loading dose) resulted in values of 33 and 82 days, respectively, implying a shorter half-life for 25OHD<sub>2</sub> than for 25OHD<sub>3</sub>.

#### Safety

No subject complained of treatment-related adverse events or experienced hypercalciuria or hypercalcemia at any of the measured points. Serum calcium and urine calcium/urine Cr did not differ in any group and no between-group differences were observed during the period of vitamin D administration (Table 3). The highest individual levels of 25OHD after D<sub>2</sub> or D<sub>3</sub> supplementation were lower than those associated with vitamin D intoxication. In every group, no difference between baseline and final levels was observed for serum calcium, serum phosphorus, serum Cr, alkaline phosphatase, bone alkaline phosphatase, intact parathormone and urine calcium/urine Cr (data not shown).

# DISCUSSION

Herein we have shown that under these experimental conditions vitamin  $D_2$  was as effective as vitamin  $D_3$  in increasing 25OHD levels with a loading dose. On the other hand, after a period with the same daily doses of vitamin  $D_2$  and  $D_3$ , the 25OHD levels in the group that received vitamin  $D_2$  declined faster than the levels in the vitamin  $D_3$  group, reaching similar levels as the placebo group at the final point. This finding is consistent with and expands previous reports, providing additional elements to the current debate about vitamin D requirements and supplementation strategies, if required.

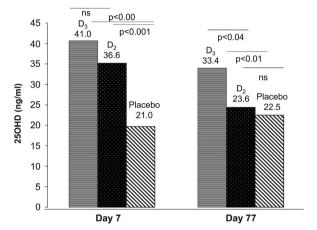
A central point for framing the discussion about the best supplementation is the understanding about the continuous or discontinuous need of some level of vitamin D in blood. In addition to the well-known effect on bone, vitamin D possesses pleiotropic actions on the immune and endocrine systems, and on common cell functions, such as proliferation and differentiation.<sup>4,32</sup> Most of these non-classic effects depend upon the tissue-specific regulation of 1,25(OH)<sub>2</sub>D, which requires adequate blood levels of 25OHD as substrate, suggesting that prolonged or continuous level of 25OHD could be worthwhile.

Many studies have analyzed the difference between vitamins  $D_2$  and  $D_3$ , as well as the effect of dose, route and schedule of administration, over a wide range of ages and follow-up periods. In a recent meta-analysis<sup>33</sup> cholecalciferol obtained a higher response than ergocalciferol in terms of increase and maintenance of 250HD level. Our approach was to compare both calciferols in terms of concentration-time profiles after a loading dose and during a maintenance dose in the order recommended to sustain adequate levels in young adults, as well as in the elimination phase after withdrawal of maintenance.

Unexpectedly, the blind analysis of 25OHD of volunteers after randomization found a lower value in the  $D_2$  group, which prompted us to divide the analysis into two steps: the response to the loading dose and separately, after achieving similar levels of 25OHD, the comparison of both forms of vitamin D in the maintenance and elimination phases. The study began at the end of the Southern winter, and as previously reported many subjects (almost 40%) presented vitamin D deficiency, probably due to low vitamin D intake: only 20–25% of the RDA for adults<sup>24</sup> and lower UV radiation in winter at this latitude.<sup>34,35</sup> The influence of solar radiation and spontaneous intake of vitamin D in the follow-up were probably limited, as the 25OHD levels almost did not change

Pharmacokinetic o	f vitamin	D3	and	D2
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Groups	Geometric mean	90% CI	Comparison	Ratio of geometric means (90% Cl)	Anderson y Hauck (probability < 80 > 125%)	Equivalent	Power
C <sub>max</sub> (ng/ml)							
Placebo	26.31	23.11-31.51	$Placebo/D_2$	56.1% (47.9–65.6)	0.99	No	0.76
Vitamin D <sub>2</sub>	46.92	42.92-52.68	$D_3/D_2$	102.2% (87.25–119.33)	0.01	Yes	0.76
Vitamin $D_3$	47.87	45.30-50.93					
AUC 7-77 days							
Placebo	1669.7	1446.43-2066.51	Placebo/D <sub>2</sub>	71.84 (60.3-85.5)	0.60	No	0.71
Vitamin D <sub>2</sub>	2324.1	2114.71-2627.81	$D_3/D_2$	128.6 (108.0–153.1)	0.85	No	0.71
Vitamin $D_3$	2988.2	2836.99-3167.98					



**Figure 3.** Comparison of the  $D_2$ ,  $D_3$  and placebo groups' serum 25hydroxy vitamin D levels (250HD) on day 7 (1 week after the vitamin D loading dose) and day 77 (end of follow-up).

in the PLA group over the course of the study. Subjects were equally adherent to protocol and no safety problems were detected. As expected, the loading dose of either vitamin D guickly and markedly increased 25OHD levels at d3 and maintained them in the first week. Some of the reports, with follow-up up to a week after the loading dose, found persistence with both vitamins<sup>19,20</sup> and others only with vitamin D<sub>3</sub>.<sup>12,14</sup> Such discrepancies could involve several factors, including the size of the groups, intra-individual variation or non-registered vitamin D supplementation.<sup>6,20</sup> As a trend, the increase was higher in cases whose baseline values were lower. Further studies should determine whether compensatory mechanisms to accelerate vitamin D hydroxylation are involved. On the other hand, after reaching optimal values of 25OHD, maintenance doses of each vitamin D (4800 IU) effectively sustained those levels during the 14 days of supplementation. The dose used is very close to the daily utilization rate (4000 IU) reported for young adults at levels in the order of 32 ng/ml.<sup>36</sup> 25OHD plasma profiles after supplementation with either  $D_2$  or  $D_3$  are controversial: two reports, using the same dose level as us, found higher concentration values with vitamin D<sub>3</sub>, independently of the baseline value (whether deficient or not). In contrast, a report using 1,000 IU/day did not find any difference between  $D_2$  and  $D_3$ .<sup>15</sup> In our study,  $D_3$  AUC (a good measure of drug exposure after systemic administration) was 28% higher than D<sub>2</sub> AUC. This finding was consistent, although lower, with previous reports with different loading doses and follow-up: all found higher AUC for  $D_3$  (between 56 and 340%).<sup>12,14,19</sup> Consistent with previous reports, our main finding is the faster decrease in 250HD serum concentration for D<sub>2</sub> supplementation

with respect to D<sub>3</sub>, resulting in a longer elimination half-life for 25OHD<sub>3</sub>. Such a difference can result from differences in the volume of distribution or in the clearance: both have been described for D<sub>2</sub> and D<sub>3</sub> The pharmacokinetics of vitamin D is highly complex and method limitation can add further complexity: for instance, RIA detects several 25-hydroxylated derivatives of vitamin D, such as 1,25(OH)<sub>2</sub>D, which, being relatively low and with a fast elimination, can marginally affect the values we measured. RIA does not distinguish between 250HD<sub>2</sub> and 250HD<sub>3</sub> , although the sharp increase after the loading dose can logically be ascribed to the vitamin D (either D<sub>2</sub> or D<sub>3</sub>) used. Moreover, as the time periods involved are long, many regulatory mechanisms can be in function. As to the volume of distribution (which is directly proportional to the elimination half-life) vitamin D Binding Protein depicts higher affinity for 25OHD<sub>3</sub> than for 25OHD<sub>2</sub>.<sup>37–39</sup> In healthy adults, supplementation with 50 000 IU/week of D<sub>3</sub> produced 2 to 3-fold greater storage of vitamin D in subcutaneous fat biopsies than did equimolar  $D_2$ .<sup>19</sup> 250HD clearance is essentially determined by a highly complex network of metabolic transformations held in many different tissues. The main component<sup>40</sup> is 1a-hydroxylation by CYP27B1, whose expression is upregulated by PTH and downregulated by its product 1,25(OH)<sub>2</sub>D. This active metabolite is short-lived, in part due to its high ability to induce CYP24A1, which is also detected in many organs. This enzyme can also metabolize 250HD, although with an affinity that is one order lower. Hypothetically, such a lower affinity can become relevant at higher concentrations of substrate. Thus, differences in the metabolic rate by different enzymes, together with changes in the level of these enzymes, can be involved in our findings. Further studies are required to elucidate the relative contribution of each mechanism in vivo, at different dose levels of vitamins D.

A different AUC among vitamin D-supplemented subjects could be clinically relevant if adequate levels of 250HD were continuously required. If this were the case, vitamin D<sub>3</sub> use could be a better option. The rationale for a need of continuous 250HD is currently insufficient, although some evidence suggests that such levels are worthwhile, in particular for non-classic vitamin D effects, which seem mediated via localized autocrine or paracrine synthesis of 1,25(OH)<sub>2</sub>D depending on the adequacy of 250HD levels.<sup>4,19,32,41</sup> A lower tissue exposure to 250HD after D<sub>2</sub> supplementation should result in a proportionally lower synthesis of 1,25(OH)<sub>2</sub>D, in comparison with a similar dose of D<sub>3</sub>. However, further determinants can be also relevant; i.e. besides 250HD level, the concentration of intact vitamin D delivered to tissues is important for 1,25(OH)<sub>2</sub>D synthesis, either for classic or for non-classic vitamin D effects.<sup>42</sup>

In summary, under these experimental conditions, loading doses of  $D_2$  or  $D_3$  were similar with respect to increasing 250HD.

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	Placebo		Vitamin D <sub>2</sub>		Vitamin D <sub>3</sub>		Inter-groups	
	sCa	uCa/uCr	sCa	uCa/uCr	sCa	uCa/uCr	Р	
Basal	9.5 ± 0.3	$0.08 \pm 0.04$	9.5 ± 0.4	$0.09 \pm 0.03$	9.5 ± 0.3	0.08±0.10	NS	
d7	9.6 ± 0.4	$0.10 \pm 0.07$	9.5 ± 0.2	$0.12 \pm 0.06$	9.5 ± 0.4	$0.07 \pm 0.02$	NS	
d21	9.6 ± 0.2	$0.08 \pm 0.04$	9.6 ± 0.4	$0.10 \pm 0.04$	9.7 ± 0.3	$0.08 \pm 0.06$	NS	
Р	NS	NS	NS	NS	NS	NS		

After a maintenance period with the same daily doses, in the D2-supplemented group 25OHD levels declined faster than in the D3 group, reaching similar 25OHD levels than placebo at the final point. In the long term, vitamin  $D_3$  seems more appropriate to sustain adequate levels of 25OHD, which could be relevant for classic and non-classic effects of vitamin D.

#### **CONFLICT OF INTEREST**

The authors declare no conflict of interest.

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