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January 11, 2016

Dr. Stephen Ostroff, M.D.

Acting Commissioner

United States Food and Drug Administration

10903 New Hampshire Avenue

Silver Spring, MD 20993

Re: Docket No. FDA-2015-N-1765 for “General and Plastic Surgery Devices: Restricted Sale, Distribution, and Use of Sunlamp Products.”

Dear Dr. Ostroff,

On behalf of the Prevent Cancer Foundation, the only national nonprofit in the United States dedicated solely to cancer prevention and early detection, we appreciate the opportunity to submit comments in support of the proposed rule FDA-2015-N-1765. This rule, preventing anyone under the age of 18 from using an indoor tanning facility, and requiring adults to regularly receive and sign acknowledgements of the risks of indoor tanning, is a critical step in preventing new skin cancers and should be finalized and implemented.

The use of a sunlamp in a tanning bed or tanning booth greatly increases the risk of skin cancers of all types. The American Academy of Dermatology states that people who do so are 59% more likely to develop melanoma, the deadliest type of skin cancer, than those who have never used an indoor tanning facility, while even one indoor tanning session can increase the chance of developing the more common squamous cell and basal cell skin cancers by 67% and 29% respectively. Beginning indoor tanning before the age of 18 can significantly increase these risks. Given these risks, banning indoor tanning for those under the age of 18 is an important step in cancer prevention.

The proposed rule would also require adults to receive a document outlining the risks of using a sunlamp for indoor tanning upon their first usage of the any tanning facility, and again for every 6 months. This rule is needed as many people may not currently know the risks of indoor tanning, and a study done by the United States House of Representatives Energy and Commerce Committee and released in February of 2012 showed that many employees of indoor tanning facilities do not themselves know the potential adverse health effects inherent in indoor tanning and often misrepresent them. In this study, 90% of facility operators claimed that indoor tanning presented no dangers, and, when pressed on skin cancer in particular, more than half stated that indoor tanning did not increase the risks of skin cancer.

The study by the U.S. Representatives demonstrates clearly that many people are unaware of the increased chance of developing cancer from indoor tanning, and that they are not receiving correct information from the facilities’ themselves. Given the potential danger from even one indoor tanning session, however, and that the UVA and UVB rays used are known carcinogens, it is imperative that anyone wishing to use an indoor tanning facility be fully aware of the risks. Requiring customers to receive written documentation of the warnings, and requiring a signature to show they have read it, would help to ensure that more customers make a fully informed decision.

In light of the increased risk of cancer from indoor tanning, we strongly support the proposed rule, FDA-2015-N-1765, and encourage this rule to be finalized and implemented. Thank you for the opportunity to comment.

Sincerely,

Carolyn Aldigé

President and Founder