October 11, 2018

Division of Oral Health
Centers for Disease Control and Prevention
4770 Buford Highway, MS S107–8
Atlanta, Georgia 30341

Re: Docket No. CDC-2018-0064

To Whom It May Concern:

On behalf of our 161,000 dentist members, we are pleased to comment on the Centers for Disease Control and Prevention’s (CDC) proposed guidance for the operational control range for optimal fluoride concentration in municipal water systems. We offer these comments in response to your Federal Register notice of July 13, 2018 (83 FR 32666).

The ADA supports the proposed operational control range of 0.6 mg/L to 1.0 mg/L for the target fluoride level of 0.7 mg/L recommended by the U.S. Public Health Service (USPHS). The low end of the range (0.6 mg/L) will allow for the public to enjoy the decay preventive effect of fluoridated water while the high end (1.0 mg/L) will help to reduce the occurrence of dental fluorosis.

This range is feasible and practical for water systems based on historical studies and most recently a 2017 study that looked at data from 34 states.₁ We appreciate that even the best managed water system cannot maintain a perfect level of 0.7 mg/L 24/7/365. The operational control range of 0.4 mg/L allows for maintenance of a therapeutic average over time.

The ADA has noted that some water systems have mistakenly interpreted the USPHS target of 0.7 mg/L to be highest level of fluoride to be allowed in drinking water at any given time. Besides creating anxiety for water system personnel, these systems have set their target fluoride level at 0.5 mg/L or lower simply because they do not want to exceed 0.7 mg/L at any specific time.

The proposed operational control range will help to clarify expectations of fluoride level management and will aid in states setting regulations for the management of their water systems. Once finalized, the ADA looks forward to a revision of the 1995 Engineering and Administrative Recommendation for Water Fluoridation,² as well as increased educational opportunities for water system personnel and regulators.

Fluoridation of community water supplies is the single most effective public health measure to prevent tooth decay. The ADA continues efforts to expand access to fluoridation as it works to meet the Healthy People 2020 goal of providing fluoridated water to 79.6 percent of the U.S. population on public water systems.
Thank you for providing us the opportunity to comment. If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org. Information is also available at ADA.org/fluoride.

Sincerely,

/s/ Joseph P. Crowley, D.D.S.  
President

/s/ Kathleen T. O'Loughlin, D.M.D., M.P.H.  
Executive Director

JPC:KTO:rjb
