



October 10, 2018

Dr. Valerie Robison
Division of Oral Health
Centers for Disease Control and Prevention
4770 Buford Highway, MS S107-8
Atlanta, GA 30341

Re: Docket No. CDC-2018-0064, *Proposed Guidance Regarding Operational Control Range Around Optimal Fluoride Concentration in Community Water Systems that Adjust Fluoride*

Dear Dr. Robison,

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to provide comments on the Center for Disease Control and Prevention’s (CDC) *Proposed Guidance Regarding Operational Control Range Around Optimal Fluoride Concentration in Community Water Systems that Adjust Fluoride*. AMWA represents the largest metropolitan, publicly owned drinking water systems in the nation and collectively our members serve more than 130 million people.

AMWA appreciates CDC’s work in developing an optimal control range for fluoride to correspond with its recommendations for an optimal fluoride concentration for community water fluoridation. CDC has based this number on available data related to both the concentration of fluoride shown to prevent tooth decay and the ability of water systems to control variation in fluoride concentrations. AMWA supports using best available science, as was done in this case, when developing guidance of this nature. It is AMWA’s understanding that once this optimal range is finalized, the 1995 guidance, *Engineering and Administrative Recommendations for Water Fluoridation*, will be reviewed and updated as necessary. AMWA would like to stress the importance of updating this guidance as soon as possible as water plant operators rely on these recommendations for day-to-day operation. AMWA encourages CDC to engage with drinking water utilities throughout this process.

Thank you for your consideration of these comments. If you have any questions, please contact Stephanie Hayes Schlea (schlea@amwa.net), AMWA’s Manager of Regulatory and Scientific Affairs.

Sincerely,

Diane VanDe Hei
Chief Executive Officer

cc: Peter Grevatt, Director, Office of Ground Water and Drinking Water
Eric Burneson, Director of Standards and Risk Management, Office of Ground Water and Drinking Water

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Diane VanDe Hei