



June 23, 2015

Barton Bonn, President  
American Suntanning Association  
PO Box 1907  
Jackson, MI 49204  
bonnbart@gmail.com  
apmillerlaw@aol.com

Dear Mr. Bonn:

We have reviewed your information quality appeal related to the CDC website dated February 3, 2015. The Information Quality Appeal you submitted stated that the following heading and paragraph are incorrect: *“A **Base Tan Is Not a Safe Tan**. There is a common misconception that a tan acts as the body’s natural protection against sunburn. The Burning Truth: A tan is the body’s response to injury from UV rays, showing that damage has been done. A ‘base tan’ only provides a sun protection factor (SPF) of about 3 or less, which does little to protect you from future UV exposure.”*

We respectfully decline the request to remove the statement, because it is scientifically supported and consistent with U.S. Federal government recommendations regarding effective skin protection. The U.S. Food and Drug Administration recommends a Broad Spectrum Sunscreen with SPF values of 15 or higher to reduce the risk of skin cancer.<sup>i</sup> Although an SPF of “3 or less” is minimal protection, a broad-spectrum sunscreen with an SPF of 15 or greater provides more protection.<sup>ii</sup> The CDC language is consistent with FDA recommendations and U.S. Department of Health and Human Services materials.<sup>iii</sup>

If you wish to appeal this response to your request for correction, you may submit a written appeal or electronic request for reconsideration within 30 days of receipt of our response. The appeal must state the reasons why the agency response is insufficient or inadequate. You must attach a copy of your original request and the agency's response to it. Also, clearly mark the appeal with the words, "Information Quality Appeal" and send the appeal to [InfoQuality@cdc.gov](mailto:InfoQuality@cdc.gov) or to the following address:

Centers for Disease Control and Prevention  
Management Analysis and Services Office  
1600 Clifton Road, NE, Mailstop F-07  
Atlanta, Georgia 30333 Fax: (770) 488-4995

Sincerely,

Lisa C. Richardson, MD, MPH  
Director  
Division of Cancer Prevention and Control

cc:

Greta M. Massetti, PhD, Associate Director for Science, DCPC  
Samuel F. Posner, PhD, Associate Director for Science, NCCDPHP

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<sup>i</sup> U.S. Food and Drug Administration, U.S. Department of Health and Human Services. Sunscreen drug products for over-the-counter human use. Code of Federal Regulations Title 21, Volume 76, Number 117, Parts 201, 310, and 352. (June 17, 2011). Fed Regist. 2011. <http://www.gpo.gov/fdsys/pkg/FR-2011-06-17/html/2011-14766.htm>.

U.S. Food and Drug Administration. FDA Sheds Light on Sunscreens. U.S. Food and Drug Administration website. <http://www.fda.gov/forconsumers/consumerupdates/ucm258416.htm>.

<sup>ii</sup> U.S. Food and Drug Administration. Sunburn protection factor (SPF). U.S. Food and Drug Administration website.

<http://www.fda.gov/aboutfda/centersoffices/officeofmedicalproductsandtobacco/cder/ucm106351.htm>.

<sup>iii</sup> U.S. Department of Health and Human Services. The Surgeon General's Call to Action to Prevent Skin Cancer. Washington, DC: U.S. Dept of Health and Human Services, Office of the Surgeon General; 2014.