

January 30, 2007

Michael D. Shelby, Ph.D.
CERHR Director
NIEHS
P.O. Box 12233, MD EC-32
Research Triangle Park, NC 27709

Re: Delta Dental Plans Association comments to the Draft Expert Panel Report for Bisphenol A
(December 15, 2006)

Dear Dr. Shelby:

The Delta Dental Plans Association (DDPA) would like to take this opportunity to respond to the request published in the Federal Register (Vol. 71, No. 238/Tuesday, December 12, 2006/Notices) for public input on the draft "NTP-CERHR Report on the Reproductive and Developmental Toxicity of Bisphenol A."

DDPA commends the panel for its comprehensive and objective review of the literature relating to the potential contribution of bisphenol A (BPA) from dental sealants and composites. Our claims data has shown that dental sealants are one of the most effective preventive benefits we are able to provide.

The public controversy surrounding early reports on the potential estrogenicity of dental sealants has been fueled by much confusion and misinformation. Many people in both the public and scientific communities have made the incorrect assumption that all dental sealants and composites contain BPA, and that these materials constitute a significant body burden of BPA. The draft report correctly characterizes the potential for exposure from dental sealants as being an "acute and rare event". The published research has shown that BPA exposure is primarily related to a single sealant product and that no composite has been shown to release significant amounts of BPA. Furthermore, the increased levels of BPA from that one sealant product were only detectable for very short periods of time.

We hope that in your final report the summary and conclusions will continue to emphasize dental exposure to BPA as being very rare and short-lived. This will go a long way towards dispelling the misperception that dental sealants and composites pose a risk to reproductive health.

Sincerely,



Sheila Riggs DDS, DMSc
Chair, DeltaUSA Dental Policy Committee

cc: Kim Volk, President & CEO DDPA