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VICE PRESIDENT PRODUCT DEVELOPMENT AND QUALITY ASSURANCE

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October 7, 2003

Dockets Management Branch Food and Drug Administration HFA-305 5630 Fishers Lane, Room 1061 Rockville, MD 20857

Re: Docket Number 78N-0038

Dear Sir or Madam:

This letter is sent on behalf of BASF in support of their UVB absorber Uvinul T-150, which is also known as Octyl Triazone. Beiersdorf has been using Uvinul T-150 as a UVB filter in sun protection products marketed outside the US for over five years without unusual adverse event experience in the respective product category.

Based on the positive experience that Beiersdorf Europe has had due to the use of this ingredient, we are in full support of BASF Time & Extent Application (TEA) to add another choice to the sunscreen monograph. We believe there is an overall benefit to the US economy to introduce another sunscreen into the market. We urge you to add this material in order to increase the number of choices of sun protection products available to the US public.

We wish to reiterate our support of BASF's TEA based on the good performance of Uvinul T-150 in skin and sun care formulations, as well as for the overall public health benefits that the addition of a new and effective active ingredient will bring to the end consumer.

Please expedite the review of the BASF TEA as you give it your careful consideration.

Sincerely

Alexandra Kowcz Vice President

Product Development & Quality Assurance

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