

THE WASHINGTON D.C. DERMATOLOGICAL SOCIETY

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12/14/06
Food and Drug Administration
ATTN: Division of Dockets Management
5630 Fishers Lane, Room 1061, HFA-301
Rockville, MD 20852

RE: 1978N-0065, RIN 0910-AF53

To whom it may concern:

On behalf of the Washington DC Dermatological Society, I would like to express our opposition to the proposed rule change in docket number 1978N-0065, RIN 0910-AF53.

Hydroquinone(HQ) is one of the most effective molecules for the treatment of pigmented discoloration of the skin over the past 40-50 years and has been used in millions of people. It is used to treat many top concerns among our patients to include melasma, photo-aging, post-inflammatory hyperpigmentation, medically and cosmetically disfiguring dyschromias.

Since 1961, hydroquinone has demonstrated a safe and effective profile among clinicians prescribing or recommending hydroquinone products to their patients. In spite of human exposure to natural sources of hydroquinone in wheat, pears, berries, coffee, tea, onions, rice and red wine, there is not an association with carcinogenicity. There have been no reported cases of related malignancies in more than 50 years of manufacture and use of HQ.

There is no substantial basis for the FDA's claims against the use and distribution of hydroquinone-containing products. On behalf of the membership of the Washington DC Dermatological Society, representing dermatologists in Maryland, Virginia, and Washington DC, I urge you to oppose the proposed rule change regarding hydroquinone.



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78N-0065

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