

From: Samuel Houtkin
Sent: Friday, March 26, 2004 3:10 PM
To: CONTACTLENSRULE
Subject: Contact Lens Rule, project #R411002

As a practicing Optometrist I can understand the FTC's desire to protect the patient consumer. If this rule is passed, patients will be able to obtain lenses more easily but the sellers of these lenses would not be regulated by any agency. Optometrists, Ophthalmologists and Opticians are subject to regulations in each state. They must take competency examinations and obtain a certain number of hours in continuing education in order to maintain their licenses. With regard to mail order contact lens salespeople or companies, there is no regulation. Any person can set up a company and sell contact lenses through the mail. A contact lens is a drug that requires a prescription. Why are they treated differently from medical drugs? Misuse of contact lenses can result in eye injury or loss of vision. Current prescriptions should be required for their sale, but there would be no agency to verify this nor are the sales agents qualified to sell them. Please to not pass this legislation. The labeling on contact lenses reads "Federal law restricts this device to sale by or on the order of a licensed practitioner". Let's leave contact lenses to the FDA where it should be.