

**From:** Mike Malone  
**Sent:** Monday, April 05, 2004 5:39 PM  
**To:** CONTACTLENSRULE  
**Subject:** Contact Lens Rule, Project No. R411002

April 5, 2004

**TO:** FTC  
**FROM:** DR. MICHAEL MALONE  
**RE:** CONTACT LENS RULE, PROJECT NO. R411002

I respectfully ask that the Federal Trade Commission trade rule strongly address the importance of not substituting different brands of contact lens from what is prescribed. My second concern is that the trade rule needs to address the importance of honoring expiration dates for prescriptions, which is essential to monitor wearing schedules by patients and decrease the risk of harm to our patients.

Lenses approved for extended wear are an example of lenses where substitutions should not be made. All lenses approved for extended wear have different characteristics. Some have drastically more oxygen permeability than others. Some have materials that demonstrate a higher microbial adherence than other lenses. Even if the lenses have identical diameters and base curves, the peripheral curves of the lens may be significantly different or, more importantly, fit differently on the patient. Lenses that don't allow for tear exchange increase the risk of inflammation or infection, especially in extended wear. Thus, a contact lens supplier's substitution of one brand for another could have significant effects on the patient's ocular health.

Likewise filling expired prescriptions or allowing patients to purchase extra lenses to extend their time between visits can have a negative impact on the patient's eye health. The patient is not always aware of changes in their ocular health. Wearing contact lenses decreases corneal sensitivity making patients less aware of discomfort that may be an early signal that something is wrong. I believe that regularly scheduled examinations allow for early intervention (i.e., changing wear schedules, cleaning regimens, lens parameters) that may prevent problems from developing -- or at least limit the damage.

Thank you for your consideration.