

Public Comments Provided to the
FTC Contact Lens Study
(project # V040010)
by
Charles W. Kissling, O.D.

Ks.

I am an optometrist practicing in Kansas, and wish to provide comments for the "Contact Lens Study". Specifically, I would like to comment on questions 8, 14, &15.

Question 8. "Are there differences in the prices charged for similar contact lenses by online and offline merchants?"

I can not speak to prices for the entire optometric community, because I have not done a price survey of my colleagues. However, I can speak to my own prices for contact lenses as compared to the posted prices of 1-800 Contacts (an online merchant). Online merchants often claim to provide a 50% savings on contact lens purchases, compared to buying them from a doctor. In general, I think that claim is grossly exaggerated and misleading to the consumer.

When I first began to compare my prices to those of 1-800 Contacts two years ago, I found that I was actually lower priced. At that time, I sold a box of Acuvue contact lenses for \$22.50, while 1-800 Contacts sold the same product for \$22.95.

On June 1, 2004, I did a price comparison of 4 popular products. The results are below.

<u>Product</u>	<u>My price</u>	<u>1-800 Contacts price</u>
Acuvue	\$22.50/box	\$19.95/box
Acuvue 2 Colors	\$35.00/box	\$34.95/box
Acuvue Bifocal	\$40.00/box	\$39.95/box
Focus 1-2 Week	\$22.50/box	\$22.45/box

As you can see, 3 of the 4 products that I looked at were virtually identical in price. One of the 4 products could be purchased at a 12% savings from 1-800 Contacts. I think a larger comparison would provide similar results, with many products similarly priced, and other products showing a 10% to 15% savings if purchased from 1-800 Contacts. Certainly, any claims of a 50% savings would be misleading to the consumer.

Question 14. “Please comment on the incidence of brand name and custom label contact lens prescriptions.”

100% of the contact lens prescriptions I write specify a brand name. As yet, there are no “generic” contact lenses produced by different manufacturers. Some contact lens manufacturers, however, will produce one product under multiple brand names, but this is the exception, not the rule. In Kansas, if I prescribe a contact lens which is marketed under multiple names, I am required by law to state on the prescription the name under which that lens is generally recognized.

I do not prescribe any custom label contact lenses.

Question 15. “What are the benefits of contact lens prescriptions that specify a brand name or custom labeled contact lenses?”

When I prescribe a contact lens by brand name, I know exactly what my patient will be wearing. There are many factors that affect the fit of the contact lens, and thus the impact of the lens on the health of the eye. For instance, the material, thickness, diameter, base curve, edge design, manufacturing method, optic zone diameter, and peripheral curves all affect the fit of the contact lens on the eye. Lenses differing by any one of these areas will fit differently on the eye, and hence may have an adverse affect on the health of the eye. A lens made by different manufacturers may behave differently on the eye even if made of the same material, base curve and diameter. At present, there are no “generic” contact lenses. The closest thing to generic lenses would be a lens that a manufacturer sells under different names.

By specifying a brand name on my contact lens prescription, I am insuring that my patient is wearing the same lens that I have followed on their eye, and know to be healthy for them.