

November 1, 2012

Federal Trade Commission/Office of the Secretary
600 Pennsylvania Avenue, NW
Room H-113 (Annex X)
Washington, DC 20580

Re: Pet Medications Workshop, Project No. P12-1201

To Whom It May Concern:

I am General Counsel of 1-800 CONTACTS, our country's largest direct seller of replacement contact lenses. I thank the Commission for permitting me to participate in its workshop on pet medications held on October 2, 2012, and appreciate having the opportunity to submit these comments.

Introduction

The marketplace for pet medications looks a lot like the contact lens marketplace before the federal government stepped in to promote competition and consumer choice. We either observed, or participated in these efforts by the federal government, and I would like to take this opportunity to elaborate on three things we learned from our experience:

1. When the government requires a consumer have a prescription before purchasing a product, it must also take steps to give consumers the freedom to choose where they purchase the product, and to allow them to benefit from competition;
2. Laws, regulations or policies which call on prescribers to issue copies of prescriptions "By Request" of the consumer do not work. They are unenforceable. They are discriminatory. They put consumers in the middle of a conflict of interest. They create an unfair playing field between those doctors who freely release prescriptions and those who do not. They discourage choice, since doctors can ask for a fee or a waiver in exchange for releasing the prescription.
3. Giving consumers their prescriptions and the right to choose where they fill them will save consumers money, assure them better service, meet their needs for convenience and promote better health.

Background on the Contact Lens Industry

Twenty years ago, consumers had no right under federal law to copies of their own contact lens prescriptions. Even if consumers could get copies, they were limited in their ability to shop around on those prescriptions as there was evidence contact lens manufacturers and

optometrists were colluding to lock in consumers, and prevent them from purchasing from alternative channels.

Today, contact lens consumers have a right to a copy of their prescriptions automatically – without having to ask, pay, or sign a waiver. They can fill that prescription at the retailer of their choice. When that retailer is someone other than their prescriber, they have a right to have that prescription verified.

Actions Taken To Bring Competition and Choice to the Contact Lenses Market

How did we get here? There are a number of touchpoints:

1. The Eyeglass Rule. In 1978, the Federal Trade Commission (“FTC”) promulgated the Ophthalmic Practice Rules, widely referred to as “the Eyeglass Rule,” giving eyeglass wearers the right to automatically receive copies of their prescriptions without having to ask, pay a fee, or sign a waiver.¹ In promulgating this Rule, the FTC found a lack of awareness on the part of consumers that they could choose to purchase their eyeglasses from a retailer other than their prescriber.²

Automatic prescription release remains the most cost effective and efficient means of providing consumers with notice that they have a choice to fill the prescription from a retailer other than the prescriber -- a key factor cited by the FTC when it decided, in its systematic review concluded in 2004, to retain the release requirement. As the FTC noted, “[i]n the absence of automatic release... consumers may not know to ask for their prescription.”³

During the workshop, testimony was received regarding the practice engaged in by many veterinarians of either charging a fee, or requiring the signing of a waiver, in exchange for release of the prescription. The FTC may wish to recall that in promulgating the Eyeglass Rule, it found that “[b]y far the most frequent practice employed to discourage consumers from shopping elsewhere is the charging of a fee for the prescription. . .if the consumer requests his prescription.”⁴

The Commission also expressed concern with the practice which “involves the conditioning of the release of a prescription on the signing of a waiver of liability.” The use of such a waiver, the FTC found, could “have a significant impact on the consumer’s decision whether to take

¹ See 16 C.F.R. PART 456—OPHTHALMIC PRACTICE RULE.

² Ophthalmic Practice Rules: Request for Comments 62 FR 15865, 15866 (April 3, 1997).

³ Also, “release of prescriptions enhances consumer choice at minimal compliance cost to eye care practitioners.” Ophthalmic Practice Rules, Final Rule, 69 FR 5451, 5453 (February 4, 2004).

⁴ Advertising of Ophthalmic Goods and Services, Statement of Basis and Purpose and Final Trade Regulations Rule. 43 FR 23992, 23998 (June 2, 1978).

his prescription elsewhere,” and “have the effect of making consumers erroneously believe that other dispensers are not qualified. . . .”⁵

2. Actions by the State Attorneys General. In 1996, Attorneys General from 32 states⁶ and a national class of consumers brought an action against the American Optometric Association and the major contact lens manufacturers for conspiring to impede competition from alternative sellers.⁷

The Attorneys General charged that, no longer content to engage in anticompetitive practices alone, eye care professionals and their trade associations coerced manufacturers into colluding with them by threatening to boycott manufacturers who would not agree to bar direct distribution of their lenses to alternative sellers such as online companies, pharmacies and big-box retailers. The state Attorneys General also had evidence that the defendants’ anticompetitive practices caused substantial economic injury to consumers.⁸

The parties eventually settled, with the manufacturers agreeing to abandon their restrictive distribution policies and the American Optometric Association agreeing that it would not make claims that ocular health is impacted by the channel from which consumers purchase their replacement lenses.

3. Testimony by the FTC Staff. In 2002, the FTC staff testified in a regulatory proceeding in Connecticut, and proposed the use of a passive verification system. The FTC also documented how the cost to a consumer in time and travel in picking up lenses from a brick and mortar store could exceed the dollar cost of the lenses themselves.

Specifically, the FTC calculated that an hour long trip to a mass merchandiser had “an implicit time cost of between \$10.96 and \$26.00,” which represented “a markup of between 50 and 130 percent over the cost of a multipack.” Of note is that the calculation was based on 2001 average wage rates. Presumably, when current wage rates are considered, the premium would be significantly greater.⁹

⁵ Advertising of Ophthalmic Goods and Services, Statement of Basis and Purpose and Final Trade Regulations Rule. 43 FR 23992, 23998 (June 2, 1978).

⁶ Plaintiff States included: Alabama, Alaska, Arizona, Arkansas, California, Connecticut, Delaware, Florida, Idaho, Illinois, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nevada, New Jersey, New York, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Texas, Utah, Virginia, West Virginia, and Wisconsin.

⁷ *In re: Disposable Contact Lens Antitrust Litigation*, MDL 1030 (M. D. Fla.).

⁸ See Declaration of Douglas F. Greer on Behalf of the Thirty-One Plaintiff States, *In re: Disposable Contact Lens Antitrust Litigation*, Case No. MDL 1030 (M.D. Fla.), May 1999 ([Att. 58](#)); see also Douglas F. Greer, Ph.D., Supplemental Declaration on Damages in the Contact Lens Case, March 2001 ([Att. 59](#)); *Nationwide Survey of Contact Lens Wearers*, SRI Consulting, Apr. 27, 1999 ([Att. 60](#)).

⁹ Comments of the Staff of the Federal Trade Commission, Intervenor, In Re: Declaratory proceeding on the Interpretation and Applicability of Various Statutes and Regulations Concerning the Sale of Contact Lenses, State of Connecticut Department of Public Health, Connecticut Board of Examiners for Opticians. (March 27, 2002)

4. The Fairness to Contact Lens Consumers Act. In 2003, Congress enacted the Fairness to Contact Lens Consumers Act (P.L 108-164) (“FCLCA”), guaranteeing consumers the right to automatically receive copies of their prescriptions and the right to have those prescriptions verified when purchasing from retailers other than their prescribers. In 2004, the FTC issued its Final Rule implementing the Act.

We are concerned, however, that despite the clear provisions of the Act and its implementing Final Rule, that many eye care professionals may be ignoring the legal requirement that they automatically release prescriptions to their patients. A survey of optometrists reported upon on January 1, 2008, by the magazine Contact Lens Spectrum found that: “despite [the FCLCA], only half of the respondents replied “yes, to every patient” when asked if they release contact lens prescriptions.”¹⁰

The idea that prescribers may be flaunting the prescription release requirement is not without precedence. In its 2004 review of the Eyeglass Rule, the FTC found that “[t]he evidence in the record, however, suggests that some eye care practitioners continue to refuse to release eyeglass prescriptions, even though this conduct has been unlawful under the Rules for nearly twenty-five years.”¹¹

We urge the FTC to study whether there is, as suggested by the Contact Lens Spectrum survey, inconsistent compliance with the prescription release requirements of the FCLCA and its implementing Final Rule, and take appropriate action to assure full compliance.

5. End to Restrictive Distribution. In 2005, Congress considered legislation to bar restrictive distribution of prescription contact lenses, and held hearings on the issue.¹² Soon after, the largest manufacturer of restrictive distribution lenses agreed to drop this discriminatory practice, effectively ending it in the industry.

Impact on Consumers

Today, consumers have the right to a copy of their contact lens prescription without having to ask, pay or sign a waiver, and can take that prescription to be filled by any retailer.

What’s been the impact on consumers? They are saving money. They are buying more lenses. They have more choices. And they have benefited from technological advances.

¹⁰ Contact Lens Spectrum Magazine, Annual Report, Contact Lenses, 2007.
<http://www.clspectrum.com/articleviewer.aspx?articleid=101240>

¹¹ Ophthalmic Practice Rules, Final Rule, 69 FR 5451, 5453 (February 4, 2004).

¹² H.R. 5762/S. 2480 would have required contact lens manufacturers to make its lenses available on a nondiscriminatory basis to prescribers; entities associated with prescribers; and alternative channels of distribution. An amendment proposed to HR 2744 (the Agriculture Appropriations Bill) by Sen. Robert Bennett (R-UT) would have barred the use of federal funds by the Food and Drug Administration to approve any new lenses unless the manufacturer of those lenses certified that it was distributing its lenses in a non-discriminatory without regard to whether the retailer was a prescriber.

First, they have saved money. In 2004, when the FTC issued its Final Rule implementing the FCLCA, our price at 1-800 CONTACTS for the most popular lenses in America, Acuvue 2 lenses, was \$19.95/box. Today, our price is \$18.99 for our customers who buy a year supply. Those who purchase in lesser quantities pay \$20.99, which is still less than the 2004 price in 2012 constant dollars of \$24.83.

Following is an advertisement run a few weeks ago by one of our competitors, JCP Optical. They are selling these same lenses today for only \$16/box. Also attached is another advertisement where these lenses are being sold for \$12.50, followed by a picture taken this past week at a Wal-Mart parking lot in Pennsylvania in which these lenses are being advertised for \$14.99.

HAVE YOU SEEN ME?



NAME: Brandi Krajewski
FROM: Nipton, CA
DOB: 09/13/80 **AGE:** 32
HAIR: Brown **EYES:** Brown
SEX: Female
HT: 2' 5" (at age 2) **WT:** 32 lbs. (at age 2)
DATE MISSING: 10/09/82



Photo age-progressed to 32 years

Thank you for caring about kids

RedPlum® and The National Center for Missing & Exploited Children®

CALL THE TOLL-FREE HOTLINE: 1-800-THE-LOST® (1-800-843-5678) 24 hours a day or report a sighting online: missingkids.com



optical

set your sights on two

2 pairs of eyeglasses only in september* **\$99**

no-line bifocals \$34 more per pair
single vision, clear scratch-resistant lenses and any frame up to \$120

don't forget the contacts

acuvue® 2™ box of contacts only in september \$16**



soflens® 90-pack daily disposable contacts only in september \$32**



Call 1-877-jcpeyes or visit jcpennyeoptical.com **jcpennney**

We accept thousands of vision care plans. call today for your annual eye exam or bring in your Rx. *Complete pair purchase required. Both pair must be for same prescription and customer. Some exclusions may apply. Additional charge may be applied for strong Rx. Bifocals and/or progressives, specialty lenses and lens options are additional. **Valid prescription required. Contact lenses not available in AR and RI. See optician for details. Cannot be combined with any other offer, vision care plan, package pricing or prior orders. Void where prohibited by law. Eye exams performed by independent state licensed Doctors of Optometry. Offer valid 9/1-9/30/12. MKT CODE: VAL

CONTACT LENSES

GO

Top Selling Brands

- Acuvue
- Air Optix
- Biofinity
- Expressions
- Focus
- Frequency
- Freshlook
- Proclear
- PureVision
- Soflens
- Sofmed

Contact Lens Types

- Daily Disposable
- 1-2 Week Disposable
- 1-3 Month Disposable
- Conventional (Vial)
- Toric
- RGP (Oxygen Permeable)
- Colored and Tinted
- Bifocal

Contact Lens Manufacturers

- Bausch & Lomb
- Ciba Vision
- Cooper Vision
- Johnson & Johnson (Vistakon)

Contact Lens Accessories

- Contact Lens Cases
- Reading Glasses

BUY CONTACT LENSES TODAY!



ACUVUE® 2™
\$12.49*
PER BOX

ACUVUE® OASYS™
\$26.87*
PER BOX

*Eyecare Club® membership required.
Based on an annual supply purchase with manufacturer rebate.

rollover image to pause

SAVE MONEY, SEE BETTER, AND ENJOY THE CONVENIENCE OF ORDERING ONLINE.

Buying contact lenses at America's Best Contacts can save you money - and buying them here online can save you money AND time. We have a complete selection of lenses, including every brand and contact type you would expect to find - at the same great low prices. As long as you have a valid prescription, you can order them whenever you like and we'll ship them right to you.

Get FREE SHIPPING when you order 4 boxes or more, or spend over \$50.

Don't have a valid prescription? [Click here to schedule an Eye Exam at an America's Best Store near you.](#)

JOIN THE EYE CARE CLUB



- **FREE EYE EXAMS for 3 yrs.**
- **Contacts From \$12.49 per box**
- **10% off contacts and eyeglasses**

[Click here for more club details.](#)

NEED AN EYE EXAM?

Schedule one today at **America's Best.**

SCHEDULE AN EXAM

Popular Contact Lenses



Sofmed 55
From \$12.49 / Box



Sofmed Breathables
From \$23.75 / Box



ACUVUE 2
From \$12.49 / Box



ACUVUE OASYS
From \$29.27 / Box after rebate



Sofmed Toric
From \$24.99 / Box



Sofmed 1-Day (90 Pack)
From \$37.49 / Box



ACUVUE Oasys for Astigmatism
From \$38.74 / Box after rebate



FreshLook ColorBlends
From \$40.49 / Box



ACUVUE Advance
From \$26.99 / Box



AIR OPTIX NIGHT & DAY AQUA
From \$52.48 / Box after rebate



Expressions
From \$35.99 / Box



ACUVUE Advance for Astigmatism
From \$44.99 / Box

low prices on
contact lenses



\$14.99*
per box

Vision Center

brought to you by Walmart

*Requires 2020 prescription and eye exam from optometrist. Price good while supplies last. Price may vary by location. ©2019 Wal-Mart Stores, Inc. All rights reserved. See store for details.

In 2004, we submitted to the FTC as part of the agency’s review of the contact lens market, the following chart listing average prices through the various channels for three kinds of contact lenses; toric (for astigmatism); color; and common spherical lenses.

Contact Lens Price Comparison 2004			
Channel	Focus Toric	FreshLook Colorblends	Acuvue 2
Mass Merchandisers	\$53.21	\$35.40	\$18.05
Optical Retail Chains	\$66.69	\$42.09	\$22.85
Independent Optometrists	\$70.91	\$46.67	\$24.39
Ophthalmologists	\$73.18	\$46.54	\$25.74
Average of ECPs	\$67.87	\$44.43	\$23.31
1-800 CONTACTS	\$59.00	\$34.95	\$19.95

Source: 1-800 Contacts, Comment #1, at 17-1 8 and Attach. 23 as reprinted in FTC Report “The Strength of Competition in the Sale of Rx Contact Lenses: An FTC Study, February, 2005.

The next chart compares our current prices on these products to what we charged in 2004:

Contact Lens Pricing at 1-800 CONTACTS

Product	2004 (found in FTC Study)	2004 price in 2012 constant dollars ¹³	Current Pricing
Acuvue 2 (6pk)	\$19.95	\$24.83	\$18.99/ea. for annual supply or \$20.99/ea
Focus Toric ¹⁴	\$59.00	\$73.43	\$49.99/ea for annual supply or \$57.49/ea
FreshLook Colorblends (6pk)	\$34.95	\$43.50	\$39.49/ea for annual supply or \$46.99/ea

¹³ Based on annual CPI increases for medical care commodities

¹⁴ Current comparable product is “Air Optix for Astigmatism”.

As this comparison illustrates, the vast majority of contact lens wearers (those not wearing specialized color lenses) are spending less today than they did for those lenses in 2004. When inflation is taken into account, even those wearing color lenses are paying less today for an annual supply than they did when the FCLCLA went into effect.

Consumers are buying more contact lenses. In 2003, the largest manufacturer of contact lenses, Johnson & Johnson, had vision care revenues of \$1.271 billion. Since then, revenues have more than doubled – to \$2.9 billion. J & J has seen a 16% increase in just the past two years.

With the market for contact lenses opened up, manufacturers have been forced to compete. Instead of investing in just their relationships with prescribers, they invested in the kinds of things manufacturers do in a competitive market – in advertising, marketing and in product innovation.

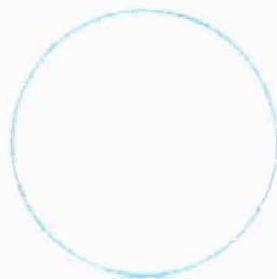
Since enactment of the FCLCA, we have seen the development of and popularization of lenses made of silicon hydrogel, and the spread in the use of daily disposable lenses (which promote ocular health since they are replaced daily).

Back in 2003, as indicated in our product brochure, we sold 37 different brands and types of disposable lenses. Today, 1-800 CONTACTS sells 91 different brands and types of disposable lenses.

And innovation continues. Following is an advertisement placed in the September issue of Contact Lens Spectrum by Bausch and Lomb promoting its new technology for daily wear lenses.

First there was Hydrogel

Then Silicone Hydrogel






Now there's Biotrue™

NEW!

Introducing Biotrue™ ONEday lenses.

The first daily to feature HyperGel™ material for comfortable vision throughout the day.

-  Meets the oxygen level the open eye needs
-  Matches the water content of the cornea
-  Mimics the lipid layer of the tear film

BAUSCH+LOMB

Bio
true™



ONEday lenses
inspired by the
biology of your eyes™

©2011 Bausch + Lomb. All rights reserved.

Learn more. Visit bausch.com

BAUSCH+LOMB

See better. Live better.

Impact on Optometry

When the Fairness to Contact Lens Consumers Act was considered by Congress, claims were made by some opponents that creating competition in the sale of replacement contact lenses would (1) result in transfer pricing, with exam prices increasing to compensate for lost product sales, and (2) harm optometry as an industry.

In calendar year 2008, the median exam fee for new spherical contact lens patients was \$181. In 2009, the median fee had increased to \$198. But the median exam fee then fell to \$185 in 2010, where it remained for calendar year 2011-- representing an increase of only \$4 per exam since 2008.¹⁵

For exams given to non-contact lens wearers, the median fee in 2008 was \$107. In 2009, the median fee increased to \$115, where it has remained each year since. Consumers who shop around can find even more competitive prices. Following are advertisements offering such exams for \$39 in one case, and in another for \$69.95 bundled with two pairs of eyeglasses.¹⁶

¹⁵ Key Metrics of Optometric Practice, 2009, 2010, 2011 and 2012 editions.

¹⁶ Id.; also, advertisements for America's Best Contacts & Eyeglasses and Hour Eyes Doctors of Optometry.

Savings of over \$66 in this issue

HOUR EYES®
DOCTORS OF OPTOMETRY

2 for
\$99



Choose any 2 frames up to \$69.95, with plastic, single-vision, bifocal or progressive lenses.

Includes adult frames priced up to \$69.95 with clear, single-vision or multifocal, plastic lenses and kids' frames priced up to \$69.95 with clear, single-vision, impact-resistant lenses. Lens treatments and specialty lenses are additional. Offer expires 11/3/12.



OR A SINGLE PAIR FOR



\$49.95

Includes adult frames priced up to \$69.95 with clear, single-vision, plastic lenses and kids' frames priced up to \$69.95 with clear, single-vision, impact-resistant lenses. Lens treatments and specialty lenses are additional. Offer expires 11/3/12.



We Welcome Hundreds of Insurance Plans
FEP BlueVision, Davis Vision, Advantica, OptumHealth Vision (Spectera), MAMSI, TRICARE, NVA (National Vision Administrators)



Ask About
our money-back guarantee and unbeatable price match!



We Accept
any doctor's prescription

For locations visit www.houreyes.com
www.houreyesva.com

plus GRAND OPENING:

RESTON
11130 South Lakes Dr.
(703) 476-0077

Hour Eyes, Inc., Staffed By Doctors of Optometry Licensed in Washington, D.C. and/or State of Maryland.

Hour Eyes Doctors of Optometry, P.C. Owned & Operated By Doctors of Optometry Licensed in the State of Virginia.

ONE COUPON PER PATIENT

\$39 EYE EXAM
Eye exams available from Licensed Optometrists

This coupon entitles the bearer to a complete eyeglass examination for \$39 at participating locations except where prohibited by law. Contact lens exam additional. Some restrictions apply. Coupon must be presented at time of appointment. Offer expires 11/3/12.

A NEWS CORPORATION COMPANY

www.smartsource.com

News America Marketing (800) 727-2695

Search

Find A Store/
Schedule Eye Exam

Zip Code

OR

City

State

GO

OR

Call 1-800-TWO-PAIR
(896-7247)

ALL STORE LOCATIONS

2 pairs of complete glasses for
\$69.95*
including a **FREE** eye exam
*with single vision plastic lenses

MORE INFO

Bifocal Glasses: 2 Pairs + FREE Eye Exam For \$99.95**

GREAT PRICES ON CONTACTS

BESTCONTACTS.COM



PURCHASE CONTACTS NOW

RAY-BAN SUNGLASSES



Now carrying Ray-Ban®, including the Wayfarer®.

LEARN MORE

VIRTUAL TRY ON



LEARN MORE

Virtual Try On
Browse Hundreds of Frames
Find Your Next 2 Pair Now!

Follow us:



America's Best has The Best Prices in Sight - and is THE best way to save money on seeing better. You'll always spend less and receive more [LEARN MORE](#)

© 1999-2012 America's Best Contacts & Eyeglasses. All rights reserved.

Quick Access

- Find a Store
- Browse Eyeglasses
- Schedule Exam
- Join The Club
- Eyeglasses Blog
- Contacts Blog

Customer Service

- I Need Help
- Contacts Questions
- Eyeglass Questions
- FAQ
- Buy Contacts
- Careers

America's Best

- About Us
- Privacy Policy
- Terms of Use
- HIPAA Notice
- Contact Us
- Sitemap

America's Best Contacts & Eyeglasses

With over 300 locations nationwide, America's Best Contacts & Eyeglasses is the perfect solution to your vision needs. We are America's largest volume purchaser of designer eyeglasses frames, which means we can offer you amazing deals that nobody else can match!

At America's Best, we care about the health of your eyes as well as your vision. That's why we offer FREE eye exams* performed by licensed optometrists with the purchase of two pairs of glasses*! We make getting an appointment easy: just walk in or [schedule your eye exam online](#) !

Visit one of our [America's Best locations](#) today to view our incredible selection of designer eyewear at low prices you won't find anywhere else!

Pairs of Glasses for \$69.95 Deal

At America's Best, you can get two pairs of complete single vision glasses for the everyday low price of \$69.95*! In addition, when you purchase two pairs of new glasses, you can get an

In terms of the health of the eye care business, Contact Lens Spectrum reported in January 2008, that the “ophthalmic sector as a whole” grew “250 percent” over the previous five years, which, it noted was “far ahead of the S&P 500”, and concluding that the contact lens industry had been “graced with growth and product innovation”.¹⁷ The same publication reported in its annual report for 2009 (during the depths of the recession), that as of “September 2009, the ophthalmic sector as a whole was up 44 percent year-to-date... far ahead of the S&P 500.”¹⁸

The next year, the publication proclaimed in its annual report for 2010 that “[m]arket and survey data show that the industry remained largely unaffected in 2010 by the state of the economy” reporting that while “the economy ha[d] been challenging for many [in optometry]. . . the market again appear[ed] to be weathering the storm,” and that “the ophthalmic sector as a whole remained strong.”¹⁹

The report found “[t]here was a marked slowdown in the ophthalmic market starting in the fourth quarter of 2008, with improvement through 2009 and into 2010,” concluding that “[t]he contact lens industry remains healthy” A year later, in its annual report for 2011, the publication reported that despite the slow growth in the general economy “the contact lens market remained healthy in 2011, with U.S. sales growing 5 percent through the third quarter.”²⁰

Conclusion

Years of focus and dogged effort on the part of governmental players – the Federal Trade Commission, the Congress, and the state Attorneys General – has succeeded in injecting competition and choice into the market for replacement contact lenses, transforming the market to the benefit of all involved – consumers, eye care professionals, retailers and manufacturers.

There is no reason to believe that the market for pet medications will respond any differently. I am hopeful that the FTC’s workshop, and the solicitation of public comments, marks the beginning of a similar process, and not the end, so that all Americans who own pets – and that is most of us – can get a chance to benefit as have contact lens consumers.

Sincerely,

R. Joe Zeidner
General Counsel
1-800 CONTACTS

¹⁷ Annual Report 2007, Contact Lens Spectrum, January 2008.

¹⁸ Annual Report 2009, Contact Lens Spectrum, January 2010.

¹⁹ Annual Report 2010, Contact Lens Spectrum, January 2011.

²⁰ Annual Report 2010, Contact Lens Spectrum, January 2009. Also, Annual Report 2011, Contact Lens Spectrum, January 2012.