

FLAUM EYE INSTITUTE

Department of Ophthalmology
Department of Neurobiology & Anatomy
Department of Brain & Cognitive Sciences
Center for Visual Science



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To whom it may concern,

I am a vision scientist with expertise in physiological optics, neuroscience as it pertains to vision and the study of visual perceptual learning induced by visual training. I have nothing but the highest respect for the quality of the science performed by Aaron Seitz. I am also Director of Research at the Flaum Eye Institute, Rochester, NY where I oversee many examples of translational research moving out of the lab and into practice, for the benefit of our visually impaired patients. These patients would be horrified to see the FTC's ruling on Seitz and Carrott.

Over 40 individuals, many of them experts in vision research, perceptual and motor learning, have posted on this site in reaction to the FTC's accusations against Aaron Seitz and Carrott. They have already explained why the FTC's statements that research not involving large-scale, double-blinded, placebo-controlled studies is invalid and thus, that no claim can be made that perceptual learning approaches improve vision, are both ill-informed and incorrect.

I believe that if allowed to stand, this decision will go against our basic civil liberties as scientists. The fact that the FCT is screening and redacting comments posted on its site in response to this judgment already feels like censoring, and therefore a breach of our right to free speech.

This decision will negatively impact vision science in this country. It discourages scientists from venturing outside of their University labs to translate their research into concrete applications that attempt to benefit the public. This in turn, runs directly counter to what the US government funding agencies have been telling scientists to do over the last decade. Visual perceptual training research, as a means of enhancing/improving vision in humans and animals, is funded by the National Institutes of Health (NIH) and the National Science Foundation (NSF). In the case of the NIH, our grant applications are encouraged and even judged by how translatable our research is to the benefit of human health. Yet now, we learn that if we attempt to pay more than lip service to this requirement, we will be accused like criminals and slammed down with hefty fines that approximate a typical scientists' yearly salary.

I hope that the FTC can see reason, and reverse their ruling in the case of Seitz/Carrott. I would strongly suggest that they consult with the FDA and the NIH on this matter. The FDA has considerable expertise regulating the translation of biomedical research into practice. It is highly respected by scientists, doctors and the public and unlike the FTC in this case, it seeks out scientists and LISTENS to them when considering what to do about new devices or drugs.

For instance, the requirement that Carrott should have run a large-scale, double-blinded, placebo-controlled trial is actually unlikely to be feasible in the context of visual perceptual learning.

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This is not a pharmaceutical that you can make into little white pills, some of which contain the drug and some of which don't. We are talking here about using things that people can see. It is therefore hard – if not impossible - to make them into a placebo. In fact, research may be needed to figure out exactly how to deceive people in the context of visual learning.

None of this denies that there is a need for regulations to control the quality of science-derived “brain-enhancing” products on the market. However, if the FTC is serious about dealing with this scourge, it should enlist and LISTEN to scientific experts. It should consult with the FDA and NIH and work in tandem with these two institutions rather than trying to undo their hard work and accomplishments while reinventing the proverbial wheel. Ultimately, the FTC should generate policies that incentivize scientists to bring the fruits of their research to the public in a principled manner rather than penalize innovation.

Sincerely,


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