

Unfortunately, nothing proposed actually helps patients but appears to be a wish list for online retailers. First and foremost, the average cost of glasses being near \$300 is completely irrelevant. Low-end retailers are readily available for those who wish to spend \$99 on 2 pairs of glasses. The length of time a glasses prescription is good for should be determined by your provider, not by interests of online retailers who can profit by simply filling the same prescription time and again. If the length of time a prescription is good for is to be changed, then it should be done with good evidence from peer-reviewed studies, not simply due to dollars for a special-interest group that donates campaign cash.

Next, I have written tens of thousands of glasses prescriptions throughout my career, and not one of them has had a PD (pupillary distance) noted. Why, you ask? Because that is something an optician measures to fit your glasses. It is done by the dispenser, not the provider. The online retailers simply want to use the information from paid employees of the provider or independent retailers at no cost to them, so they can save money on not having to employ opticians to properly fit glasses. If a patient wants to measure the PD himself or herself and take the risk of the glasses not fitting properly, then that is their prerogative. If this was such a great concern for the online retailers, then they can employ their own opticians at places they provide service and measure it themselves. This doesn't fit their business model, so they want that done for them (they claim done for their customer) at no cost. Competition is good, but this is not competition. It is changing the way medicine is practiced to fit the business model of a special interest group.

Third, we as providers are already required to provide a copy of the prescription to the patient at no additional cost, and we (at least where I practice) always do this. Any ethical provider should do this, as the patient has the right to shop where he or she desires.

Fourth, if you read many of the responses, they are all simply "canned" replies. I even saw one that cut and pasted the response but didn't change the "x" years to a number to show how long they have had their prescription without it changing. Having continual eye exams and continuity of care is important for good outcomes. If a patient decides to not have regular eye exams at the recommended interval, then that patient bears the risk involved. I understand not everyone can afford to have a yearly eye exam, but that should not be used as an excuse to fund online retailers. Needing more than 1 year to shop for a pair of glasses is laughable.

I recommend that those considering this regulation to actually visit a licensed optician and see what they do. Glasses are more expensive when purchased in person for a reason, there is value added for a proper fit. I am not advocating banning online retailers, as they are simply competition, but this regulation does not do that. It appears to be written solely for the purpose of making more business for the online retailers, not the patient. The biggest contention I have with this is providing the PD, as it is simply something providers do not perform, as it is not our job to do that. It is the job of the dispenser.