



# California Optometric Association

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October 25, 2015

Donald S. Clark  
Federal Trade Commission  
Office of the Secretary  
600 Pennsylvania Avenue NW  
Suite CC-5610 (Annex C)  
Washington, DC 20580

**RE: 16 CFR Part 456: Ophthalmic Practice Rules (Eyeglass Rule) FTC Project No. R511996**  
**#00494**

Dear Mr. Clark,

The California Optometric Association (COA) represents doctors of optometry across the Golden State. The mission of COA is to support and advance the profession of optometry to assure quality health care for all Californians. COA appreciates this opportunity to offer comment on the Eyeglass Rule.

The Eyeglass Rule was intended to enhance competition in the market for eyeglasses by creating a right of patients to receive a copy of their eyeglass prescriptions from their eye doctors. While we have a shared commitment to promoting healthy vision and quality patient care to meet the wide range of patients' specific vision care needs, the FTC should consider deferring to applicable state laws on eyeglass prescription requirements. California has its own distinct laws regarding eyeglass prescriptions. It is logical to defer to each state's respective laws that specify eyeglass prescription requirements.

Doctors of optometry in California do much more than prescribe eyeglasses and contact lenses. Over the past 20 years, optometric doctors have expanded their training and licensure to diagnose and treat many eye diseases, including glaucoma. Vision screening alone does not result in a prescription for eyeglasses. Eye tests administered to oneself or online do not include all components of a comprehensive eye examination and may miss important health risks and conditions.

Furthermore, the FTC can improve competition in the market for eyeglasses, to the benefit of consumers, by ensuring that consumers continue to have the option to get high quality products and services from doctors of optometry. The FTC should take action against sellers who use unfair or deceptive tactics, such as providing substandard materials or products that do not meet federal standards.

Thank you for the opportunity to comment on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "David Redman".

David Redman, OD  
Chair, Legislation and Regulation Committee  
California Optometric Association