

January 30, 2017

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW., Suite CC5610 (Annex C)
Washington, DC 20580

RE: Contact Lens Rule, 16 CFR part 315, Project No. R511995

Secretary Clark,

I write to support the amendments to the Contact Lens Rule, 16 CFR Part 315 proposed in the December 7, 2016 Federal Register. *See* 81 Fed. Reg. 88526. Broadly speaking, these changes will further improve the level of transparency and trust between patient and provider and promote good eye health. Moreover, the proposed changes will advance the original purpose of the Fairness to Contact Lens Consumers Act, “[t]o provide for availability of contact lens prescriptions to patients, and for other purposes.” *See* 15 U.S.C. § 7601 (Pub. L. 108-164).

As a consumer of corrective eye products, I understand the asymmetry of information that exists between consumers and professionals, even despite the efforts of Congress and the Federal Trade Commission (the Commission) to correct this imbalance. It was many years before I understood that a prescription is intended to be portable. My prescription has never been offered to me at the end of an eye exam. Rather, I have had to request a copy of the prescription, and I have been made to feel like it was outside the norm every time. I strongly agree with the Proposed Rule’s requirement in § 315.3 (c)(1) for professionals to seek a signed statement on the part of consumers that they have actually received a copy of the prescription. *See* 81 Fed. Reg. at 88559. In my case, in particular, this would have been extremely useful, and could have saved me a great deal of money over the many years before I knew this was a possibility.

The gradual unbundling of eye care services and products from eye care providers has been a positive shift for consumers. If history is any guide, increasing competition among providers will lead to efficiencies of scale, market innovation, and ultimately lower cost (and increased access) for consumers. This will in turn lead to better eye care for consumers by lowering the burden to maintain proper eye health. Now that three of the five members of my family require corrective eye products, the ability to compare products and make informed decisions is critical.

I am encouraged by the recent work of the Commission to increase transparency and empower consumers to make good decisions about their eye health, and I urge the Commission to continue to adapt these rules as the market evolves.

Thank you,

Eric Lacey