



Ohio Vision
Professionals Board

April 5, 2018

Ohio Vision Professionals Board
77 S. High Street, 16th Floor
Columbus, OH 43215

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Commissioners:

The Ohio Vision Professionals Board is the regulatory body charged with overseeing the practices of ophthalmology, opticianry, and optometry and protecting the citizens of Ohio. Thank you for allowing us the opportunity to provide comment on the proposed changes to the Contact Lens Rule.

The core of our opposition to the proposed rule changes is simply put—these rules do nothing to protect the consumer. Contact lenses are a medical device and extending the prescription expiration window beyond a year threatens the safety of patients and their eye health. Quality care and patient health and safety must remain the top priority.

In addition to not addressing patient safety, the proposed rules increase the administrative burden for prescribers and their staff with no foreseeable advantage to increase patient choice and access to the distribution of contact lenses. We stand in support of policies that support the rights and safety of patients while not creating an undue burden for prescribers and dispensers.

The Commission's own complaint data shows that doctors and dispensers comply with the law. These proposed changes do nothing to address the fact that sellers of contact lenses have frequently engaged in business practices that exploit loopholes in federal statutes to the detriment of patients. These proposals distract from the real issue of patient safety. This stands in direct opposition to the stated dual mission of the FTC to "protect consumers and promote competition." These changes would remove protective policies for consumers and ultimately decrease competition. Should the proposed rules be adopted, the Commission would be failing at both of its missions.

We strongly urge you to listen to the nation's eye care professionals and reconsider your review of the Contact Lens Rule with patient safety as the supreme priority.

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Sincerely,

Ohio Vision Professionals Board

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