

April 6, 2018

Federal Trade Commission
Office of the Secretary
Constitution Center
400 7th Street SW, 5th Floor, Suite CC-5610 (Annex F)
Washington, DC 20024

**Comments of Consumers Union
Contact Lens Rule
Follow-up to Public Workshop on Proposed Rulemaking
16 CFR Part 315, Project No. R511995**

Consumers Union, the policy division of Consumer Reports, submits this supplementary comment in the above-referenced matter, in follow-up to the Public Workshop held March 7. As explained more fully in our previous comments, we believe the Contact Lens Rule is significantly benefitting consumers, by enabling them to comparison shop for contact lenses, for lower cost and greater convenience for a health necessity that can be a significant family budget expense.

Prior to attending the Public Workshop, we submitted comments and recommendations in the September 2015 Periodic Review¹ and in the December 2016 Notice of Proposed Rulemaking.² We believe those comments and recommendations continue to be sound, and urge the Commission to give them full and fresh consideration in conjunction with the information it has obtained from the Workshop. We are hopeful that the Workshop has provided renewed impetus, on all sides, for reaffirming the Contact Lens Rule and improving its functioning.

Respectfully submitted,



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Consumers Union

¹ <http://consumersunion.org/wp-content/uploads/2015/10/ContactLensRuleFTCCComments.pdf>.

² <http://consumersunion.org/wp-content/uploads/2017/02/FTC-Contact-Lens-Rule-CU-comments-1-30-17-FINAL.pdf>.