

Vision Arora

April 6<sup>th</sup>, 2018

Dear FTC Commissioners:

*I am a Doctor of Optometry providing essential frontline eye health and vision care in my home community of Dallas, Texas.*

*There is no justification for targeting eye doctors—optometrists and ophthalmologists—and our patients with new paperwork and document storage requirements as your misguided Contact Lens Rule proposal would do, while the Commission allows retailers who blatantly violate the law to operate unchecked. Your agency's own complaint data confirms that doctors comply with the law, a finding that Members of Congress have specifically recognized in Congressional hearings with FTC officials and further affirmed on March 23<sup>rd</sup> through passage of 2018 government funding legislation (Public Law 115-141) and the following report directive:*

*Contact Lenses—The [Senate Appropriations] Committee is disappointed in the FTC's decision not to include the proposed patient safety improvements related to the prescription verification process in its draft contact lens rule and instead impose new paperwork requirements on patients and doctors that are unnecessarily burdensome. The Committee directs the FTC to prioritize patient safety and consider enforcement mechanisms under its existing authority or revisions to the draft rule that address sales of excessive quantities of lenses, illegal substitutions, and communication challenges associated with prescription verification, including robo-calls. The Committee further directs the FTC to continue to confer and consult with other Federal agencies, including the Food and Drug Administration, to optimize its enforcement and consumer education activities.*

*There are many voices purportedly paying consultants to voice unfounded claims about why you should continue with the proposed rule. I urge you to listen to the nation's eye doctors and other public health experts in recognizing contact lenses as a medical device and by joining with the Food and Drug Administration (FDA) and the Centers for Disease Control (CDC) in making quality care and patient health and safety a priority in Washington, DC.*

NOTE: I, Dr. Rajan Arora, have had 3 incidents THIS week alone in which 1 patient's eyes have changed shape so significantly that I had to fit her into specialty lenses, which now will cost her even more money, to correct her vision because Hubble contacts just sold her lenses that were inappropriate for her. The second patient received her contact lenses online without a prescription, and thankfully,

immediately discarded them because she could tell they did not feel comfortable on her eyes. The third patient did "an online exam on 1800contacts.com" and of course, as I've heard repeatedly from patients, they just gave her the same contacts with the same prescription. 1800contacts did not take any history, did not address the patient's dry eye complaints, never checked her eye pressure, a vital sign for eye exams, and never checked the health of her eyes. That means no assessment was performed by 1800contacts for glaucoma, macular degeneration, dry eye, or any other health condition! That is outrageous!! That is not even close to an eye exam. 1800contact lenses basically copied and pasted the patient's old prescription, told them they were getting an eye exam, and sold them more contacts, without any regard, concern, or care for the patient's well-being or vision, and DID NOT SOLVE THE PATIENT's original problem with her current contacts.

The FTC CANNOT standby and NOT regulate online companies and their business practices. We optometrists are here to take care of our patient's eye care (vision and health). This lack of regulation is an outcry as people cannot be treated as mere business instruments without any concern for their well-being. Contacts are being sold by online vendors daily without any supervision or real eye exams. People are losing their vision, which is also increasing patient cost, due to these unscrupulous practices, and these online companies must be stopped by our government in charge of such regulations such as the FTC. Please listen to this plea as we health care providers actually want to take care of our patients, which is why patients come to us in the first place.

Thank you in advance for listening to the plea of our patients, the residents of the United States of America, who actually want good health care without extra red tape and more unnecessary paperwork!

Sincerely, 

  
Rajan Arora, O.D.