



January 30, 2017

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

Re: FTC's Notice of Proposed Rulemaking on the Contact Lens Rule (16 CFR Part 315, Project No. R511995)

To Whom It May Concern,

The Latino Coalition (TLC), a national advocacy organization representing Hispanic businesses and consumers, strongly endorses the FTC's Notice of Proposed Rulemaking on the Contact Lens Rule (16 CFR Part 315, Project No. R511995), and praises the FTC's commitment to improving choice for contact lens consumers and competition in the marketplace.

The FTC clearly understands that more needs to be done to make sure consumers know their rights and get copies of their own prescriptions after their eye exam and we strongly support their proposed amendment to the Contact Lens Rule. Thanks to the 2004 Fairness to Contact Lens Consumers Act (FCLCA), the price of contact lenses has come down and convenience for consumers has gone up. The fact that buyers can get their contact lenses in the mail, at a local drugstore or box store is critical when time is premium, especially for the small business owners and employers we represent

Failing to educate consumers about their right to take their prescription with them after they leave an eye exam means that consumers are being denied choice in the marketplace and the chance to shop around for the best price and most convenient timesaving service. Requiring optometrists to secure a written acknowledgment from patients that they have received a copy of their prescription will go a long way towards educating consumers and ensuring competition.

The Latino Coalition also applauds the FTC for rejecting attempts by the American Optometric Association and others to add burdensome new requirements to the Contact Lens rule designed to create barriers to entry to the contact lens market and slow down the growth of alternate sellers like on-line services and alternative retailers.



TLC prizes innovation and free markets and stand behind the FTC in their careful review of the law, which found that there is no empirical evidence and no scientific basis behind the claims that buying your contacts anywhere other than from the doctor who wrote your prescription will hurt your long-term eye health. It is time for the contact lens industry to stop using these false health claims to try and slow down their competitors and start focusing their energies on embracing innovation. Technology is changing the way the contact lens market works. People like the convenience of shopping online, comparing prices and getting products faster. We should not be asking the government to interfere in the marketplace to protect the interests of just one segment of the industry.

We urge the Federal Trade Commission to move forward and adopt their revised Contact Lens Rule as proposed as soon as possible.

Sincerely,

Allen Gutierrez
National Executive Director