



March 30, 2018

RE: FTC 16 CFR Part 315 Public Workshop Examining Contact Lens Marketplace and Analyzing Proposed Changes to the Contact Lens Rule

Dear Federal Trade Commission,

As a leading online retailer to millions of Americans looking for the best prices on high quality contacts, Lens.com is grateful to the Federal Trade Commission (FTC) and in particular, the dedicated FTC staff, on the hard work that went into creating the new Contact Lens Rule and respectfully submits this letter in strong support of its full implementation as initially drafted.

Tens of millions of Americans who wear contact lenses will benefit from the rule the Federal Trade Commission proposed. Optometrists will continue to be required by law as outlined in the Fairness to Contact Lens Consumers Act (FCLCA) to hand patients a copy of their prescription so those patients can decide for themselves where to purchase their lenses.

To better strengthen the rights of consumers, the Commission has proposed optometrists now obtain a patient's signature acknowledging their optometrist actually provided the prescription. This is because many optometrists do not provide patients with prescriptions despite being required to by law. We know the reason for this is because optometry offices actually make the majority of their revenue from selling contact lenses and glasses, not providing eye care services.

Lens.com strongly supports this proposed action by the Commission.

We believe this is a significant change and a real win for consumers. Back in 2003, Congress passed the FCLCA, which required optometrists to hand patients their contact lens prescription, so that patients could comparison shop for a better price. The law created a thriving, robust marketplace in which new market entrants and vigorous competition developed. This has driven prices down for consumers and led to new innovations in the market. However today, over a decade after the FCLCA passed into law, more than half of Lens.com customers report that optometrists still do not provide prescriptions as required by law. The Federal Trade Commission has been working on this rule for nearly two years, looking into the behavior of optometrists. What has been discovered is what those of us in the industry have known for years: many optometrists simply do not provide their patients with prescriptions as required by law.

Lens.com is grateful to the Commission for the hard work and investigation put into these findings.

Similarly, we strongly endorse the Commission's findings with regards to the rejection of health claims made by the AOA and the Commission's decisions to reject efforts to weaken the strong pro-consumer portions of the existing rule suggested by lens manufacturers and the AOA, specifically those concerning prescription verification.

The FTC has put a tremendous amount of work and consideration into the promulgation of this rule. Lens.com is grateful, and our millions of customers will benefit as a result. The nation's 40-plus million contact lens wearers owe the Commission and staff a great debt. Please move with all haste to enact the rule as drafted.

Sincerely,

A handwritten signature in cursive script that reads "Cary Samourkachian".

Cary Samourkachian
Lens.com, Inc.
Founder & CEO