

1 to discuss amendments to the FTC's Contact Lens Rule ("Rule") proposed in the May 2019 Supplemental Notice of Proposed Rulemaking ("SNPRM").

1-800 stated that it supports most of the proposals in the SNPRM. Specifically, 1-800

However, 1-800 encouraged
Specifically, 1-800 noted that although

years old, there are still issues with prescription release. 1-800 asserted that various consumer surveys indicated that approximately 60% of consumers did not automatically receive their prescription from the physician, and 30% never got their prescription at all. Although the Commission's SNPRM proposes to modify the signed acknowledgment proposal to allow for more flexible prescription delivery, 1-800 urged the Commission to reconsider

of their right to receive a copy of their prescription is a low cost and efficient method to inform consumers. Additionally, 1-800 argued that the notice language encourages prescribers to release prescriptions and dispensing contacts.

¹ In attendance on behalf of 800 CONTACTS were John Graham, Roy Montclair, Kellen Fowler, Allison Fleming, Lisa Kimmel, and Megan Wolf. Attendance from the FTC were

Exam could allow a patient to change contact lens brands under certain conditions, such as to switch from monthlies to dailies. According to 1-800, the Express Exam may provide a patient with multiple prescriptions to allow a patient to try different lenses (including 1-800's own branded daily disposable lens), but the patient will always receive a prescription for the brand the consumer was previously wearing. However, 1-800 noted that it does not send out trial lenses before a patient obtains a prescription.