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October 6, 2020

The Honorable Joseph Simons
Chairman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairman Simons,

Our company is concerned with the finalization of changes to the Contact Lens Rule. The updated regulations provide an option whereby physicians can use electronic health records (EHR) and patient portals to support the provision of contact lens prescriptions. The Commission also requires that physicians retain evidence that the prescription was sent, received, or made accessible, downloadable and printable. Further, the Commission requires that physicians obtain “verifiable affirmative consent” to provide the prescription electronically.

In EHR systems, current supports exist to assist physicians with compliance, including systems offered by our company. However, we would request additional time to further update our systems to best support doctors, as well as allow our firm to work with our customers to streamline the implementation process for them, and their patients.

We respectfully request that the Commission delay implementation to provide additional time to allow for EHR companies to make system updates to best serve physicians and their patients.

Sincerely,



Stan Tims
SVP Business Operations