



AMERICAN OPTOMETRIC ASSOCIATION

March 31, 2017

Maureen K. Ohlhausen
Acting Chairwoman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairwoman Ohlhausen,

The American Optometric Association (AOA) represents 33,000 doctors of optometry and optometry students. The AOA is the voice of the nation's family eye doctors and a leading authority on eye health, vision care, and patient safety issues. Doctors of optometry serve patients in nearly 6,500 communities across the country, and in 3,500 of those communities are the only eye doctors. The AOA urges the Commission to investigate Hubble Contacts and the company's potential violations of the Fairness to Contact Lens Consumers Act and the Contact Lens Rule (16 CFR Part 315).

AOA has received reports that Hubble Contacts is not appropriately verifying contact lens orders in accordance with 15 USC 7603(a). Further, that AOA has reports from physicians that Hubble Contacts has sold and is selling contact lenses that have not been prescribed by doctors as is required by 15 USC 7603(d). The AOA has also received reports that the company has sold contact lenses based on expired prescriptions, again, in possible violation of 15 USC 7603(d). Of greatest concern, Hubble Contacts is marketing its lenses directly to consumers and is essentially claiming that their lenses are equivalent to all other daily lenses manufactured by other companies. On their website, the company cites research which they note has found, "no significant differences between the comfort and visual sharpness of our contacts and the most popular brands in the U.S." Thus far, the AOA has been unable to obtain a complete copy of this study for review. Given the significance of this claim, the AOA believes that FTC should obtain and confirm the complete accuracy of this statement. The AOA would greatly appreciate the FTC's assistance in obtaining any additional information from the study that would be useful to patients to ensure that they are being provided with complete and accurate information regarding the research the company has cited.

We urge the FTC to investigate Hubble Contacts practices and ensure that the company is providing complete and accurate information to consumers and is complying with the legal and regulatory protections for contact lens patients. If you have additional questions or need more information, please contact Kara Webb, Associate Director of Coding and Regulatory Policy at kcwebb@aoa.org or 703-837-1018.

Sincerely,

A handwritten signature in cursive script that reads "Andrea P. Thau, OD".

Andrea Thau, OD
President, American Optometric Association