

June 8, 2018

The Honorable Joseph Simons
Chairman
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580

Dear Chairman Simons:

Congratulations on your recent appointment to the chairmanship of the Federal Trade Commission (FTC). Few positions in government have a more direct role in easing the burdens that can be imposed on the lives of everyday Americans than yours.

[Americans for Vision Care Innovation](#) and [Coalition for Contact Lens Consumer Choice](#) are two bipartisan coalitions made up of consumer organizations, free market groups, online sellers and others who advocate on behalf of the more than 40 million contact lens wearers benefitting from the competition and choice guaranteed to them under the Fairness to Contact Lens Consumers Act (FCLCA, 15 U.S.C. §§ 7601-7610). And those benefits have been tremendous: some 15 years since FCLCA's passage and the promulgation of the FTC's first Contact Lens Rule, consumers have enjoyed lower prices, innovative services, and a robust marketplace responsive to their needs.

The FCLCA provides that the Commission conduct a review and issue a new Contact Lens Rule every ten years to ensure consumers are being optimally served by the underlying intention of the law. Your predecessors initiated that process, and have drafted an outstanding, pro-consumer Rule that has been ready for final issuance for some time. Commission staff should be commended for the remarkable diligence they have put into considering the views of all stakeholders during this process. We urge you to vote to release the Rule as soon as possible, as originally drafted by FTC staff.

Additionally, our coalition members as well as organizations who participate in coalition activities would greatly appreciate the opportunity to visit you and your fellow Commissioners once you begin taking meetings related to policy issues. Our coalitions strongly support safe, innovative new online technology solutions that are creating easier, less expensive ways for consumers to renew their contact lens and eyeglass prescriptions from the comfort of their own home or office. These solutions increase competition and choice while reducing consumer burdens – especially for those in remote and rural areas who need to travel longer distances to visit an optometrist. Such developments likewise benefit taxpayers, who help to underwrite insurance plans for government employees and who seek cost-effective service-delivery models that other health care programs can emulate. We are eager to discuss these technologies with you in person, as well as ill-conceived efforts underway to block consumer access to them.

Finally, we hope you will consider our members as resources for you in your future deliberations. The individual organizations comprising our coalitions



have, for example, conducted polling, analyzed health research, examined fiscal policy aspects, and engaged in community outreach, all of which can prove useful to you.

Again, congratulations on your appointment as FTC Chairman. The members of [Americans for Vision Care Innovation](#), [Coalition for Contact Lens Consumer Choice](#), and other organizations who engage in coalition activities would be honored to work with you and your fellow Commissioners as you begin this remarkable opportunity to serve our nation's consumers.

Sincerely,

Pete Sepp, President
National Taxpayers Union

Grover Norquist, President
Americans for Tax Reform

Andrew F. Quinlan, President
Center for Freedom and Prosperity

Chuck Muth, President
Citizen Outreach

Ken McEldowney, Executive Director
Consumer Action

Andrew Langer, President
Institute for Liberty

Sindy Benavides, Chief Operating Officer
League of United Latin American Citizens

Seton Motley, President
Less Government

Lindsay Lewis, Executive Director
Progressive Policy Institute

David Williams, President
Taxpayer Protection Alliance

cc: Commissioners Ohlhausen, Phillips, Slaughter, and Chopra