

From: M Mccown
Sent: Friday, April 02, 2004 6:23 PM
To: CONTACTLENSRULE
Subject: Contact Lens Rule, Project No. R411002.

To Whom It May Concern:

As the rule-making process winds down, I would request that the FTC would clarify that multiple requests for contact lens prescription verification would not be allowed without the contact lens supplier confirming the prescriber's information with the patient who is ordering the lens. This would serve three purposes. First, it would confirm that the contact lens supplier has the correct information and is not faxing the request to another prescriber or fax number in error. If this is occurring, the contact lens supplier might assume that there has been no response, and this could result in incorrect or expired prescriptions being filled. Second, it would eliminate the difficulty that our office staff has already encountered with these multiple requests. After receiving one request for verification of contact lens prescription and faxing it back noting that the patient's prescription had expired, another request was received. This led to lost productivity for our business while our staff member attempted to confirm that the request was a duplicate and not for another family member. And third, it would also eliminate the suspicion that the multiple requests are an attempt "spam" the prescriber and thus have at least one request that does not yield a response. This would allow the contact lens supplier to claim and document that a request was made and not responded to, and again might result in the filling of expired or incorrect prescriptions.

To sum up, I am requesting that the contact lens supplier not be allowed to make multiple requests for contact lens verification without confirming the information with the patient who ordered the lenses.

Sincerely,

Dr. Michael S. McCown
Silverdale Eyecare Center

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