

**Senate Subcommittee on Antitrust, Competition Policy and Antitrust  
"Pricing Policies and Competition in the Contact Lens Industry:  
Is What You See What You Get?"**

**Questions for the Record: Senator Amy Klobuchar**

**Responses Submitted by Dr. David A. Cockrell, President of the American Optometric Association**

**August 20, 2014**

1. Do you think an increase in the price of contact lenses would result in patients using contact lenses beyond their recommended duration and risking potential harm to their eye health?

I'm not aware of research that would support such a conclusion. My own experience is that there are typically a number of factors involved when a person disregards the recommendations for proper use of contact lenses. As a practitioner, I am in favor of innovation in contact lens features and quality, which helps all patients. To the extent a manufacturer's pricing policy supports innovation, I think that is a good thing. Also, it was my understanding that the testimony at the July 30 hearing was not conclusive on the issue of whether UPPs would tend to raise product prices overall. I recall that the testimony of the Johnson & Johnson representative indicated that most patients would pay lower prices under the UPP. In any case, if concerns were raised about compliance with usage recommendations arising from cost or individual financial considerations, I could explore other options with the patient, including spectacles which can be a less expensive but very effective choice.

The bottom line is that any failure to comply with usage recommendations is dangerous and risks potential harm to the patient's eyes. Patients who push the boundaries of lens wear and safety are the patients who most need an eye doctor to educate and counsel them. Having a good relationship and trust with the doctor is key. Part of the role of the eye doctor is to instruct patients about the safety hazards of extending the lenses beyond their best timeframe and coach them on the best ways to care for the lens and their vision. Risks such as corneal debris, protein buildup, lens edge breakdown and other lens quality issues are tied to poor patient maintenance practices and can eventually lead to their inability to wear any lens, or worse, lead to inflammation, infection, corneal trauma and sometimes vision loss. Often, patients who fail to follow recommendation related to duration of use also push the boundaries of solution use, lens sterilization, and hours of wear per day, week or month. These safety and hygienic discussions are routinely initiated by the eye doctor and they are important to the patient's general visual health. Educating patients on lens use and care – as is done face to face in my office and the offices of my colleagues across the country every day-- is just as important as the right fit.

2. At the hearing, you mentioned that your office orders from 10 to 15 different manufacturers. What percentage of the contacts your office orders come from the four largest manufacturers –Johnson & Johnson, Alcon, CooperVision, and Bausch & Lomb?

As stated during the hearing, lens choice is based on the parameters that best meet the individual patient's needs, including health and eye safety, visual acuity with the lens and compliance capabilities. In my practice, the total for the four manufacturers is between 60-70%. Johnson & Johnson is the largest, followed by CooperVision, Alcon and Bausch and Lomb.

Just to clarify, the 10 to 15 number was for any given month. There are approximately ninety different contact lens manufacturers selling hundreds of different lenses, and over the course of a year my office orders from more than 15 different manufacturers. A lot of the smaller manufacturers sell specialty lenses which are not commonly used, but which are essential for the patients who require them.

Thank you.