

the Senate District of Columbia Committee examine the adequacy of present District laws on . . . "(a) widespread fixed-price advertising for regular glasses and contact lenses; (b) sale of over-the-counter, nonprescription glasses; (c) possible need for greater authority to the District Commissioners for regulation of 'the corporate practice of optometry'." In relation to these recommendations by the Senate Special Committee on Aging, I refer you to a clipping from the Washington Evening Star of February 1965. This is attachment 1-A.

For several years many of us optometrists here in the District saved local newspaper ads offering specials, discount prices and other "bargains" on eyeglasses and examinations in the hope that the Board of Optometry could do something to prohibit them. We finally stopped collecting those ads after being told repeatedly that the present law in no way regulates such practices. At this point I refer you to our attached document No. 3, which illustrates the type of advertising to which I refer.

The advertisements in the classified telephone directory "Yellow Pages" are equally unbecoming health care services, and I ask that you note the content of ads shown in our attachment No. 4. Such statements as "Moderate Prices—We keep our costs low by volume—Eyes Examined—Prescriptions Filled—Lenses Duplicated—Contact Lenses—Children's Eyes Examined—two-hour Service", or "Eyes Examined—Glasses Fitted—Budget Terms Available—Discounts to Government Employees, Union Members, Diplomatic and Military Personnel and Families", confuse and frequently mislead the public.

The companies which place such quarter-page directory ads, the largest size sold, sell eyeglasses. Their term "Eyes Examined" pertains only vaguely to the term "Vision Care". The so-called examinations they make are called "quickies" and rarely take more than 15 minutes, sometimes as few as five minutes; a complete professional vision examination requires at least 45 minutes.

As to the glasses these "discount" operations sell, there is a strong chance that something will be wrong with them. The prescription may not be filled accurately. For example, in a pair of \$7.25 glasses, while one lens may meet prescription specifications, the other lens may be so inaccurate that it fails to give the needed correction. Additionally, the lenses themselves frequently are other than first quality. Cut-rate operations often rely on inferior foreign-made lenses or on rejects and second or third quality American-made lenses which can have various defects which may seriously affect light transmission.

Anyone operating as an eyeglass merchant simply cannot devote more than minimal time to fitting the eyeglasses. As stated in one of the "Yellow Pages" ads, "We keep our costs low by volume." And volume depends on heavy traffic and fast turnover.

I would like to call your attention at this time to attachment No. 5, which will give you some idea of the quality of materials frequently purchased by eyeglass merchandisers. You will note that some of these materials are available to the eyeglass peddler at 30 cents a pair, when purchased in lots of 100 pairs. The suppliers of these ophthalmic materials are so sure these factory seconds are defective, they say "Guaranteed usable or replaced"—which obviously means that if the particular pair fitted to a patient's face is so unsatisfactory that the