dresses, are frequently purchased primarily on the basis of cosmetic considerations.

While the manufacture and grinding of lenses and glasses requires considerable skill and attention and an inferior product may directly affect the health of the eye, price advertising of these products should be prohibited only if it is clearly shown that such advertising necessarily results in lower quality standards.

The price competition which such advertising engenders in the sale of optical products allows the public to benefit from lower prices, which in many instances encourage or enable persons to obtain visual aids that they need but that they would otherwise be unable or unwilling to purchase. Moreover, experience in this country demonstrates that healthy competition promotes innovation and frequently results in better products being made available to the public.

The record of the present hearings fails to establish that healthy price competition fostered by advertising is incompatible with the maintenance of acceptable quality standards in connection with the sale of optical products. If the use of inferior materials or inferior workmanship is or becomes prevalent, we submit that proper protection of the public requires the establishment of minimum quality standards and/or required checks of the finished lenses and glasses by a qualified optometrist or ophthalmologist rather than the stifling of competition through a blanket prohibition against price advertising.

In conclusion, we submit that prohibitions against legitimate advertising are an extremely inappropriate method of regulation. They are a poor and ineffective substitute for more direct regulatory provisions which go to the core of whatever abuses or improper practices may exist. Frequently the only effect of such prohibitions is the elimination of competition contrary to the public interest.

For the above reasons, the undersigned members of the Washington Publishers Association respectfully urge that if the Committee decides to act favorably with respect to H.R. 12937 that it first delete therefrom the restrictions upon advertising contained in Section 7(a) (8) and Section 8(a) (5).

Respectfully yours,

WASHINGTON PUBLISHERS ASSOCIATION,
By HENRY C. GRONKIEWICZ,
*Executive Director.*
THE EVENING STAR NEWSPAPER CO.,
By JOHN H. KAUFFMANN,
*Vice President and Business Manager.*
THE WASHINGTON DAILY NEWS,
By RAY F. MACK,
*Business Manager.*
THE WASHINGTON POST CO.
By JAMES J. DALY,
*Vice President and General Manager.*

April 2, 1966.

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STATEMENT OF THE NATIONAL NEWSPAPER ASSOCIATION ON H.R. 1283

Mr. Chairman, the following statement is submitted in behalf of the 6,600 weekly and community daily newspapers making up the membership of the National Newspaper Association, and of their state newspaper associations affiliated with NNA.

This association supports standards of professional training, examination and licensing to insure that the practice of optometry in the District of Columbia is conducted on the highest possible level. Insofar as H.R. 1283 strengthens existing statutes in this area, we have no objection to this legislation.

In the area of advertising, however, the District of Columbia code already prohibits any form of fraudulent advertising and makes ample provision of enforcement of this prohibition. (Section 22–1411, Fraudulent Advertising; and Section 22–1413, Penalty, quoted below).

H.R. 1283 makes no further distinction between fraudulent or misleading advertising, and truthful advertising of optometric services. Instead it would prohibit all advertising. This, our association submits, would:

1. Deprive the public of the convenience resulting from advertising—notice of optometrists' office location, hours of service, credit arrangements available.
2. Lose the "reminder" value of advertising, which by its very presence in advertising media, serves to encourage those needing eye care services to take advantage of optometric services available.