
The State of Wisconsin

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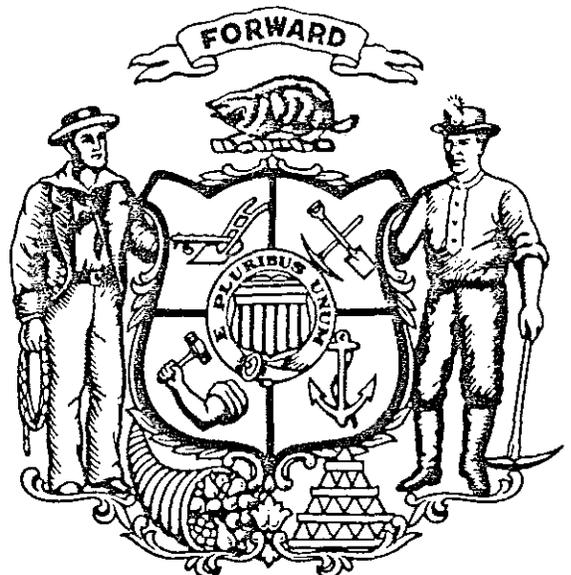
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REGULATION OF EYEGGLASS ADVERTISING

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REGULATION OF EYEGLASS PRICE ADVERTISING

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION.....	1
II. HISTORY OF SECTIONS 449.08 AND 449.10.....	1
Laws Enacted.....	1
Legislation Which Failed.....	2
Wisconsin Supreme Court Decision and Early Attorneys General's Opinions.....	3
III. UNITED STATES SUPREME COURT DECISIONS.....	3
IV. CURRENT STATUS IN WISCONSIN.....	4
Current Statutes and Administrative Rules.....	4
Attorney General La Follette's Opinion.....	5
1977 Proposed Legislation.....	7
V. STATUS IN OTHER STATES.....	8
VI. REPORTS ON ECONOMIC IMPACT OF PRICE ADVERTISING.....	10
VII. SOURCES.....	12

REGULATION OF EYEGLASS PRICE ADVERTISING

I. INTRODUCTION

The Wisconsin Statutes prohibit advertising the price of eyeglasses. The United States Supreme Court, however, has recently declared that a ban on advertising the price of prescription drugs by Virginia is unconstitutional. In light of its decision in the Virginia case the Court has remanded to a lower court for reconsideration a case involving a California statute, similar to the Wisconsin law, prohibiting price advertising of eyeglasses. These decisions may affect the statutes of all states which prohibit price advertisement of certain products. Based on the Supreme Court's decision, the Attorney General of Wisconsin has issued an opinion questioning the constitutionality of the price advertising ban in this state.

The Federal Trade Commission is also interested in the matter and has recently completed a study on the subject of price advertisement. It is expected to issue new regulations which would have an effect on existing state statutes.

In the wake of these developments, the 1977 Wisconsin Legislature is considering two bills which would eliminate the ban on price advertising.

This report is a summary of these developments and of the current status of the law in Wisconsin.

II. HISTORY OF SECTIONS 449.08 AND 449.10LAWS ENACTED

Sections 449.08 and 449.10 are the current sections of the Wisconsin Statutes which regulate eyeglass advertising. Their origin lies in laws enacted in 1931.

Chapter 118, Laws of 1931, created Section 153.06 (4), Wisconsin Statutes, which placed price advertising of eyeglasses, conduct likely to deceive or defraud the public, advertising using misleading statements, and other advertising and associated activities under the heading of "Unprofessional conduct" and made them, therefore, grounds for revocation of an optometry license. The bill was introduced at the request of the Wisconsin Board of Examiners in Optometry, which was given specific authority to enforce the provisions of Chapter 153 of the statutes.

Chapter 273, Laws of 1943, repealed and recreated Chapter 153

of the statutes. Section 153.06 (4) was renumbered and amended to be Section 153.08. The new section retained under the definition of "Unprofessional conduct" the same provisions with the exception of the ban on price advertising of eyeglasses, which was placed in a new Section 153.10. Section 153.10 banned advertising the price of eyeglasses, advertising which would tend to mislead or deceive the public, and advertising claims of professional superiority, and made it unlawful to provide any optometric service pursuant to such advertising. For a number of years Wisconsin and other states, despite the provisions of Section 153.06 (4), had been experiencing a problem with fraudulent or bait advertising. In July 1941 the Wisconsin Department of Agriculture served complaints on 16 individuals and 29 companies for unfair trade practices. The department charged them with advertising eyeglasses for \$3.45 and using the price as an inducement to persons who ultimately paid from \$6 to \$40 for eyeglasses. The enactment of Chapter 273 appears to have been a reaction by the Wisconsin Legislature to this situation.

Chapter 254, Laws of 1961, repealed and recreated the unprofessional conduct section (153.08). To the previous provisions, it added (2) (a) to (f), which again included, under the category of unprofessional conduct, advertising claims of professional superiority, use of certain signs, and advertising price or credit terms.

Chapter 336, Laws of 1969, renumbered Sections 153.08 and 153.10 to be Sections 449.08 and 449.10, respectively. No further changes have been enacted affecting these sections.

LEGISLATION WHICH FAILED

From the 1943 to the 1975 sessions of the legislature six bills to amend either Section 449.08 or 449.10 have been introduced, but have failed.

1945 Assembly Bill 195, introduced by Representative Ludvigsen but later returned to the author, would have repealed the prohibition on advertising claims of professional superiority in Section 153.08.

1955 Senate Bill 139, introduced by Senator Panzer and others, would have included under the definition of unprofessional conduct in Section 153.08 prohibited advertising as defined in Section 153.10 and in the rules of the Optometry Board. The bill also would have enlarged the area covered by the advertising ban of Section 153.10 by adding to it "large, display, glaring, illuminating or flickering light signs." Assembly Amendment 2 and Assembly Substitute Amendment 1 by Representative Genzmer would have allowed advertising if "a complete list of all price and credit terms" were published in the advertisement. The bill passed both the Assembly and the Senate without Representative Genzmer's amendments. Governor Kohler vetoed the bill, and the Senate did not override the veto.

1959 Assembly Bill 243, introduced by Representative Schuele at the request of Mr. Robert Brady, would have lifted the advertising ban for "any person, firm or corporation, who fills prescriptions for lenses or glasses written by licensed optometrists or physicians." The bill was indefinitely postponed.

1973 Assembly Bill 1363, introduced by Representative Berger, would have repealed all of Section 449.08 (2) except 449.08 (2) (d) requiring the individual optometrist to practice only under the name in which the license is issued. The bill would also have amended Section 449.10 to permit advertising as long as it was not misleading or prohibited under Section 449.08 (2) (d).

1975 Senate Bill 377, introduced by Senator Flynn and others, would have amended Section 449.10 to allow advertising of the price or credit terms on corrective lenses so long as it was not misleading. The bill died in committee.

1975 Assembly Bill 848, introduced by Representatives Norquist and Czerwinski and cosponsored by Senator Flynn, was identical to 1975 Senate Bill 377. It failed to pass.

WISCONSIN SUPREME COURT DECISION AND EARLY ATTORNEYS GENERAL'S OPINIONS

In February 1945 the Wisconsin Supreme Court upheld the constitutionality of the provisions of the Wisconsin Statutes prohibiting advertising by optometrists. The case (Ritholz v. Johnson, 246 W 442, 17 NW (2d) 590) came before the court to test whether the statute was a proper exercise of the state's police powers in the interest of public health and welfare. The court found that the state was properly exercising its authority in prohibiting the advertisement of the price of eyeglasses.

Prior to 1976, Wisconsin's Attorneys General issued three opinions clarifying the statutory ban on price advertising: 21 OAG 1111 (1932), 48 OAG 223 (1959), and 60 OAG 335 (1971). These opinions did not question the constitutionality of the price advertising ban in Sections 449.08 and 449.10, Wisconsin Statutes.

III. UNITED STATES COURT DECISIONS

On January 6, 1976 a panel of three federal judges ruled California's statute banning price advertising of eyeglasses unconstitutional. The case of Terminal-Hudson Electronics v. Department of Consumer Affairs, 407 F. Supp. 1075 (1976), was brought by consumers and by distributors of corrective lenses to challenge the California statute which prohibits price advertising for corrective lenses. The three-judge panel held that the state statute violates the first amendment rights of the consumer to receive information concerning the price of and places to purchase corrective lenses. The case was appealed to the United States Supreme Court. The Court vacated the judgment and sent the case back to the panel for consideration in light of the Supreme Court's decision in Virginia State Board of Pharmacy v. Virginia Citizens Consumer Council, Inc., 425 U.S. 748, 96 S. Ct. 1817 (1976). The State of Virginia prohibited advertising the price of prescription drugs by licensed pharmacists. In the Virginia case, the United States Supreme Court ruled that the statute was a violation of the first amendment right to freedom of speech. The Court held that the first amendment

protections treat free speech as "communication", which means that the person listening has a right to receive information independent of the right of the speaker to give the information. This does not mean that the states do not have a valid interest in regulating commercial speech (advertising) to prevent false or misleading speech. Thus, states may not strictly prohibit price advertising for products sold by prescription but may regulate it in a manner to prevent deceptive advertising.

IV. CURRENT STATUS IN WISCONSIN

CURRENT STATUTE AND ADMINISTRATIVE RULES

Sections 449.08 and 449.10, Wisconsin Statutes, currently read as follows:

"449.08 UNPROFESSIONAL CONDUCT. (1) Unprofessional conduct includes without limitation because of enumeration:

(a) Any conduct of a character likely to deceive or defraud the public;

(b) Loaning of an optometric license or certificate to anyone;

(c) The employment of 'cappers' or 'steerers' to obtain optometric patronage, or the public solicitation of optometric patronage, or the public solicitation of optometric patronage by the holder of the certificate;

(d) Splitting or dividing any fee for optometric service with any person, except an associate licensed optometrist; or

(e) Engaging in conduct unbecoming a person licensed to practice.

(2) Unprofessional advertising includes without limitation because of enumeration:

(a) Advertising professional superiority or the performance of professional services in a superior manner;

(b) Advertising definite or indefinite prices or credit terms, directly or indirectly, or by inference;

(c) Advertising by means of neon or flickering signs, or containing as a part thereof the representation of an eye or eyeglasses or any part thereof or contact lenses or any part of the human head;

(d) No optometrist shall display any sign or advertise by the use of any name other than the name under which he is licensed to practice optometry in this state. This shall not preclude the use of a predecessor optometrist's name by his successor for a period of 6 months after taking over the predecessor's practice.

(e) The use of any office sign larger than 600 square inches in size over-all or containing letters over 6 inches in size. Such office signs may contain only the name of the duly licensed optometrists practicing therein, their titles and office hours. No optometrist or association of optometrists shall use more than 3 signs at any one location. If more than one sign is used no single sign shall exceed 300 square inches;

(f) Any printed advertisement larger than 20 square inches in size. Such printed advertisement may contain only the names of the

duly licensed optometrists, their titles, office hours, location or place of practice, telephone numbers, and any one specialty.

449.10 PROHIBITED ADVERTISING. It shall be unlawful for any person to advertise either directly or indirectly by any means whatsoever any definite or indefinite price or credit terms on lenses, frames, complete glasses or any optometric services; to advertise in any manner that will tend to mislead or deceive the public; to solicit optometric patronage by advertising that he or some other person or group of persons possess superior qualifications or are best trained to perform the service; or to render any optometric service pursuant to such advertising."

Sections of the Wisconsin Administrative Code which deal with advertising by optometrists currently read as follows:

"OPT 7.05 UNPROFESSIONAL PRACTICES. The following practices, among others, constitute unprofessional conduct:

(1) The use of bold face type or any other means of attempting to attract special attention to himself in any telephone or other public directory, newspaper, or any other communication media including newspapers, magazines, television, radio broadcasts, or any other advertising matter distributed to the public.

(2) The use of stationery and professional cards containing other than the names, titles, office hours, location and telephone number. This shall not prohibit identification of a service corporation or entity by such words as Limited, S.C., or Inc.

(3) The use by an optometrist, on his stationery, card or printed matter, of a multiple title. (e.g., jeweler-optometrist, optometrist-hearing aid salesman, etc.) The illustrations are not meant to be exclusive.

(4) The use of the title optometrist or other reference to his profession in the advertising of hearing aids or other articles.

(5) The use of any advertising, by whatever media, containing other than the name of the duly licensed optometrist, his title, office hours, location or place of practice, telephone number and any one specialty. This shall not prohibit identification of a service corporation or entity by such words as Limited, S.C., or Inc.

(6) The use or representation of eyes, or glasses, or show cases or window displays, or ophthalmic equipment as advertising.

OPT 7.07 CAPPING AND STEERING. It shall be unprofessional conduct for an optometrist to engage in the practice of 'capping and steering' defined as follows:

(1) The employment, either directly or indirectly, of any person or persons known to be advertising or soliciting in a manner contrary to the laws of this state concerning the practice of optometry in order to obtain optometric patronage, or

(2) The public solicitation by any licensed optometrist for the sale of either optometric materials or optometric service."

ATTORNEY GENERAL LA FOLLETTE'S OPINION

Although three earlier opinions by Wisconsin Attorneys General had upheld the statutory ban on advertising the price of eyeglasses, the latest opinion, OAG 51-77 (1977) by Attorney General Bronson La

Follette, reversed them. The 1977 opinion declares:

"In my opinion the Virginia case voids four words in sec. 449.10, Stats., i.e., 'lenses, frames, complete glasses,' on the ground that price advertising of these items (prescription drugs in the Virginia case) is communication protected by the first amendment to the United States Constitution. These words can be severed from the section without making the section meaningless. Sec. 990.01 (11), Stats.; State ex rel. Milwaukee County v. Boos, 8 Wis.2d 215, 224, 99 N.W.2d 139 (1959).

"The holding in the Virginia case, that the state may not prohibit price advertising of prescription drugs by licensed pharmacists, is based on the first amendment right to freedom of speech. The Supreme Court stated that the protection of the first amendment extends to free speech as 'communication,' meaning, that the listener has a protectible right to receive information independent of the right of the speaker to give it. Further, 'commercial speech,' i.e., speech presented in the form of a paid advertisement, carried in a form that is sold for profit, or involving a solicitation to purchase or otherwise pay or contribute money, is protected at least to the extent that it conveys purely factual information of public interest.

"In more concrete terms, the interest of an advertiser in commercial advertisement, even though purely economic, is entitled to the protection of the first amendment, while the interest of a consumer in obtaining price information 'may be as keen, if not keener by far, than his interest in the day's most urgent political debate.' 96 S. Ct. at p. 1826.

'Generalizing, society also may have a strong interest in the free flow of commercial information. Even an individual advertisement though entirely 'commercial,' may be of general public interest. ...' (p. 1827)

The court did recognize that the state has a valid interest in maintaining standards of professionalism:

'... Virginia is free to require whatever professional standards it wishes of its pharmacists; it may subsidize them or protect them from competition in other ways. Cf. Parker v. Bown, 317 U.S. 341, 63 S.Ct. 307, 87 L.Ed. 315 (1943). But it may not do so by keeping the public in ignorance of the entirely lawful terms that competing pharmacists are offering. ...' (p. 1829.)

Also the state may have a valid interest in regulating commercial speech, for example, where it is false, deceptive, misleading or proposes illegal transaction. In this case, however, the court found that what was in issue was merely the right of free access to truthful information, and it held that the state may not 'completely suppress the dissemination of concededly truthful information about entirely lawful activity, fearful of that information's effect upon its disseminators and its recipients.' 96 S. Ct. at p. 1831.

"See also, Terminal-Hudson Electronics v. Dept. of Con. Aff., 407 F. Supp. 1075 (1976), in which an injunction was granted staying the enforcement of a California statutory ban on the advertise-

ment of eyeglass prices. On March 22, 1976, Mr. Justice Rehnquist stayed the enforcement of the preliminary injunction (Case No. A-760). On June 7, 1976, the court vacated the stay and remanded the case for consideration in light of the Virginia decision. See 96 S. Ct. 2619 (1976). To date, there has been no final decision on this case.

"In conclusion, in light of the Virginia decision, it is my opinion that sec. 449.10, Stats., to the extent it prohibits price advertising on lenses, frames and complete glasses, is in violation of the first amendment. Consequently, it is also my opinion that advertising by optometrists of prices of lenses, frames and complete glasses is not unprofessional conduct under sec. 449.08, Stats.

"Further, in light of the Virginia case, 60 Op. Att'y Gen. 335 (1971) and 48 Op. Att'y Gen. 223 (1959) are withdrawn."

A similar ruling was made in early 1977 by the Attorney General of New Jersey. In Formal Opinion 4-1977 he states that the New Jersey "statutory ban on the advertisement of the price of ophthalmic goods by ophthalmic dispensers and technicians is an unconstitutional infringement of the public's First Amendment right to the free flow of commercial information." This is in accord with the U.S. Supreme Court decision in the Virginia case.

1977 PROPOSED LEGISLATION

1977 Senate Bill 334, introduced by Senator Flynn and others, would repeal and recreate Section 449.10 of the statutes to allow advertising the price and credit terms of corrective lenses as long as it did not mislead or deceive the public. A hearing was held on June 16, 1977 by the Committee on Judiciary and Consumer Affairs.

1977 Assembly Bill 765, introduced by Representatives Norquist and McClain and cosponsored by Senator Flynn, would repeal and recreate Section 449.10 to allow price advertising in a manner identical to that in 1977 Senate Bill 334. A hearing was held by the Committee on Commerce and Consumer Affairs on July 21, 1977. On September 6, 1977 Representative Norquist introduced Assembly Substitute Amendment 1, which would repeal Section 449.08 (1) (c) and (2) (b), (d), (e) and (f), Wisconsin Statutes, and repeal and recreate Section 449.10 to prohibit the Optometry Board from issuing rules to prohibit advertising on products and nonvariable services "unless intended to regulate false or misleading advertising." The committee subsequently voted unanimously to adopt Assembly Substitute Amendment 1 and recommended it for adoption. The substitute was the same as the provisions in 1977 Assembly Bill 784.

1977 Assembly Bill 283, introduced by Representative Norquist and others, was identical to 1977 Senate Bill 334 except that it would have imposed a fine for the violation of advertising restrictions and would have suspended the convicted individual's right to advertise for two years. The bill was returned to the authors.

1977 Assembly Bill 784, introduced by the Legislative Council, would revise occupational licensing laws, including provisions to repeal Sections 449.08 (1) (c) and (2) (b), (d), (e) and (f) and 449.10 and recreate Section 449.10, to prohibit the Optometry Examining Board from prohibiting advertising unless it was "intended to regulate false or misleading advertising."

V. STATUS IN THE OTHER STATES

All 50 states have some form of law or regulation which restricts price advertising of eyeglasses. A Federal Trade Commission study, "Advertising of Ophthalmic Goods and Services," lists 36 states, including Wisconsin, that ban price advertising absolutely. Fourteen states do not have a complete ban on price advertising: Alabama, Arizona, Colorado, Georgia, Indiana, Iowa, Kansas, Maryland, Michigan, Minnesota, Missouri, Nebraska, Texas, and Utah. Advertising restrictions are placed on optometrists by state statutes, state regulations, and by state optometric association rules. These restrictions range from partial price advertising restrictions to a complete ban on all advertising, including the use of signs or window displays and restrictions on the use of telephone listings. The following table, taken from the FTC study, details restrictions placed on optometrists in the 50 states.

Table: COMPARATIVE STATE DATA

	OPTOMETRISTS										
	Price Advertising Prohibitions			Other Advertising Restraints				Business Practice Restraints			Opticians
	1	2	3	4	5	6	7	8	9	10	
ALA.	D		S	E	L	E	E	E			
ALAS.	D	X		R	R	R	R	R			L
ARIZ.			N	E	E	R	R		R		
ARK.	C			L	L	R	R	E	L		
CAL.	C			L			E		L	L	L
COLO.			S	E	L	E	L		L		
CONN.	D	X		R		R	R	L			E ¹
DEL.	U					R	R	L	L		
D.C.			S	E	E	E					
FLA.	C			L	L	R	R	R	L	L	L
GA.		X		R		R	R	R			E
HAW.	G			L	L	L	L	L			L
IDAHO	D	X				R	R		R	R	
ILL.	C			L	L	R					A
IND.	C			L	E	E		L			A
IOWA			S	E	E	E	E				
KAN.	D	X		R	R	R	R	R		R	
KY.	C			L	L	L	L		R	L	A
LA.	C			E	E	E					A
ME.	C			L	E	L	L	L		L	A
MD.			N	E	E	E					
MASS.		X		R	L	R	R	R	R		
MICH.	C			L	R	R					
MINN.	U			R	E	E		E	E		
MISS.	D	X		R			R	R		R	
MO.	G			E	R	E	E	E			
MONT.	C			E	E	E	R	L			
NEB.	U			L							E
NEV.	U			R	R	R	R	L			L
N.H.	G							R			
N.J.	G			L	L	L	L	L	L		L
N.M.	C			L							A
N.Y.	D	X		E	R	E	E	E			L
N.C.	G			L							L
N.D.	C			R	R	R		L			
OHIO	¹					E	E		R		
OKLA.	C			L		E	E	L	L		A
ORE.	U			E	L	E	E				A
PENN.	G					R	R		R	R	A
R.I.	C			R		R	R	L			A
S.C.	C			R	L	R	R	L		L	L
S.D.			S	R	L			R			
TENN.	G			L	L	L		L	L		L
TEX.	G ²					L	E	L			
UTAH	U ³										
VT.		X		R		R	R				
VA.	C			L	R	R	L	⁶			A
WASH.	C ⁴			E	L		E	E	E		L
W.V.	G ⁵					E	E	L	L		
WIS.	C				L	R					A
WYO.	C			L					L		A

KEY

1-Statutory price advertising prohibitions-Optometrists:

- U="unprofessional conduct" definition
- G=grounds for license suspension or revocation other than unprofessional conduct
- C=criminal penalties for "unlawful" price advertising
- D=defers power to state board or professional assn. to define "unprofessional conduct"

2-State board regulation price advertising prohibitions (X)

3-State optometric assn. price advertising prohibitions:

- S=state assn. codes of ethics or rules of practice
- N=national assn. (American Optometric Association) Code of Ethics deferred to by state assn.

4-All forms of media advertising prohibited except announcement of new practice or location

5-No advertising of discounts or premiums

6-Sign and window display limitations

7-Telephone directory listing limitations

8-Practice in mercantile establishment prohibited

9-Employment with unlicensed persons or firms prohibited

10-No more than one branch office

11-Opticians prohibited from price advertising by statute or regulation:

- L=licensing statutes or regulations for opticians contain ad bans
- A="All persons" designations in optometry statutes extend ban to opticians

E=state optician association codes of ethics prohibit price ads

- *L=prohibited by state law
- R=prohibited by regulation
- E=prohibited by professional assn. codes of ethics or rules of practice

¹ Price advertising banned by city ordinance in major cities, e.g. Cleveland, Cincinnati, and Dayton.
² Texas permits optometrists to advertise prices only if they own, operate or manage a dispensing opticianry, and advertise in the name of the opticianry and not in their professional capacity.
³ Price advertising prohibited unless accompanied by simultaneous disclosure of quality, grade, and special characteristics of the optical article.
⁴ Partial ban: only frames and mountings may be advertised - not lenses or professional services.
⁵ Advertising of completed eyeglasses prohibited unless prices broken down as to component parts.
⁶ Grandfather clause permits commercial or mercantile practice if such establishment was employing an optometrist on June 21, 1938.

VI. REPORTS ON THE ECONOMIC IMPACT OF PRICE ADVERTISING

Recent newspaper articles have pointed out that it is possible to have a prescription for eyeglasses filled in Texas for \$20 and to have the same prescription filled in California, which has a strict advertising ban, for \$30 or more. Similar price differences exist in regards to contact lenses. Dr. Lee Benham of Washington University, St. Louis, concluded in his study, "The Effect of Advertising on the Price of Eyeglasses," (Journal of Law and Economics, 1972) that persons who purchase their eyeglasses in states with prohibitions on price advertising of eyeglasses pay from 25% to 100% more than do those individuals who purchase glasses in the 14 states which permit advertising and thus allow the interplay of a free market.

Similar findings were also made by the staff of the Federal Trade Commission in their study, "Advertising of Ophthalmic Goods and Services." In September 1975, the Federal Trade Commission had directed its staff to conduct a study into the "adequacy of information disclosure, including price information, related to the sale of prescription eyeglasses." As noted in the FTC staff report, the industry argued that price advertising would cause a decrease in the quality of services and in the product provided. The report concluded, however, that the evidence did not support the claim, and that, even if it did, restrictive advertising was not the most effective way to protect the public from defective products. Instead, quality standards on the products should be more strictly enforced by the Federal Government, and the quality of service, by the 50 states.

The staff recommended that the FTC adopt a rule which would, in effect, void state laws which restrict price advertising of corrective lenses. It concluded that:

- "(1) Existing state laws rules and regulations, and associational codes restrict the amount of information available to the consumer concerning the cost and availability of prescription eyeglasses;
- (2) Information pertaining to the cost and availability of prescription eyeglasses is material information which would, if available, enable consumers to make purchase decisions in a more rational manner;
- (3) The inadequacy of information pertaining to the cost and availability of prescription eyeglasses prevents the operation of desirable competition in the prescription eyeglasses market, thus causing prices for prescription eyeglasses to be maintained at artificially high levels;
- (4) As a direct result of these artificially high prices for prescription eyeglasses, not only do consumers spend substantially more each year than they would spend if adequate information existed, but also low-income consumers and consumers living on fixed incomes may be prevented from purchasing a necessary commodity;

- (5) Unless consumers are provided with copies of their prescriptions for corrective lenses so as to enable them to purchase prescription eyeglasses from the seller or provider of their choice, they will be unable to make adequate use of the increased availability of information pertaining to the cost and availability of prescription eyeglasses; and
- (6) There are no adequate justifications or counter-vailing state interests to support the continued restriction of information pertaining to prescription eyeglasses."

The proposed rule would eliminate all restrictions placed on price advertising by both private and governmental rules and regulations and would allow the providers of ophthalmic services and products to advertise if they so choose. As of September 6, 1977 the Federal Trade Commission had still not adopted this proposed rule.

During the early months of 1977 the U.S. Senate Select Committee on Small Business's Subcommittee on Monopoly and Anticompetitive Activities held eight informational hearings on restrictive and anticompetitive practices in the eyeglasses industry. The hearings, conducted by Senator Gaylord Nelson, took testimony from the FTC, other federal agencies, practicing optometrists, and representatives of the manufacturers of eyeglasses and consumer groups. No bills are expected to be introduced as a result of these hearings.

VII. SOURCES

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