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Division of Dockets Management
Food and Drug Administration
5600 Fishers Lane, Rockville MD 20857

RE: Docket Number 2005P-0166/CP1

Dear Sir or Madam:

I am a Fellow and Past President of the College of Optometrists in Vision Development (COVD).

I am writing in strong support of the Petition filed by the International Myopia Prevention Association (IMPA) on May 2, 2005. I strongly urge the FDA to refer the Petition to the Ophthalmic Devices Panel, which should hold hearings to ascertain the correct course to follow in responding to this very important initiative by IMPA.

As stated in the Petition, there is ample data to support the request that parents be advised that wearing minus lenses full time to correct distance vision may cause an increase in myopia. It is well known that prescribing distance minus lenses to provide normal far vision increases the near focusing demand and the eye begins a new cycle of increased visual stress for near. This stress over a long period of time can cause the myopic adaptation that is so prevalent today.

Wearing plus lenses for prolonged computer and other near work may prevent myopia. I can tell you that there are many optometrists who have research and actual clinical data that they can present in support of the Petition.

Even taking into account any role that heredity plays in some people in predisposing their eyes to become myopic, prolonged close work appears to have a far greater degree of influence. This is the central proposition underlying the Petition. Based upon my many years of experience as a practicing optometrist, I firmly believe that the proposition is correct.

It is critically important that parents be given correct information when obtaining glasses or contact lenses for their children. Therefore, I hope and trust that the FDA will respond positively to the Petition by investigating this issue fully and taking appropriate action.

Sincerely,

Donald J. Janiuk, O.D., FCOVD