



Office of the Secretary

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

December 14, 2007

Marc Rotenberg, Esq.
EPIC Executive Director

Jeff Chester, Executive Director
Center for Digital Democracy

Dear Mr. Rotenberg and Mr. Chester:

I am in receipt of a copy of your letter to the Federal Trade Commission entitled "Complaint Requesting Recusal of the Federal Trade Commission Chairman From the Pending Review of the Proposed Google-DoubleClick Merger," dated December 12, 2007, as supplemented on December 13, 2007. Although your request states that it is filed pursuant to Rule 4.17 of the Commission Rules of Practice and Procedure, 16 C.F.R. § 4.17 (2007), Rule 4.17 does not apply, because your request does not arise from "any adjudicative or rulemaking proceeding."

Nonetheless, we understand that your letter asks the Chairman to recuse herself from the review of the transaction. Accordingly, we have treated your letter as a request for review pursuant to federal ethics laws and regulations regarding potential conflicts in Commission investigations under Part 2 of the Commission Rules, 16 C.F.R. Part 2. Pursuant to these Rules, the Designated Agency Ethics Official, Deputy General Counsel Christian S. White, has reviewed the matter, and the Chairman and Commissioners are issuing statements in response.

Sincerely,

Donald S. Clark
Secretary of the Commission