



# The Titan Group

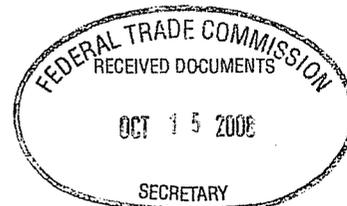
Professional Investigations

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CA-24454 • AZ-1572983

October 11, 2008

Donald S. Clark  
Office of the Secretary  
Federal Trade Commission  
Room H-135  
600 Pennsylvania Avenue, NW  
Washington, DC 20580



Re: Proposed Consent Order

**In the Matter of Reed Elsevier and Choice Point**

**FTC File No. 081-0133**

Dear Mr. Clark:

I'm writing on behalf of The Titan Group, Professional Investigations regarding the proposed consent order and acquisition of Choice Point by Reed Elsevier. We provide critical services to government agencies, attorneys, insurance companies, state and federal courts, and others. We rely **extensively** on services provided by both Reed Elsevier and Choice Point, and their subsidiaries, to assist us in serving these clients.

Over the past several years there has been tremendous consolidation among providers of public records services. This proposed acquisition will further reduce competition in the industry. Although there are several providers of data services in the marketplace, they are resellers of data provided by the respondents.

The Commission's complaint found that this acquisition would be anticompetitive and a violation of antitrust law in the market for the sale of public records information to law enforcement agencies. The same effects would be felt in the market for sale of public records to the private sector.

It is important to have access to data from several suppliers during the conduct of an investigation. Limited resources reduce both the quality and quantity of information available.

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We, as small businesses, do not have the financial weight to bargain effectively with large entities in a non-competitive environment.

We urge the Commission not to approve the acquisition until respondents can divest themselves of public records services provided to private industry as well as to law enforcement.

Unless an appropriate remedy is offered, our business will suffer irreparable harm. When competition is reduced, incentives for innovation are reduced, prices rise and service suffers.

Thank you for your consideration.

Sincerely,

*Edward Saucerman*