October 22, 2013

Michael E. Wilson
Automotive Recyclers Association
Commonwealth of Virginia

      Re: *In the Matter of Solera Holdings, Inc., File No. 121-0165, Docket No. C-4415*

      Thank you for your comments regarding the proposed Consent Order accepted by the Federal Trade Commission for public comment in the above-captioned matter. As we understand your comment, you have concerns that Solera would sell the divested assets to an entity that would use them exclusively for its own operations, and not offer them to automotive recyclers. The Commission has reviewed your comment in connection with its decision concerning whether to accord final approval to the proposed consent order.

      The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and it has been given careful consideration. The Commission evaluated how the acquisition, if unremedied, would lead to higher prices and reduced innovation for yard management systems ("YMS") sold to automotive recyclers and crafted the Decision and Order to protect the benefits of competition for those customers. Moreover, ASA Holdings, Inc., the proposed acquirer of the divested assets, is comprised of a group of individuals who do not own any automotive recycling operations, so they have the incentive to develop and license the YMS to automotive recyclers. In light of these considerations, among others, the Commission has determined that the public interest would best be served by issuing the Decision and Order as final. A copy of the final Decision and Order is enclosed for your information. Relevant materials also are available from the Commission's website at http://www.ftc.gov.

      It helps the Commission's analysis to hear from a variety of sources in its work on antitrust and consumer protection issues, and we appreciate your interest in this matter.

      By direction of the Commission.

                    Donald S. Clark
                    Secretary