



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Office of the Secretary

October 22, 2013

Mike Lambert
Buddy Automotive Innovations LLC
State of Colorado

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. The Commission has reviewed your comments 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. As we understand your comment, you have concerns regarding the licensing of the Hollander Interchange. When investigating acquisitions, the Commission limits itself to remedies that are required to fix competitive concerns that arise from the specific acquisition. In this acquisition, the Commission determined that the relevant product market is yard management systems. As you stated in your letter, Solera (through Audatex) and Car-Part are the only companies that can license the Hollander Interchange. As such, Actual Systems did not have any rights to license the Hollander Interchange prior to the acquisition, and the acquisition did not alter competition regarding the Hollander Interchange. Therefore, the Commission did not require any changes in the licensing of the Hollander Interchange. The Commission required Solera to grant ASA Holdings, Inc., the proposed acquirer of the divested assets, a license to the Hollander Interchange since the Commission determined that this license is required to compete in the licensing of YMS. 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