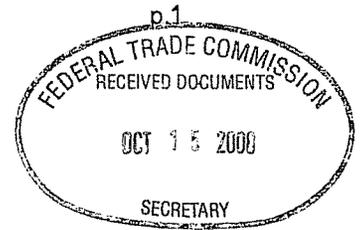


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October 11, 2008

**MR. DONALD S. CLARK**  
 Office of the Secretary  
 Federal Trade Commission  
 Room H-135  
 600 Pennsylvania Avenue NW  
 Washington, DC 20580

**Overnight Mail**

**Re: Proposed Consent Order**  
**In the Matter of Reed Elsevier and ChoicePoint**  
**FTC File No. 081-0133**

Dear Mr. Clark:

I am writing on behalf of licensed private investigators in Washington state regarding the proposed consent order and acquisition of ChoicePoint by Reed Elsevier. Our state association is comprised of investigators who provide critical services to government agencies, attorneys, state and U.S. courts and others. We rely extensively on services provided by both Reed Elsevier and Choicepoint 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 anti-competitive 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.

**MR. DONALD S. CLARK**  
**Federal Trade Commission**  
**Re: Proposed Consent Order**  
**Reed Elsevier & Choicepoint**  
**FTC File 081-0133**  
**October 11, 2008 - Page Two**

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It is important to have access to data from several suppliers while conducting any investigation. Limited resources reduce both the quality and quantity of information available. Our members, many of whom are small businesses, do not have the financial weight to bargain effectively with large entities in a non-competitive environment.

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

Unless an appropriate remedy is offered our members and their clients will suffer lasting and irreparable harm. When competition is reduced or stifled incentives for innovation are also reduced, prices rise and overall service suffers to a tremendous extent.

Thank you for your consideration.

Sincerely,

Alwin L. Farr