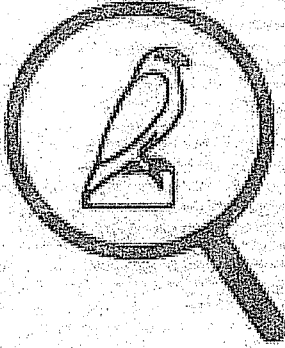


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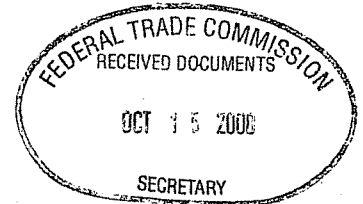


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October 13, 2008

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 ChoicePoint, FTC File No. 081-0133

Dear Mr. Clark:

I'm writing on behalf of myself and my esteemed colleagues across the United States who share my concerns as well regarding the proposed consent order and acquisition of ChoicePoint by Reed Elsevier. Our association, the National Council of Security and Investigative Services (NCISS) is comprised of investigators who provide critical services to government agencies, attorneys, state and US courts, industry and others. We rely extensively on services provided by both Reed Elsevier and ChoicePoint and their subsidiaries to assist us in serving our clients.

Over the past several years, there has been tremendous consolidation among providers of public records services. The proposed acquisition before the Commission will further severely 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 place for the sale of public records information to law enforcement agencies. The same effects would be felt in the market place for the sale of public records to the private sector individuals and companies as well.

It is important and essential, in my view, to have access to data from several different suppliers during the process of conducting a professional investigation. Limited resources reduce both the quality and quantity of information available. NCISS members, many of whom are small businesses and sole-practitioners such as myself, do not have the financial weight to bargain effectively with large entities in a non-competitive environment.

I and other members of NCISS urge that the Commission not 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 members and their clients will suffer irreparable harm. When competition is reduced, incentives for innovation are reduced, prices rise and service suffers. It is in everyone's interests to not approve this acquisition at this time.

Thank you for your consideration of my views on this matter of mutual concern.

John S. Blackburn, M.S.W.
Professional Investigator

(Original letter to file signed)