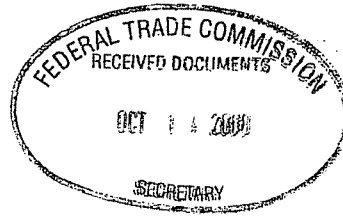


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**CheckMate Investigative Services Inc.**

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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:

As a licensed private investigator in California, I am writing with regard to the proposed consent order and acquisition of ChoicePoint by Reed Elsevier. In order to effectively serve our clients, we frequently make use of database information provided by both Reed Elsevier and ChoicePoint, and their respective subsidiaries.

Over the past several years, there has been a tremendous consolidation among providers of public record services. This proposal will further reduce competition in the industry. Although there are several providers of data services in the marketplace, they are simply resellers of the 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 record information to law enforcement agencies. Without question, 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 course of an investigation. Limited resources reduce both the quality and quantity of information available. Furthermore, private

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investigators, many of whom are small businesses, do not have the financial weight to bargain effectively with large entities, such as the respondents, in a non-competitive environment.

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

Unless an appropriate remedy is offered, licensed private investigators and others in the private sector, and their respective clients, will suffer irreparable harm. When competition is limited or restricted, incentives for innovation are reduced, prices rise, and the quality of service suffers.

Thank you for your consideration in this matter.

Yours truly,  
  
CHECKMATE INVESTIGATIVE SERVICES INC.,

/ Terry L. Gilbeau,  
President