



Office of the Secretary

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

September 22, 2008

Taraneh Maghame, Chairperson
Intellectual Property Committee
Association of Corporate Counsel
1025 Connecticut Avenue, N.W., Suite 200
Washington, DC 20036-5425

Re: *In the Matter of Negotiated Data Solutions LLC*
File No. 051-0094

Dear Ms. Maghame:

Thank you for your comments on behalf of the Intellectual Property Committee (“the Committee”) of the Association of Corporate Counsel (“ACC”) regarding the proposed consent order accepted for public comment in the above-captioned matter. The Commission has reviewed the Committee’s comments and has placed them on the public record of the proceeding.

The Committee letter expresses support for the Commission’s decision, and notes that ACC’s members have experienced first-hand the damaging effects of patent hold-ups in the standard setting context. In particular, the Committee concurs with the Commission’s observations about the potential harm of N-Data’s alleged actions to standard-setting and competition.

Thank you for your interest in this matter. After considering all comments, including the Committee’s, the Commission has determined that the public interest would be served best by issuing the Decision and Order in final form without modification.

By direction of the Commission, Chairman Kovacic dissenting.

Donald S. Clark
Secretary