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June 3, 2008

Alain Sheer
Division of Privacy and Identity Protection
Federal Trade Commission
601 New Jersey Avenue
Washington, D.C. 20580

Re: CIVIL INVESTIGATIVE DEMAND ISSUED TO "CVS CAREMARK CORPORATION"

Dear Alain:

This letter serves to memorialize our conversation yesterday afternoon concerning the Civil Investigative Demand ("CID") issued to "CVS Caremark Corporation" and received on or about May 22, 2008.

First, as we discussed, CVS objects to the breadth of Definition No. 4 concerning "Company" or CVS." CVS Corporation merged with a large Prescription Benefits Management company ("PBM"), *Caremark Rx, Inc.*, ("Caremark"), in March of 2007 -- almost two years after the commencement of the applicable time frame set forth in Instruction No. 1 in the CID. Caremark, as a PBM, has been historically engaged in businesses that do not entail retail pharmacy environments. Caremark, as a PBM, had no role in the incidents that form the basis of the CID or previous requests. Accordingly, with respect to the scope of the specifications of the CID, please confirm that the CID relates solely to the CVS/pharmacy retail operations.

Second, notwithstanding the global concerns and issues that were identified in our call and without waiving objections relating to the nature, materiality, or relevance of any or all of the specifications set forth in the CID, CVS is willing and able to produce documents responsive to Request Nos. 1, 2, 3, and 9 by June 11, 2008, the return date identified on the CID. Yet, because of vacations and other scheduling difficulties presented during this post-Memorial Day period, CVS is requesting an extension of time to respond to Document Request Nos. 4 and 8 and Interrogatories 2, 3, 4, 5, and 8 through Friday, June 20, 2008.

Third, as we discussed, CVS has concerns with the breadth and scope of Document Request Nos. 5, 6 and 7 and Interrogatories 6 and 7 concerning CVS's electronic security policies. Simply put, CVS believes that a wholesale review of its electronic security policies based upon the CASPIAN provoked ExtraCare loyalty card FSA event referred to in the CID is inappropriate. Putting that unique and distinguishable event aside, we have confirmed that there has been no security breach incident of unauthorized electronic access to consumers' personal information associated with the retail division of CVS/pharmacy in the last five (5) years. (See Interrogatory No. 1.)

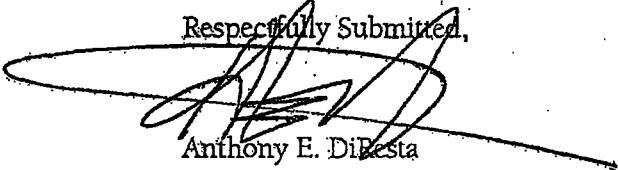
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Accordingly, we propose that we will provide all documentation of the ExtraCare loyalty card FSA issue as a starting point, while holding in abeyance the production and review of wide-ranging electronic security policies.

Thank you for your anticipated cooperation in seeking a clarification concerning the scope of the CID, an extension of time for responding to certain specifications, and a clarification of the issues relating to information concerning electronic security policies.

Respectfully Submitted,


Anthony E. DiResta

AED:eh

cc: Loretta Garrison
Kristin Cohen
Mark Melodia

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