



Office of the Secretary

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

March 15, 2012

David I. Gelfand, Esquire
Cleary, Gottlieb, Steen & Hamilton
2000 Pennsylvania Ave., NW
Washington, DC 20006

Re: *In the Matter of Healthcare Technology Holdings, Inc.*
FTC File No. 111-0097, Docket No. C-4340

Dear Mr. Gelfand:

This letter responds to the *Petition of Healthcare Technology, Inc. for Approval of Proposed Divestiture* ("Petition") filed by Healthcare Technology, Inc. ("Healthcare Technology") on January 12, 2012, requesting that the Commission approve Healthcare Technology Inc.'s proposed divestiture of the SDI Audits Business to inVentiv Health, Inc. ("inVentiv") pursuant to the Decision and Order in this matter. The Petition was placed on the public record for comments until February 27, 2012 and no comments were received.

After consideration of the proposed divestiture as set forth in the Petition and supplemental documents, as well as other available information, the Commission has determined to approve the proposed divestiture. In according its approval, the Commission has relied upon the information submitted and representations made in connection with the Petition, and has assumed them to be accurate and complete.

By direction of the Commission.

Donald S. Clark
Secretary