



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

Office of the Secretary

November 30, 2012

Ms. Susan Bailey
State of Nevada

Re: *In the Matter of Renown Health, FTC File No. 1110101, Docket No. C-4366*

Dear Ms. Bailey:

Thank you for your comment regarding the proposed consent order accepted by the Federal Trade Commission for public comment in the above-captioned matter. As we understand your comment, you have concerns about whether the proposed consent order is sufficient to restore competition in the Reno, Nevada area. In particular, you believe that the Decision and Order in this matter should require Renown Health to release at least 60% of the cardiologists that it currently employs. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16. C.F.R. § 4.9(b)(6)(ii), and it has been given careful consideration.

The investigation at issue examined Renown Health's acquisition of two cardiology practices and its employment of the physicians affiliated with those practices. According to the Commission's complaint, Renown Health first became a competitor in the cardiology services market when it acquired the first cardiology group. Through its acquisition of the second cardiology group, it allegedly eliminated competition for cardiology services in the Reno area. However, neither group employed as much as 60% of the cardiologists in the Reno area prior to the acquisitions at issue. For that reason, there is no basis for the Commission to seek a remedy that would require Renown to release a greater percentage of physicians than it had obtained through the acquisition that is alleged to have raised competitive concerns.

In light of this consideration, among others, the Commission has determined that the public interest would be served by issuing the Decision and Order in final form. A copy of the final Decision and Order is enclosed for your information. Relevant materials are also available from the Commission's website at <https://www.ftc.gov>.

It helps the Commission's analysis to hear from a variety of sources in its work on antitrust and consumer protection issues, and we appreciate your interest in this matter.

By direction of the Commission.

Donald S. Clark
Secretary