



Office of the Director  
Bureau of Competition

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

SEP 23 2009

Gregory S.C. Huffman, Esq.  
Thompson & Knight L.L.P.  
1722 Routh Street, Suite 1500  
Dallas, TX 75201

Re: Dallas Methodist Physicians Network  
Matter No. 021-0076

Dear Mr. Huffman:

The Federal Trade Commission has conducted a nonpublic investigation to determine whether your client, Dallas Methodist Physicians Network, or any other persons, partnerships, or corporations, had engaged or is engaging in unfair methods of competition in or affecting commerce in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended, by, among other things, collectively agreeing on, or negotiating for, terms or conditions upon which it would deal with health insurance firms or other third-party payors ("payers"), or collectively refusing to deal or threatening to defuse to deal with payors.

Upon further review of this matter, it now appears that no additional action is warranted by the Commission at this time. Accordingly, pursuant to authority delegated by the Commission, 49 Fed. Reg. 6171 (1984), the investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Sincerely yours,

Richard A. Feinstein  
Director