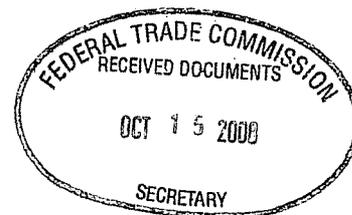


ORIGINAL



**PROBE NORTHWEST, INC.**

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Donald S. Clark  
Office of the Secretary  
Federal Trade Commission, Room H-135  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Re: Proposed Consent Order (Please do not approve)  
*In the Matter of* Reed Elsevier and ChoicePoint, FTC File No. 081-0133

Dear Mr. Clark:

I'm writing on behalf of Probe NW, Inc. regarding the proposed consent order and acquisition of ChoicePoint by Reed Elsevier. Our association is comprised of investigators who provide critical services to government agencies, attorneys, state and US courts and insurance companies. We rely heavily on services provided by Reed Elsevier and ChoicePoint and their subsidiaries to provide crucial services to these clients.

Over the past several years there has been tremendous consolidation among providers of public records services. This proposed acquisition will totally stifle competition in the industry. Although there are several providers of data services in the marketplace, they are but resellers of data provided by the respondents.

The Commission's complaint found that this acquisition would be anticompetitive and a violation of antitrust law in the market for the sale of public records information to law enforcement agencies. The same effects would be felt in the market for sale of public records to the private sector, including our insurance and government clients.

It is vital to have access to data from several suppliers during the conduct of insurance fraud investigations. Limited resources reduce, or eliminate the ability to halt fraud and provide civil justice.

We urge that the Commission **not** approve the acquisition. Otherwise our members, their clients, and the general public will suffer irreparable harm. *When competition of information providers is reduced, in this information age, the board is cleared for civil fraud to run rampant.* Law enforcement does not mettle in "civil" torts. This type of antitrust weighs heaviest on society.

Thank you for your consideration.

*Susan M. Wakeman*

Susan M. Wakeman, BA, CFE  
President