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ASSOCIATES, INC.**

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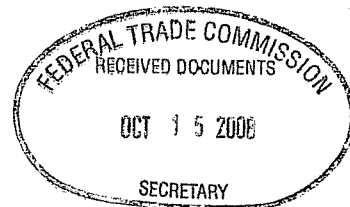
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11 October 2008

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



**Re: Proposed Consent Order  
In the Matter of Reed Elsevier and ChoicePoint, FTC File No. 081-0133**

Dear Mr. Clark:

As President of MacIntire & Associates, Inc., an Arizona based investigative and consulting agency, and as President of the Arizona Association of Licensed Private Investigators (AALPI), I'm writing with regard to the proposed consent order and acquisition of ChoicePoint by Reed Elsevier. Our agency and the PI association for Arizona is comprised of investigators who provide critical services to government agencies, attorneys, state and US courts and others. We rely extensively on services provided by both Reed Elsevier and ChoicePoint and their subsidiaries to assist us in serving these clients.

Over the past several years there has been tremendous consolidation among providers of public records services. The proposed acquisition will significantly reduce competition in the industry. Although there are several providers of data services to our industry and others, they are 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.

We feel it important to access data from several suppliers during the pursuit of our investigative efforts. Limited resources reduce both the quality and quantity of information available. And our members, many of whom are small businesses, do not have the financial weight to bargain effectively with large entities in a non-competitive environment.

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We strongly urge that the Commission not approve the acquisition until respondents can divest themselves of public records services provided to private industry as well as to law enforcement.

Unless an appropriate remedy is offered, our agency and the association's members and ultimately the client will suffer irreparable harm. When competition is reduced, incentives for innovation are reduced, prices rise and service suffers.

Very truly yours,

 John R.W. MacIntire Jr., President