EMPLOYERSEDGE
UNEMPLOYMENT COST CONTROL SOLUTIONS

May 27, 2008

FTC – Office of the Secretary
Room H-135
600 Pennsylvania Ave NW
Washington, DC 20580

To Whom It May Concern:

On behalf of Employers Edge, I am submitting our comments in regards to the FTC's complaint and proposed settlement with the Talx Corporation. This stems from the April 28th release at the FTC's web site, detailing the proposed consent order and the terms of the settlement with Talx.

As a company that has been severely impacted by Talx's actions, we want to inform the FTC that we feel the proposed remedies to be fair and adequate to accomplish the objective of increasing the competition in this marketplace. Employers Edge was founded just three short months after Talx made their last acquisition of Colorado based Employers Unity, with the simple goal of offering a quality alternative to Talx. We did not begin selling in this market until eight months after the acquisition, and were encouraged to find many companies happy to find an alternative.

However, we quickly learned that all Employers Unity customers received new contracts during the first six months of 2006. Many clients assumed the agreement was simply changing the name from Employers Unity to Talx, but were dismayed to find out these agreements had confusing language locking them in to a five year initial term. While a few customers caught this language and did not sign the agreement, many customers did sign the agreement, effectively locking out any competition until 2011! The remedy to allow customers to leave these long-term agreements is appropriate and necessary.

Employers Edge's Matt Brady sat out his non-compete period of November 1, 2005 to November 1, 2007, not willing to risk a lawsuit by Talx. We certainly agree with the non-compete related remedy, and also agree with and support the other terms of the settlement, and see them as necessary to enable competition in this market.

Respectfully submitted,

Stephen D Bell
President
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