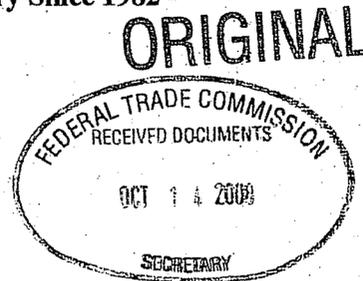




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October 10, 2008



Mr. 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:

I'm writing on behalf of all investigators across the United States and the professional associations of which I am affiliated (NCISS, NALI, NJLPIA) regarding the proposed consent order and acquisition of ChoicePoint by Reed Elsevier. Our associations are comprised of investigators that provide critical services to government agencies, law firms, insurance companies, State, and US courts, and private and commercial entities involved in legal matters. 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 above proposed acquisition will further reduce competition in the industry. Although there are several providers of data services in the marketplace, they are resellers of data provided by the respondents.

The Commission's complaint found that this acquisition would be adverse to competition 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.

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Mr. Donald S. Clark
Federal Trade Commission
Washington, DC

RE: Proposed Consent Order
October 10, 2008
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It is important to have access to data from several suppliers during the administration of an investigation. Limited resources reduce both the quality and quantity of available information. 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.

We urge the Commission not to 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 members - and their clients - will suffer irreparable harm. When competition is reduced, incentives for innovation are reduced, prices rise, and service suffers.

Thank you for your consideration.

Sincerely,

Alexander Toia, CCLA, LPI
President / Owner