

Comment Info: =====

General Comment: It's fanciful to think that the divestiture of a single store will compensate for the anti-competitive effects of the acquisition in question. For example, in New York City, where I live, there may be two or three Medicine Shoppes in the five boroughs. Let's assume that I could save \$5 by going to a Medicine Shoppe instead of a Rite Aid, and that I'm willing to spend an hour to save the money. The chances are, I would have to take the subway to get to the Medicine Shoppe.

If so, I incur a cost of \$4 in subway fares to save \$5, leaving me a net savings of \$1. It isn't worth it. Indeed, I can't imagine a plausible set of facts that would make it worth it.

The FTC deludes itself and the public by purporting that the divestiture provision adequately addresses the anti-competitive effects of the proposed merger. The FTC should be blocking the merger, not engaging in what amounts to a charade.