



Office of the Secretary

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

June 30, 2005

S.M. "Skip" Oliva  
President  
The Voluntary Trade Council  
Post Office Box 100073  
Arlington, Virginia 22210

Re: *In the Matter of San Juan IPA, Inc., File No. 031 0181*

Dear Mr. Oliva:

Thank you for your comments on behalf of The Voluntary Trade Council ("VTC") regarding the proposed consent order accepted by the Federal Trade Commission for public comment in the above-captioned matter. In your letter, you indicate that VTC "reaffirms and restates its previous comments" concerning a number of earlier Commission consent orders, and "chooses not to contribute any further comments at this time." Your letter includes as an attachment a copy of the public comment VTC filed on the consent order the Commission issued in *In the Matter of Preferred Health Services, Inc., File No. 041 0099*.

The Commission has reviewed your comments in connection with its decision concerning whether to accord final approval to the proposed consent order, and has also placed your comments on the public record. With respect to VTC's allegations concerning the manner in which the Commission enforces the antitrust laws -- which appear in its comment on the *Preferred Health Services* consent order -- I should note that, as the Commission has testified,

[f]or decades, the FTC has worked to facilitate innovative and efficient arrangements for the delivery and financing of health care services by challenging artificial barriers to competition among health care providers. . . . The Commission's consent orders [in these matters] put a stop to allegedly collusive conduct harming employers, individual patients, and health plans by depriving them of the benefits of competition in the purchase of physician services.<sup>1</sup>

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<sup>1</sup> See *An Overview of Federal Trade Commission Antitrust Activities* (July 24, 2003), Prepared Statement of the Federal Trade Commission, Presented By The Honorable Timothy J. Muris, Chairman, Before the Committee on the Judiciary, Antitrust Task Force, United States House of Representatives (July 24, 2003), at 3, available at <http://www.ftc.gov/os/2003/07/antitrustoversighttest.htm> (copy enclosed).

After appropriate consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. A copy of the final Decision and Order is enclosed for your information. Relevant materials also are available from the Commission's website at <http://www.ftc.gov>.

By direction of the Commission, Chairman Majoras not participating.

Donald S. Clark  
Secretary