

**CPR** Institute for Dispute Resolution*Setting the ADR Agenda  
for the 21st Century**President***James F. Henry***Executive Committee Chair***Richard S. Paul**

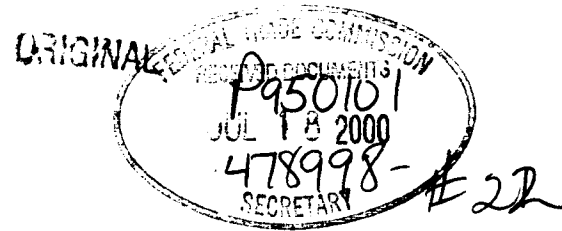
Senior Vice President &amp;

General Counsel

Xerox Corporation

July 10, 2000

Donald S. Clark  
Office of the Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580.



Re: Comments regarding B2B Electronic Marketplaces

Dear Mr. Clark:

CPR Institute for Dispute Resolution respectfully submits this brief letter by way of public comment in connection with the recent Workshop on Business-to-Business E-Commerce. CPR Institute is a 21-year old not-for-profit coalition of corporate law departments, leading law firms, academics and public agencies. The Institute advocates the use of alternatives to litigation in major business and public disputes.

We note that, of the many speakers at the workshop who offered analyses of the corporate sourcing and procurement process, only one speaker included dispute resolution with such topics as needs identification, pricing and invoicing. In fact, business disputes are inevitable, and should be managed as efficiently as every other aspect of intercorporate contracting.

We therefore hope that the FTC, mindful of the public interest in avoiding the societal costs of protracted litigation, will encourage all market participants to plan to manage disputes with the same foresight and creativity that they are planning to manage other aspects of these business relationships.

Sincerely,

James F. Henry  
President