

July 16, 2007

Donald S. Clark
Secretary, Federal Trade Commission
600 Pennsylvania Avenue NW
Room H135
Washington, DC 20580



Dear Secretary Clark:

This letter is in regard to the South Carolina Board of Dentistry, Docket No. 9311.

The Missouri Dental Association supports the traditional regulation of dentistry by the states and opposes the regulation of dentistry by a federal antitrust agency, whose focus is on competition rather than on quality of care. Because of this, the Missouri Dental Association supports the comments of the American Dental Association, that stated:

The facts of this case demonstrate why finalization of a decree—with its invasion of sovereignty of a state—would be an abuse of the Commission's discretion. Specifically, South Carolina's administrative processes proved themselves more than adequate to address the concerns that animated the Commission. There is no substantial basis for thinking that the decree is necessary to vindicate those concerns. And there is every reason to believe that the South Carolina legislature is better suited to make policy judgments about balancing access and quality considerations in dentistry for the people of South Carolina than is the Federal Trade Commission.

For all these reasons the Commission should withdraw the consent decree in this Docket.

Respectfully submitted,

JC Standlee, DDS
President

Vicki Wilbers
Executive Director

Cc: Tamra Kempf, Chief Legal Counsel
American Dental Association