



Office of the Secretary

United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

October 22, 2013

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Re: In the Matter of Solera Holdings, Inc., File No. 121-0165, Docket No. C-4415

Thank you for your comments regarding the proposed Consent Order accepted by the Federal Trade Commission for public comment in the above-captioned matter. The Commission has reviewed your comments in connection with its decision concerning whether to accord final approval to the proposed consent order.

The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and it has been given careful consideration. During the course of the Commission's lengthy investigation, it considered all information relevant to the likely effects of the acquisition, including past actions over combinations in the parts software market initiated either by the Commission or by the private bar. In addition, the Commission relied on current evidence and information to conclude that the sale of yard management systems ("YMS") is the appropriate market in which to assess the likely effects of this acquisition at issue in this matter. For instance, the Commission spoke with and reviewed information provided by a variety of market participants before determining that YMS was the appropriate relevant market. This evidence demonstrated that auto recyclers require that their inventory systems interface with the Hollander Interchange (an auto parts database that identifies the interchangeability of auto parts among vehicle makes and models) to organize auto inventory. As a result, they cannot and do not consider licensing more generic automated inventory systems instead of YMS. The Commission also determined that it is unlikely that a new company could enter, or that a current competitor could reposition, to counteract the anticompetitive effects of the acquisition based on the Commission's review of the time that companies have spent to develop YMS, and because of the difficulty of obtaining a license to the Hollander Interchange.

Based on this analysis, and the result of past remedies, the Commission determined the appropriate remedy for this matter. In light of these considerations, among others, the Commission has determined that the public interest would best be served by issuing the Decision