

medical services was not reasonably necessary to the achievement of material reductions in the cost of participating physicians' (a) fee-for-service medical services and (b) other than fee-for-service medical services.

RESPONSE: Denied.

3. Admit that the establishment by NTSP of minimum contract prices for fee-for-service medical services was not reasonably necessary to the achievement of material

improvements in the quality of participating physicians' (a) fee-for-service medical services and (b) other than fee-for-service medical services.

RESPONSE: Denied.

4. Admit that the establishment by NTSP of minimum contract prices for fee-for-service medical services was not reasonably necessary to the achievement of material

cost of participating physicians' (a) ~~fee-for-service~~ medical services and (b) other than fee-

for-service medical services.

RESPONSE: Denied.

7. Admit that the deparicipating by NTSP of NTSP physicians from payor agreements that do not satisfy minimum contract prices established by NTSP for fee-for-services medical services was not reasonably necessary to the achievement of material improvements in the quality of participating physicians' (a) fee-for-service medical services and (b) other than fee-for-service medical services.

RESPONSE: Denied.

Respectfully submitted,



Gregory S. C. Huffman
William M. Katz, Jr.
Gregory D. Binns

THOMPSON & KNIGHT LLP
1700 Pacific Avenue, Suite 3300
Dallas TX 75201-4693
214 969 1700
214 969 1751 - Fax
gregory.huffman@tklaw.com
william.katz@tklaw.com
gregory.binns@tklaw.com

SPECIALTY PHYSICIANS

CERTIFICATE OF SERVICE

I, Gregory S. C. Huffman, hereby certify that on December 17, 2003, I caused a copy of Respondent's Obligations and Responses to Complaint Counsel's Requests for Admissions

to Respondent North Texas Specialty Physicians to be served upon the following persons by First

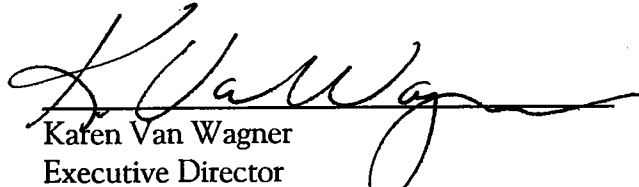
Michael Bloom
Senior Counsel
Federal Trade Commission
Northeast Region
One Bowling Green, Suite 318

Office of the Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue NW
Washington, D.C. 20580

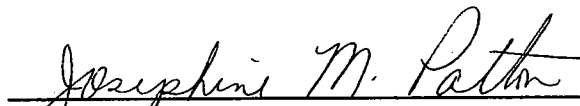
VERIFICATION

I, Karen Van Wagner, Executive Director of North Texas Specialty Physicians, have read the foregoing Respondent's Objections and Responses to Complaint Counsel's Requests for Admissions to Respondent North Texas Specialty Physicians. and know the contents thereof.

Dated: 12/17, 2003.


Karen Van Wagner
Executive Director
NORTH TEXAS SPECIALTY PHYSICIANS

SUBSCRIBED AND SWORN TO BEFORE ME in the County of Tarrant, State of Texas, this 17 day of December, 2003.


NOTARY PUBLIC

My commission expires

