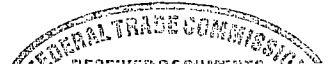


UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION



form of legal entity. The acts and knowledge of a person are defined to include the acts and knowledge of that person's directors, officers, members, employees, representatives, agents, subsidiaries, and attorneys.

D "NTSD" refers to Defendant North Texas Specialty Physicians, its employees,

representatives, attorneys, agents, past and present participating physicians, directors,

officers, and consultants.

E. The singular includes the plural and vice versa; the terms "and" and "or" shall be both

NTSP 003960, 004948, 004634, and 014432, among others.

K. "Minimum contract price" means "Contracted Minimums" or "Board Minimums" as those or similar phrases are used in the documents provided to the Federal Trade Commission by NTSP bearing Bates numbers NTSP 003960, 004634, 004948, and 014432, among others.

L. "Aggregated data" means data or information from or pertaining to more than one person that has been altered or manipulated so that the specific identity or response of any person

via "Fax Alert."

3 Admit that each survey, poll, or other means through which NTSP solicited or obtained

information from participating physicians relating to physician compensation for the provision of future fee-for-service medical services, other than "Annual Polls" as that phrase is used in Fax Alert 62 of September 14, 2001, bearing Bates Number NTSP 014913, pertained to a specific payor(s) identified in the survey, poll, or other means through which NTSP solicited, or related communications.

4 Admit that each survey, poll, or other means through which NTSP solicited or obtained

"Contracted Minimums," as that phrase is used in Fax Alert 62 of September 14, 2001,

bearing Bates Number NTSP 014012 whether or not referred to as "Contracted

Minimums."


7. Separately for each year from 1995 to the present, admit that NTSP utilized minimum contract prices or "Contracted Minimums . . . when negotiating managed care contracts on behalf of its participants," as described in Fax Alert 62 of September 14, 2001, bearing Bates Number NTSP 014913, whether or not referred to as "Contracted Minimums."
8. Admit that in response to the concerns of several [NTSP] members, NTSP established the maintaining of a \$200,000/600,000 malpractice insurance limit for its participating physicians as a priority issue on all of its contracts with payors.
9. Admit that during the period January 1998 to the present NTSP took one or more actions

in furtherance of its objective of maintaining a \$200,000/600,000 malpractice insurance

NTSP's participating physicians.

Dated: December 30, 2003

Respectfully submitted,

 *Michael Bloom*

Michael Bloom
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Northeast Region
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(212) 607-2801
(212) 607-2822 (facsimile)

CERTIFICATE OF SERVICE

I, Sarah Croake, hereby certify that on December 30, 2003, I caused a copy of Complaint
Counselor's Requests for Admissions to Defendant to be served upon the following:

Gregory Huffman, Esq.
Thompson & Knight, LLP
1700 B Street, N.W. Suite 2000