

UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

September 22, 2008

Taraneh Maghame, Chairperson Intellectual Property Committee Association of Corporate Counsel 1025 Connecticut Avenue, N.W., Suite 200 Washington, DC 20036-5425

Re: In the Matter of Negotiated Data Solutions LLC File No. 051-0094

Dear Ms. Maghame: