

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

Office of the Secretary

July 15, 2011

David W. Proctor, Esq.  
Johnston Barton Proctor and Rose LLP  
Colonial Brookwood Center  
569 Brookwood Village Suite 901  
Birmingham, AL 35209

Re: Alabama Dental Association, File No. 1010124

Dear Mr. Proctor:

The Federal Trade Commission has conducted a nonpublic investigation to determine whether your client, the University of Alabama School of Dentistry Alumni Association, in concert with other parties, has engaged in unfair methods of competition in or affecting commerce in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended, by refusing to deal, threatening to refuse to deal, or otherwise improperly coercing third parties, including but not limited to, dentists, dental students, dental schools, and non-profit and public oral health care providers.

Upon reviewing this matter, it now appears that no additional action is warranted by the Commission at this time. Accordingly, this investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

By direction of the Commission.

Donald S. Clark  
Secretary