



# I. INTRODUCTION

Pursuant to 15 U.S.C. § 57b-1(f) and 16 C.F.R. § 2.10, National Processing Company







processing industry as a whole and ultimately harm consumers. The Vantiv Parties expended









#### IV CONCLUSION

Because staff cannot pursue discovery simultaneously through both the CIDs and Rule 45 subpoenas, the Commission should either quash the CIDs or direct staff to withdraw the



# EXHIBIT 1











# EXHIBIT 2







