Dear Federal Trade Commission,

As a community pharmacist I all to often see first hand the repercussions of these vertical mergers in
health care. There should be a process in place to more frequently and thoroughly evaluate these
consolidations. There should also be stricter antitrust policies in place to protect patients from the
repercussions of these mergers. These mergers make it more and more difficult for community
pharmacies to exist. I have many patients whose insurance requires that they use a specific chain
pharmacy. However, there is no local option for that chain so the patient has to either drive 60+ miles,
utilize mail order, or pay cash price for their medications. This takes business away from community

• Anticom pe titiv e exploitation o f com pe titiv ely se nsitive info rm at ion.

Co ntinued v ertical he alt hcare co nsolidatio n could further im pede competit ion, leading to few er choices

and higher he althcare co sts. There fo re, I respectfully ask t he agencies to vigo ro usly o verhaul vertical

m erger enfo rcem ent po licy.

L astly, the age ncies should rigo ro usly scrutinize claimed efficie ncies from vertical m ergers, including

whether any

efficiencies will be passe d o n to co nsumers. Historically, the agenc ies' hav e assume d t hat

ve rtical m ergers yield s ignific ant procompetitive efficie ncies. W ithout ev idence that a pro po sed me rger

is likely to generate significant cost savings or other benefits that will be passed on to consumers, the

age ncies sho uld no t presum e that theo retical efficie ncies will occur. Us ing the CVS/ Aet na m erger as an

exam ple , despite claims of procom petitive benefits,prhEa. 4 (in). (y8 35.3 (f) .7 (,)u . (e) m. 5 er)3 . (d) R.6 (en)p.3 (f)-3.6 (r) 3.