

Analysis of Proposed Consent Order to Aid Public Comment

The Federal Trade Commission has accepted agreements to proposed consent orders from Summit Technology, Inc. ("Summit"), located at 21 Hickory Drive, Waltham, Massachusetts 02154 and VISX, Inc. ("VISX"), located at 3400 Central Expressway, Santa Clara, California 95051.

The proposed consent orders ("Orders") have been placed on the public record for sixty (60) days for reception of comments by interested persons. Comments received during this period will become part of the public record. After sixty (60) days, the Commission will again review the agreements and the comments received and will decide whether it should withdraw from the agreements or make final the agreements' proposed orders.

On March 24, 1998, the Commission issued a complaint alleging that Summit and VISX violated Section 5 of the FTC Act, as amended, 15 U.S.C. § 45 (the "Complaint"). The Orders, if issued by the Commission, would settle all of the allegations of the Complaint against Summit and settle part of the allegations of the Complaint against VISX (the "Complaint").

procompetitive efficiencies, the FTC issued the Complaint. Thereafter, Summit and VISX