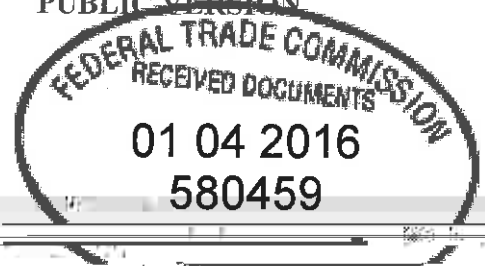


UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

PUBLIC VERSION



In the Matter of

The Penn State Hershey Medical Center,
a corporation,

and

Docket No.

DiagnoseHealth System

RESPONDENTS' ANSWERS AND DEFENSES

a corporation.

I.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

response is required. To the extent a response is required, Respondents deny those allegations.

21. Respondents lack knowledge or information sufficient to comment on the allegations.

[REDACTED]

54. Respondents lack knowledge or information sufficient to form a belief as to the Commission's

[REDACTED]

Respondents' Recent [REDACTED] Agreements

Prevent Competitive Harm

allegations set forth in Paragraph 54, and therefore deny them.

55. Respondents deny the allegations set forth in Paragraph 55.

D. The Merger Eliminates Vital Quality Competition

56. Respondents deny the allegations set forth in Paragraph 56.

57. Respondents admit that Pinnacle has always endeavored to provide high-quality service that satisfies patients. Respondents deny the remaining allegations set forth in Paragraph 57.

58. Respondents deny the allegations set forth in Paragraph 58.

59. Respondents admit that Pinnacle has improved the quality of care and implemented operational improvements and best practices in its hospitals. Respondents lack knowledge or information sufficient to form a belief as to the "internal documents" the Commission references, and therefore deny the allegations insofar as they rely on any such documents. Respondents deny the remaining allegations set forth in Paragraph 59.

60. Respondents admit that Hershey has begun constructing a new outpatient ambulatory facility and has expanded outpatient services in Cumberland County. Respondents deny the remaining allegations set forth in Paragraph 60.

61. Respondents admit that Hershey strives to reduce costs and improve its quality and

FOURTH DEFENSE

[REDACTED]

EIGHTH DEFENSE

[REDACTED]

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2016, I filed the foregoing document with the Federal Trade Commission.

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
Washington, DC 20580

The Honorable D. Michael Chappell
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-110
Washington, DC 20580

I further certify that I delivered via electronic mail a copy of the foregoing document to:

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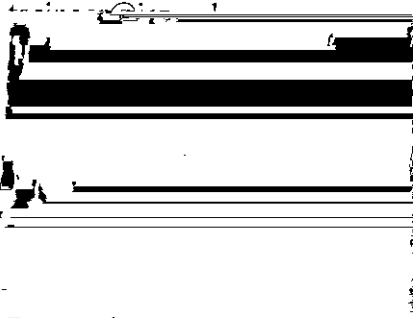
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