



Office of the Secretary

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

October 29, 2010

Philip David
ARM, Ltd.

Re: *In the Matter of Intel Corporation, Docket No. 9341*

Dear Mr. David:

Thank you for your comments regarding the Proposed Consent Order accepted by the Federal Trade Commission for public comment in the above-captioned matter. Your comment suggests that the Proposed Consent Order be extended to cover Intel's business practices in all markets, not just the markets for products used in computers.

The Commission's complaint focused on Intel's anticompetitive conduct in the markets for CPUs and GPUs that are used in desktop, notebook, netbook (or nettop) computers, and servers. Intel's conduct in other markets was not a subject of the Commission's Complaint against Intel and is therefore beyond the scope of the Consent Order. Intel has yet to become a significant supplier in the markets for microprocessors that power smaller devices and Intel's conduct in those markets was not at issue in the Complaint. Because Intel has such a small position in these markets, it is unlikely that business practices similar to those in the CPU markets would have the same deleterious effects on competition. Further, the Proposed Consent Order is tailored to remedy the effects of Intel's specific conduct in the market context in which that conduct took place. Intel's adherence to the specific provisions will not insulate it from future Commission scrutiny or enforcement action if its conduct otherwise violates the antitrust laws. The Commission retains the latitude to take action if Intel engages in anticompetitive conduct in the future.

The Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without the modifications you suggest. A copy of the final Decision and Order is enclosed for your information. Relevant materials also are available from the Commission's website at <http://www.ftc.gov>.

It helps the Commission's analysis to hear from a variety of sources in its work on antitrust and consumer protection issues, and we appreciate your interest in this matter.

By direction of the Commission, Commissioner Kovacic recused.

Donald S. Clark
Secretary