

The Source and Petris Center Submits Comments in Support of Federal Draft Merger Guidelines

On September 18, The Source on Healthcare Price and Competition, together with UC Berkeley's Petris Center, submitted public comments on the [Federal Draft Merger Guidelines](#) published on July 19. Jointly released by the Federal Trade Commission (FTC) and Department of Justice (DOJ), the draft guidelines proposed new considerations and guidance in the antitrust review of mergers and acquisitions, taking into account new developments and market realities in recent years. These new guidelines would replace the horizontal merger guidelines of 2010 and vertical merger guidelines of 2020 which have been withdrawn by the agencies as outdated.

The [comments we submitted](#) applauded the updates to the merger guidelines as essential to improving the oversight of consolidation in the health care sector. Specifically, the proposed guidelines would review and address new consolidation trends in the healthcare industry such as serial acquisitions by private equity investment, vertical and other non-horizontal consolidation, and cross-market mergers.

Read our submitted comments here: [Comments of Professors of Law and Economics, Economist, and Health Policy Researchers on the Draft Merger Guidelines](#). All other public comments relating to the draft merger guidelines can be viewed [here](#).