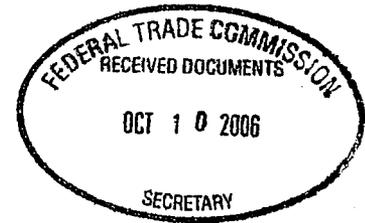


October 6, 2006

Donald S. Clark
Office of the Secretary
Federal Trade Commission
Room H-135 (Annex Z)
600 Pennsylvania Avenue NW
Washington DC 20580



RE: Comments Regarding Section 2 Hearings, Project No. P062106 – Two-Sided Platforms

Dear Mr. Clark:

I am pleased to submit my comments in the above-referenced proceeding on Single-Firm Conduct and Antitrust Law. I have enclosed my statement *Two-Sided Platforms and Analysis of Single-Firm Conduct*, together with two papers that I have previously (co-)written on this topic. My conclusion is that there is no general reason, at least at this point in the literature, to believe that two-sided platforms are more or less likely than other businesses to engage in anticompetitive practices. When two-sided platforms are the subject of antitrust analysis, proper analysis should consider the implications of two-sidedness for evaluating market definition, assessing market power, considering efficiencies, and assessing anticompetitive effects.

Please confirm receipt and let me know if you have any questions about my statement. Thank you very much.

Regards,

David S. Evans
Chairman, eSapience, Ltd., Cambridge, MA
Executive Director, Jevons Institute for Competition Law and Economics and Visiting Professor,
University College London, London, U.K.
