



# **Software4healthcare, Inc.**

August 20, 2014

Citizen Complaint Center, Antitrust Division  
950 Pennsylvania Ave., NW  
Room 3322  
Washington, DC 20530

Regarding: Wellpoint, Inc antitrust complaint by Software4healthcare, Inc.

Dear Citizen Complaint Center, Antitrust Division,

I wish to file a formal antitrust complaint against Wellpoint, Inc, located at 120 Monument Circle; Indianapolis, IN.

Wellpoint's wholly owned subsidiary, National Government Services (NGS), has used its monopolistic position as the Medicare contractor for New England to force me to buy services from private companies, who are also my competitors, and enter into odious legal agreements with those private companies, duplicating services that I have already performed for my customers, providing no value to me, and disrupting my business. NGS has stated that they have outsourced certain network services to a group of six private companies, but in fact NGS has not legally outsourced to these private companies, does not pay them for services, and does not have the HIPAA Business Associate Agreements with them that are required by HIPAA laws when a plan outsources the transaction of health data. Instead, NGS has force me to execute those legal agreements with the private companies, and then pay those companies for their services. NGS is not outsourcing.

NGS's anti-competitive behavior also impacts 100,000+ Medicare doctors, forcing them directly or indirectly to purchase services that they should not need from these so called "outsourced private companies". This is costing tens of million dollars per year in direct expenses and extra labor costs for these doctors. Wellpoint may save a few \$100,000 a year by these tactics, which is their likely motivation for this behavior.

Please see the attached two page letter for the details. Also, I have letters from Wellpoint, NGS, CMS, and U.S. Senator Shaheen on my web site: [www.StopNgsNow.com](http://www.StopNgsNow.com). I set up that web site so all the relevant documents and history are available to all concerned, and I hope you will go there to see the backup to my complaint.

I have been writing medical billing software and setting up small healthcare practices since 1985, and have been operating a medical claims clearinghouse since 2002. All the Medicare contractors before Wellpoint/NGS have been easy to work with and have been happy to accept the tens of thousand of electronic claims I sent to them each year. Wellpoint/NGS has nearly destroyed my business with their illegal practices.

My company name is Software4healthcare, Inc, and I also do business as Paton Data Co. I operated under Paton Data Co. as a proprietorship until 2010 when I incorporated.

Thank you for your consideration.  
Irving Paton, Director  
19 Peaslee Rd.  
Merrimack, NH 03054

Attachment: 2 page summary letter on Wellpoint antitrust complaint, dated July 4, 2014  
Web site link: [www.StopNgsNow.com](http://www.StopNgsNow.com)