



**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION**

\_\_\_\_\_  
In the Matter of )  
 )  
INTEL CORPORATION, )  
 )  
Respondent. )  
\_\_\_\_\_ )

**Docket No. 9341**

**PUBLIC**

**COMPLAINT COUNSEL'S FIRST SET OF REQUESTS FOR ADMISSION (1-23)**

Pursuant to Rule 3.32 of the Federal Trade Commission's Rules of Practice, Complaint Counsel hereby requests that Respondent Intel admit the truth of the following statements or opinions of fact within 10 days from the date of service thereof.

1. Admit that Intel's worldwide unit share of microprocessors used in desktop, notebook, and server computers has exceeded 65% in each and every year since 1999.
2. Admit that Intel's worldwide unit share of microprocessors used in servers has exceeded 80% since 2001.
3. Admit that Intel's worldwide unit share of microprocessors used in desktop computers has exceeded 70% since 1999.
4. Admit that Intel's worldwide unit share of microprocessors used in notebook computers has exceeded 80% since 1999.
5. Admit that Intel's worldwide unit share of microprocessors used in commercial desktops has exceeded 90% since 1999.
6. Admit that Intel's worldwide unit share of microprocessors used in commercial notebooks has exceeded 90% since 1999.
7. Admit that Intel was the sole supplier of microprocessors used in desktops, notebooks, and servers to Dell Computer between 1990 and 2005.
8. Admit that Intel did not submit pricing data to the United States Bureau of Labor Statistics for any year between 1999 and 2008.
9. Admit that Intel did not submit pricing data to the United States Bureau of Labor Statistics for each year between 1999 and 2009.

10. Admit that Intel collaborated with Nvidia to develop graphics chipsets that were compatible with Intel's microprocessors used in desktop, notebooks, or servers prior to 2006.
11. Admit that Intel shared its microprocessor roadmaps with Nvidia between 2004 and 2008.
12. Admit that Intel views Nvidia as a potential competitor in the market for microprocessors used in netbooks, notebooks, desktops, or servers.
13. Admit that Dell was the only OEM Intel indemnified for potential patent liability from Intergraph.
14. Admit that Intel has referred to its integrated graphics on chipsets as GPUs.
15. Admit that Nvidia sells GPUs that can perform some of the same functions as Intel's CPUs.
16. Admit that Intel contributes money to the Association for Competitive Technology ("ACT").
17. Admit that for any Intel microprocessor sku purchased by Dell, Dell's net unit price was equal to or lower than that of any other purchaser in 2003, 2004, and 2005.
18. Admit that Intel gave Dell more rebate dollars than any other OEM in 2003, 2004, and 2005.
19. Admit that in January 2003, Acer and Intel reached an agreement whereby Intel would be the sole supplier of microprocessors used in Acer desktops and notebooks.
20. Admit that in June 2001, Toshiba and Intel reached an agreement whereby Intel would be the sole supplier of microprocessors used in Toshiba desktops and notebooks.
21. Admit that Intel was the sole supplier to Toshiba of microprocessors used in desktops and notebooks between 2002 and 2005.
22. Admit that in 2002, NEC and Intel reached an agreement whereby NEC would purchase 80% of the microprocessors it needed for its desktop and notebook computers from Intel.
23. Admit that Hewlett Packard did not receive rebates on its purchases of commercial desktop microprocessors in September and October 2002.

**CERTIFICATION**

Pursuant to 28 U.S.C. § 1746, I hereby certify under penalty of perjury that this response to the Requests for Admission has been prepared by me or under my personal supervision from records of Intel Corporation, and is complete and correct to the best of my knowledge and belief.

\_\_\_\_\_  
(Signature of Official)

\_\_\_\_\_  
(Title/Company)

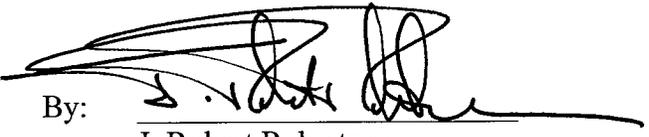
\_\_\_\_\_  
(Typed Name of Above Official)

\_\_\_\_\_  
(Office Telephone)

Respectfully submitted,

February 17, 2010

By:



J. Robert Robertson  
Federal Trade Commission  
Bureau of Competition

**CERTIFICATE OF SERVICE**

I certify that I filed via hand and electronic mail delivery an original and two copies of the foregoing Complaint Counsel's First Set of Requests for Admissions (1-23) with:

Donald S. Clark  
Secretary  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm. H-159  
Washington, DC 20580

I also certify that I delivered via electronic and hand delivery a copy of the foregoing Complaint Counsel's First Set of Requests for Admissions (1-23) to:

The Honorable D. Michael Chappell  
Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm. H-113  
Washington, DC 20580

I also certify that I delivered via electronic mail a copy of the foregoing Complaint Counsel's First Set of Requests for Admissions (1-23) to:

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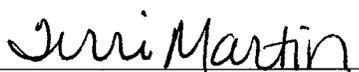
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*Counsel for Defendant  
Intel Corporation*

February 17, 2010

By:

  
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Federal Trade Commission  
Bureau of Competition