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The Silent Majority Fallacy of the Elzinga-Hogarty Criteria: A Critique and New Approach to Analyzing Hospital Mergers

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Abstract

Elzinga/Hogarty inflow/outflow analysis is a mainstay of geographic market definition in antitrust analysis. For example, U.S. antitrust agencies lost several hospital merger challenges when evidence showed that a nontrivial fraction of local patients traveled outside the local community for care. We show that the existence of traveling consumers may not limit seller market power with respect to non-traveling consumers--a phenomenon we label the *silent majority fallacy*. We estimate a random coefficients logit model of hospital demand and use the estimates to predict the increase in price that various mergers would generate. Two distinct methods of predicting the price increase are implemented and both indicate that even in suburban areas with high outflows of consumers, some hospital mergers could lead to significant price increases.

The Silent Majority Fallacy of the Elzinga-Hogarty Criteria:

A Critique and New Approach to Analyzing Hospital Mergers

1. Introduction

All merger analyses for spatially differentiated goods and services require geographic market definition. Elzinga and Hogarty (1973) (hereafter labeled "E/H") developed the default standard used by the courts to define geographic markets. The E/H approach uses aggregate inflows and outflows of consumers (or imports and exports of goods) to determine market boundaries. Geographic market boundaries are expanded until both flows are below a cutoff level, usually ten percent of total sales. Because the E/H approach is simple to apply, it has become important in practice.

There is a potential error in relying on consumer outflows to justify mergers between providers of goods and services. The E/H approach draws a conclusion about the entire market from the behavior of those consumers who express displeasure with their local sellers by traveling elsewhere. This is a valid logical leap when travelers and non-travelers have similar demands and related market experiences. However, if the two groups differ on dimensions other than location, then E/H gives rise to what we call the "silent majority fallacy." That is, if travelers and non-travelers display fundamentally different demand behavior, either because they differ in their taste for travel or their need for local/non-local services, then there is no necessary relationship between the market experiences of these two groups post-merger. If travelers differ significantly from non-travelers, then the presence of a minority of travelers does not imply that local firms lack market power *vis-à-vis* the majority of consumers who are non-travelers.

The silent majority fallacy may be especially worrisome in those sectors of the economy in which (a) there have been numerous mergers in “local markets,” and (b) the goods and services involved are

highly differentiated on both location and other dimensions. Hospitals are an important example. Since 1990, there have been over 750 mergers between hospitals. Many of these involved hospitals in the same cities or metropolitan areas, often necessitating review by the Department of Justice (DOJ) or Federal Trade Commission (FTC). The antitrust agencies challenged at least ten in court, and in each case, geographic market definition hinged on E/H analysis. In three recent examples, merging hospitals in Long Island, Missouri, and Iowa offered E/H-style patient flow data showing that many local patients travel for care. The hospitals argued that their relevant geographic markets were therefore large. In each case, the courts accepted the hospitals' arguments. The case in Poplar Bluffs, Missouri illustrates the thinking of many courts. An eighth circuit appellate court cited evidence that over 20 percent of Poplar Bluff residents received care from hospitals outside the community. The court concluded that the residents of Poplar Bluffs view these outside hospitals as good substitutes for their local hospitals, despite the fact that the hospitals were 45 miles away or more.[1]

The E/H approach has been persuasive in hospital merger cases because aggregate flows are often the only information pertaining to geographic markets presented to the courts. Thus, the courts have no way to test for the presence of the silent majority fallacy. To be sure, testing is an empirical issue that depends on the market examined and the extent of data available. In this study, we present the type of detailed data and evidence that courts often lack and demonstrate the potential flaws in E/H analysis.

Specifically, we examine very detailed information about hospital choice by patients in San Diego County. Several features make San Diego a clean setting for testing the reliability of E/H. The metropolitan area is large enough to support many hospitals, but it is isolated from other metropolitan areas. Thus, we need only examine patient choices amongst San Diego hospitals. It is more competitive

[1] The hospitals prevailed in all cases. In the Poplar Bluff case, the court ruled that it was "absurd" to define the market in a geographically narrow way. It included a Sikeston, Mo. hospital, which is located 48.7 miles away (FTC v. Tenet Health, 1999). Cape Girardeau, 83 miles away, was also cited as a competitor to Poplar Bluff. hospital(s).

than some of the markets involved in recent court cases, but it also contains a number of suburban hospitals in quasi-isolated locations. This is important because many insurers are concerned about the market power that might result from hospital mergers in these settings. All potential mergers in this market would be acceptable using E/H methods because patient outflows from each suburban area that we consider are generally high, often exceeding 30%. In other words, the setting is stacked to favor E/H.

San Diego is not exceptional. There are substantial patient flows from the suburbs of most metropolitan areas. As a check on our methods, we also consider a recently consummated merger in the Chicago metropolitan area for which we have less detailed patient information, but do have some information about pre and post-merger pricing.

Our principal finding is that demand behavior is consistent with the silent majority fallacy. There is overwhelming evidence of geographically distinct and locally isolated demand. The majority of patients are truly reluctant to travel and do not view distant hospitals as close substitutes for most services, even though a sizable percentage of their neighbors may travel for care. Those who do travel have distinct reasons for doing so and the fact that they travel would not inhibit merging local hospitals from increasing prices substantially.[2] Our findings suggest that E/H permits many mergers that, in fact, may lessen competition because E/H points towards a much broader scope of geographic competition than is truly present.

To assess local market competition, we estimate a logit model of individual patient choice. We use the estimated parameters of each patient's utility function to simulate how patients would respond to mergers. We obtain similar results from two distinct simulations. In the first, we draw on our model of logit demand to evaluate directly the pre- and post-merger price elasticities faced by merging hospitals. In the second, we define the "time-elasticity" of demand as the sensitivity of a hospital's market share to

[2] Tay (2000) identifies two discrete groups of heart attack patients and those who do not. Although we do not

changes in the distance to that hospital and show that, when neighboring hospitals merge, the time elasticity of demand facing the merged entity shrinks substantially. We then use these time elasticity estimates to infer the effects of mergers on price elasticities, and thus on hospital pricing in a simplified market structure. As we describe below, both simulations estimate the effects of mergers on prices without direct knowledge of the levels of price elasticities. This is critical, because of the poor quality of available hospital price data.

In both cases, we simulate behavior as if patients are not restricted by managed care organizations (MCOs) when they select their hospitals. This is consistent with the E/H approach, which assumes that individual patients are the key decision makers whose demands determine price. However, we recognize that the true organization of supply is decidedly more complicated than we assume, as it involves networks of hospitals banding together in MCOs. A companion paper that is under preparation builds on work by Vistes and Town (2000), we explicitly model pricing to MCOs. We find that the same factors that generate market power when patients select hospitals also generate market power when MCOs do. However, the exact magnitudes of price changes due to mergers may differ. The companion paper identifies reasons for these differences.

Previous Literature

Our analysis reinforces a small and growing literature critiquing the use of aggregate flow data in merger analysis. For example, FTC economist Gregory Werden (1992) argues that E/H analysis may understate market size if goods are homogeneous and travel costs are minimal.[3] In contrast, Dranove and White (1998) argue that E/H may overstate market size for heterogeneous goods markets. They point out that much of the travel for heterogeneous services occurs for idiosyncratic reasons. Thus, local sellers can

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identify such discrete groups, we do identify a continuum of willingness to travel.

[3] In a series of papers, Werden and several different coauthors have explored a number of alternatives to E/H. For example, Froeb, Tardiff and Werden (1994) use a logit demand framework to estimate elasticities of demand for long-

face inelastic demand even though many local buyers travel elsewhere for service.

Baker and Bresnahan (1986) estimate residual demand curves to test for market power in differentiated products markets. However, this approach involves identifying the price elasticity facing the hypothetical merged firm using instrumental variables regression techniques. This requires detailed data on firm-specific prices and quantities, as well as exogenous firm-specific cost or demand shifters. Economists have used residual demand curve methods to study competition in several markets, including beer (Baker and Bresnahan 1986), linerboard paper exports (Goldberg and Knetter, 1999), and the long distance market after divestiture (Kahai, Kaserman, and Mayo, 1996). However, Dranove and White point out that it may be difficult to estimate residual demand curves for hospitals. First, it is difficult to get actual transaction prices for hospitals. It is also difficult to find factors that uniquely shift costs and demand at individual hospitals. Most cost and demand shifters are related to global factors such as technological change. Tay (2000) uses a framework similar to ours to analyze the demand for treatment of acute myocardial infarction and finds that 14% of patients are insensitive to travel time, though this result is attributed to being away from home at the onset of the heart attack.

Werden and Froeb (1996) caution that using pre-merger prices can overestimate the price effects of a merger when demand elasticity is not constant. This point is directly related to the curvature of the demand curve, an issue is addressed in depth in Froeb and Tschants (2000). However, in one instance we observe both pre- and post-merger prices and find that both of our techniques slightly underestimated the price effects of that merger. Overall, the existing literature leads to skepticism about the use of E/H, but it still begs for an empirical analysis. No researcher has yet compared E/H with detailed patient data, nor tested for the presence of the silent majority fallacy. We do so here.

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distance carriers in Japan, and use these estimates to simulate the effects of a merger.

2. Model

The basis for estimation is a random utility model in which the indirect utility of a patient i who visits hospital j is

$$(1) \qquad U_{ij} = \alpha H_j^c + H_j^{'} \Gamma X_i + \tau_1 T_{ij} + \tau_2 T_{ij} X_i + \tau_3 T_{ij} H_j^c + \gamma_y Y_i - \gamma_p P_{ij} + \varepsilon_{ij},$$

where $H_j = [H_j^c, S_j]$ is a vector of hospital characteristics. The variables in H_j^c are characteristics that are identical across all patient conditions, such as teaching status. The variables in S_j are illness-specific service offerings, such as whether a hospital has a delivery room. This structure implies that a particular hospital service only benefits patients whose diagnosis is related to that service. For instance, if patient i is admitted for a delivery then the corresponding element in H is an indicator of the presence of a delivery room at hospital H.[4] Many elements of Γ, namely those corresponding to irrelevant service-diagnosis pairs, are constrained to be zero. For example, this restriction implies that cardiac patients, in choosing their hospital, do not consider whether a hospital has a delivery room. The vector X_i includes both socioeconomic and clinical characteristics of patient i, Y_i and P_{ij} are i's income and the price paid by i at hospital j, and T_{jk} is the approximate travel time from the patient's residence zip code to the hospital. (When we estimate the model, P_{ij} is effectively identical across all hospitals and so is excluded.) The parameters are the unconditional marginal values of hospital attributes (α), patient-specific values of hospital characteristics (the $K_H x K_X$ matrix Γ), and travel costs (τ). The hospital offerings appear in utility only via their interaction with patient characteristics, X_i.

In this setting, individual i will select hospital j if $\forall k \neq j$,

$$(2) \qquad \alpha\left(H_j^c - H_k^c\right) + \left(H_j - H_k\right)^{'} \Gamma X_i + \tau_1\left(T_{ij} - T_{ik}\right) + \tau_2\left(T_{ij} - T_{ik}\right) X_i + \tau_3\left(T_{ij} H_j^c - T_{ik} H_k^c\right) + \gamma_p\left(P_j - P_i\right) < \varepsilon_{ik} - \varepsilon_{ij}$$

We assume that the ε are distributed i.i.d. with the double exponential distribution, yielding the standard

logit demand formula for the probability that patient i chooses hospital j:

$$(3) \qquad p_{ij} = \frac{\exp\left(\alpha H_j^c + H_j' \Gamma X_i + \tau_1 T_{ij} + \tau_2 T_{ij} X_i + \tau_3 T_{ij} H_j^c - \gamma P_j\right)}{\sum_{k=1}^{J} \exp\left(\alpha H_k^c + H_k' \Gamma X_i + \tau_1 T_{ik} + \tau_2 T_{ik} X_i + \tau_3 T_{ik} H_k^c - \gamma P_k\right)}.$$

A major advantage of this specification is that the interaction of patient and hospital characteristics permits flexible substitution patterns across hospitals. As one hospital becomes less attractive (say, because its travel time increases), its patients may make very different decisions. Depending on their illness, income, location, and other characteristics, some may remain, others may go to another nearby hospital, while others may prefer to travel further for care. This flexibility allows us to more precisely estimate the demand facing each hospital, and more precisely identify competitors.[5]

3. The Data

The primary data are a cross-section of San Diego area patients and hospitals, taken from the California Office of Statewide Health Planning and Development (OSHPD) 1991 Patient Discharge Report and Financial Disclosure Report. Under the broadest definition, there are twenty-five acute care hospitals in the San Diego Area. We omit three of these: two are extremely small, serving less than 500 non-emergency patients in 1991, and the third is a Kaiser hospital. Pragmatically, Kaiser was eliminated because it only reports a subset of the data reported by other hospitals. Additionally, non-Kaiser patients do not generally go to Kaiser hospitals. Patients elect to have access to Kaiser hospitals at the time they select their health plan; hence, the selection of Kaiser depends on many factors besides the quality and location of the Kaiser hospital.

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[4] Surprisingly, only 13 hospitals in the sample have a dedicated delivery room.

[5] One concern about logit demand models is the specification of the outside option. There is no clearly defined outside option in this case as we do not observe patients who do not receive treatment (and nearly every San Diego resident receives treatment from a San Diego hospital.) Thus the model implicitly assumes that there is a captive market of patients who must go to one of the hospitals.

There were 50,393 non-emergency admissions to one of the remaining twenty-two hospitals in 1991. We retained those for which the insurer was listed as Medicare, Medicaid, Blue Cross or Blue Shield (BCBS), fee-for-service (FFS), or an HMO. In our main analysis, we only consider patients insured by Medicare, BCBS, or FFS. We excluded worker's compensation patients, who may have highly idiosyncratic preferences. We also excluded the uninsured, who may be unable to obtain treatment at their most preferred hospital. These steps reduce the data set to 46,145 patients. Next, to facilitate computation, we selected a 60% random sample of patients for each hospital, leaving 27,631 patients.[6]

Table 1 lists the 22 San Diego hospitals, dummies indicating for profit status, teaching status, and whether transplant services are offered. Table 1 also contains each hospital's average revenue, computed as gross inpatient revenue per patient net of contractual discounts, and average variable costs, computed as the per patient total cost of daily hospital services. Table 2 contains summary statistics for the hospitals used in the analysis. *Profit* and *Teach* are dummy variables indicating whether the hospital is privately owned and whether it is a teaching hospital, respectively. *Nursing intensity* equals nursing hours converted to annual full time equivalent nurses, divided by patient days in 1990.[7] *Equipment Intensity* is the dollar value of equipment, divided by patient days in 1990. The remaining variables are dummies indicating whether a hospital offers the listed service.

** TABLES 1 AND 2 ABOUT HERE**

Descriptive statistics for San Diego patients are in Table 3. *Male*, *white* and *elderly* indicate the patient's gender, race, and whether the patient is over age 60. *Income* is taken from the 1990 census and is matched to patient by zip code and by race, for the racial categories white, black, and other. Severity is notoriously difficult to measure, but we employ three indicators of severity. The first two are the *number*

[6] The difficulty lies not with the number of patients, but the number of choices. Given the choice between arbitrarily defining the market by eliminating hospitals and losing power due to fewer observations, we chose the latter.

[7] We use 1990 patient days to avoid endogeneity bias.

of other procedures and the *number of other diagnoses*, both of which are truncated at four. The third measure of severity, *pcttravel*, is to our knowledge, new to health services research. To compute pcttravel, we began with the universe of patients living in rural counties that have hospitals. We then computed, by diagnosis related group (DRG), the percent of patients who leave their county of residence to receive treatment. Presumably, patients are more likely to bypass their local hospital when their condition is severe and/or the required treatment is complex.

Lastly, we computed *timeij* and *distanceij*. These are the travel time and distance, respectively, from patient i's home zip code centroid to hospital j's street address. This is obviously more appropriate than zip code centroid to zip code centroid distance measures used in other studies. We obtained *timeij* and *distanceij* by using the "driving directions calculator" on the Mapquest.com web page. This feature accounts for actual driving conditions, and considers turns, stop lights, and freeway travel. We prefer to use travel time rather than distance to capture the value of a hospital with a convenient location.

** TABLE 3 ABOUT HERE **

By restricting our analysis to Medicare and indemnity insurance patients, we obviate the need to include price in the multinomial choice regression.8 The vast majority of these patients pay essentially the same out-of-pocket price regardless of which hospital they select. Medicare patients pay a fixed deductible. Many indemnity patients make either no copayment or a copayment based on a predetermined fee schedule. We cannot completely rule out the possibility that price affects decision making, however. Medicare inpatients may have to return for outpatient care, for which out-of-pocket expenses may vary by provider. Some indemnity patients may have to make a small copayment that is based on a percentage of the hospital's charges.

Unfortunately, it is impossible to determine patient out-of-pocket expenses. We tried hospital

8 On the other hand, managed care patients are constrained to visit the hospitals in their insurers' networks. Inclusion in networks may be

charges, as a proxy. We compute each hospitals average charge by DRG, and take this as the measure of the prices faced by a patient choosing among several hospitals. We acknowledge that the variation in charges is at best a noisy reflection of the variation in out-of-pocket expenses, and that the variation in charges may be correlated with variations in unmeasured quality. We offer our findings as evidence of robustness of our key results, rather than as evidence of the effect of charges on demand..

We also use confidential 1998-1999 data from an Illinois insurer to conduct a similar analysis of a recent merger between hospitals in Chicago's northern suburbs. This second data set has the advantage that we observe the actual out-of-pocket expense to each patient, but the drawback is that we only observe this particular insurer's patients. Compared to the OSHPD data, the Illinois data contain less detailed information about patient demographics and about hospital characteristics. Nevertheless, the results from these data are broadly consistent with the San Diego results. In particular, even when out-of-pocket expense is observed and included in the regressions, it has an insignificant coefficient.

4. Estimation and Results

All results are based on maximizing the log-likelihood function defined by the probabilities in equation (3). Coefficients tables are rather lengthy and are presented in Appendix 2. While the magnitudes of the coefficients are not readily interpretable, most are precisely estimated and have plausible signs.[9] Overall, the model does fairly well at predicting the actual choices of the patients: 35 percent of all patients went to the hospital to which the model assigns the highest probability, and 75 percent went to a hospital with one of the highest five predicted probabilities (Table 4). Because most patients are reasonably close to several hospitals, the highest probability hospital generally has a

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critically determined by price.

[9] The Pseudo R^2 is 0.30 in most specifications, but this is not directly comparable to the R^2 in least squares regressions. Instead, it measure the percent increase in the value of the likelihood under the unrestricted model relative to

probability well below 50 percent. Thus, the most common outcome involves the patient not going to the hospital with the highest probability.

** TABLE 4 ABOUT HERE **

A particularly strong result across all estimations is the negative and significant coefficient on *travel time*, -.665 for Medicare Patients and -.543 for all patients. This implies that the average patient is highly averse to travel. Some types of patients are more willing to travel than others, particularly wealthier patients and patients with more severe conditions are less averse to travel. For example, based on the full model results a person with values of income and *pcttravel* both one standard deviation above the mean would have an effective disutility per unit of travel of -.137, as compared to the unconditional effect of -.543. The results are similar across all specifications of the model.

The omission of price may bias the results if high quality hospitals are pricing out their quality: For example, if high quality hospitals charge more and patients pay an amount that increases with the hospital's charge, then omitting price will overstate the intrinsic aversion to travel. That is, patients avoid particular hospitals due to their price, not distance *per se*. However, this does not appear to be the case. In specifications restricted to Medicare patients, who have a fixed copayment, the magnitude of the travel coefficient is actually greater (-.66 vs. -.54). By comparison, for FFS patients only, the coefficient is roughly unchanged, -.51. Finally if the model is estimated for all patients with price (charges) included, the time coefficient is -.65 while the coefficient on price is close to zero.[10] This latter result provides some confirmation of our hypothesis that patients are relatively unconstrained by price.

The coefficients on hospital characteristics must be interpreted carefully because, depending on

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the model in which all coefficients are zero.

[10] In fact, the coefficient on price (measured in $1000's) is small, positive and significant, consistent with quality being priced out. Interestingly, if the listed charges for each patient are used as the price the coefficient is negative, but is again very close to zero. Additionally, if a dummy indicating the largest hospitals (above 3000 non-emergency admissions) is included, the price coefficient is also small and negative. In this case, the dummy may be capturing some of the unmeasured quality of the large hospitals. The time coefficient remains quite similar in each of these estimations.

interactions with patient traits and the distribution thereof, a characteristic with a negative coefficient may exert a positive net effect on a hospital's market share. For example, the coefficients on both nursing intensity and equipment intensity are negative.[11] Nevertheless increasing nursing hours per patient day or equipment per patient day would increase the market shares for the majority of hospitals in our sample. Table 5 shows the effects of changing a single hospital's attributes while holding the characteristics of all other hospitals constant.[12] For the continuous variables, nursing and equipment, the share changes are the predicted changes resulting from an increase of 1/2 standard deviation of the variable. For the dummy variables, teaching, transplants and for-profit status, the share change columns indicate the results of switching zeroes to ones and vice-versa. Table 6 gives raw and patient-weighted averages of each of these changes as well as sign counts. These effects vary significantly across hospitals, but on average, switching to a teaching hospital, changing status to nonprofit, or offering heart transplants[13] all increase a hospital's market share. Although the average effects of both nursing and equipment levels are negative, more hospitals would benefit from increasing either of these than would not.

** TABLES 5 AND 6 ABOUT HERE **

The high degree of heterogeneity in the taste for hospital attributes and in willingness to travel highlights the key point that hospitals offer a differentiated product to a segmented market. In turn, this implies the potential for significant market power with respect to possibly large subsets of the entire market.

5. Estimating Merger Effects

[11] In Table A1 (appendix), the coefficient on equipment is insignificant. However, it is significant at the 5% level in both the HMO only and Medicare only regressions.

[12] These are computed by averaging over the empirical distribution of patient characterstics: $\hat{s}_j = \sum_i^N \hat{p}_{ij}$,

As emphasized throughout the paper, hospitals offer sets of differentiated products to a highly segmented set of consumers. Patients are distinguished by clinical characteristics, demographics, and by their choice of payer. This section analyzes merger effects in the specific setting of market segmentation, in which hospitals must choose optimal prices for a wide variety of services to patients with differing types of insurance. Profit maximizing hospitals must build into these prices information on the distribution of patient characteristics that affect demand elasticity, but over which hospitals cannot price discriminate.

We offer two distinct and complementary approaches to estimating price effects. The first, which we call the *Competitor Share Approach*, derives pre- and post-merger expressions for the firm's pricing decision; however, the specific form for these expressions depends critically on the assumption that the error term in the patient utility function follows the logit distribution. The second, which we call the *Time Elasticity Approach*, derives an expression for the ratio of price elasticities of demand pre- and post-merger; however, this approach makes the simplification that the effect of time on patient utility is independent of patient characteristics. In spite of their dramatically different methods, both approaches generate strikingly similar predictions about post-merger prices.

The Competitor Share Approach

In this approach, a patient is defined by a vector of characteristics, $X=(X_i^S,X_i^C,\lambda_i)$, where X^S denotes service and insurance related characteristics over which hospitals can price discriminate, X^C denotes other patient characteristics for which hospitals can not vary price, and λ_i denotes patient i's location. Let $f(X_i^S,X_i^C,\lambda_i)$ denote the joint distribution of these characteristics. Then the pricing problem

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where $\hat{p}$ is computed using the estimated coefficients in equation (3).

[13] Offering transplant services is the defining characteristic of a tertiary care hospital.

facing the hospital is to determine a set of prices, $P(X^S)$, conditional on the distribution of (X^C,λ) given X^S. As a benchmark, note that if hospitals could price discriminate over all elements of X, then the solution to the pricing problem is fairly straightforward: simply apply the inverse elasticity rule to each patient type. In the Logit framework developed in section III, the price elasticity of demand of a patient of type X is just $\varepsilon_j(X^C,\lambda,P(X^S)) = \delta_p P_j(X^S)\left[1-s_j(.)\right]$, where $s_j(X^C,\lambda,P(X^S))$ is hospital j's market share of patients of type (X_i^S,X_i^C,λ_i). The objective is to find an equation analogous to this one that is both consistent with the nature of the pricing problem and estimable from the data.

We assume that hospitals set a different price for each insurer-DRG pair, for each class of insurance for which price is unregulated (Medicare, MediCal, BCBS, FFS, HMO) and each of the 490 DRGs.14 Thus, the set $\{X^S\}=\{1,2,...,1957\}$ contains all 1,957 DRG-payer combinations observed in our San Diego Data. All other patient characteristics are elements of $\{(X^C,\lambda)\}$. Thus, conditional on the prices all hospitals set for service-insure X^S, hospital j's aggregate market share of those patients is

$$(4) \qquad S_j(X^S,P(X^S)) = \int_{X^C,\lambda} s_j(X,\lambda,P(X^S))f(X^C,\lambda \mid X^S)dX^C d\lambda .$$

This presents the problem that the conditional distribution, $f(X^C,\lambda|X^S)$, is not readily estimable. While we could in principle choose a functional form for this distribution and estimate its parameters, we instead convert the problem to a discrete one and use the empirical distribution.

To simplify notation, define the mapping $Z(X^C,\lambda)$==>$\mathbf{Z}\subset\mathbf{N}$, and let N^Z denote the number of elements in Z.[15] N^Z is intractably large; referring back to Table 3, there are eight patient characteristics over which hospitals can not price discriminate, some of which are dummies while others take on over one hundred distinct values. Fortunately, we avoid using it altogether. To see this, rewrite the previous

[14] Currently, Medicare prices are set by the federal government, and would not change if hospitals merged. However, we examine Medicare "prices" to illustrate what would happen if Medicare prices were determined in the market.

market share equation as

$$(5) \qquad S_j(X^S, P(X^S)) = \sum_{z=1}^{N^Z} s_j(z, X^S, P(X^S)) f(z \mid X^S).$$

The conditional distribution can be consistently estimated by (See Appendix 1).

$$(6) \qquad f(Z \mid X^S) = \frac{1}{N^S} \sum_{i \in S}^{N^S} 1[Z(X_i^C, \lambda_i) = z],$$

where the set $S=\{i:X_i^S=X^S\}$, 1[.] is the indicator function, and N^S is the number of patients in the set *S*. Substituting (6) into (5) gives

$$(7) \qquad S_j(X^S, P(X^S)) = \sum_{z=1}^{N^Z} \left\{ s_j(z, X^S, P(X^S)) \frac{1}{N^S} \sum_{i \in S}^{N^S} 1[Z(X_i^C, \lambda_i) = z] \right\}$$

In taking the sum from 1 to N^Z, only those z's present in *S* are counted; in other words, at most N^S distinct z's will have non-zero shares $s_j(z, X^S, P(X^S))$. Thus we can obtain a tractable version of the aggregate market share equation:

$$(8) \qquad S_j(X^S, P(X^S)) = \frac{1}{N^S} \sum_{i=1}^{N^S} s_j(Z_i, X_i^S, P(X^S)),$$

which works because each Z_i is counted exactly as many times as it appears in *S*, as indicated in equation (7).

Based on this share equation, the aggregate market elasticity is

$$(9) \quad e_j(X^S, P(X^S)) = \frac{P_j(X^S)}{S_j(X^S, X^S)} \frac{1}{N^S} \sum_{i=1}^{N^S} \delta_P s_j(Z_i, X_i^S, P(X^S))[1 - s_j(Z_i, X_i^S, P(X^S))],$$

with the sample analog being

[15] Alternatively, Z is just $\{X^C\}X\{\lambda\}$, and X^S is {DRG}X{Payer}.

$$(10)\quad e_j(X^S, P(X^S)) = \delta_P P_j(X^S) \frac{\sum_{i=1}^{N^S} \hat{s}_{ij}[1-\hat{s}_{ij}]}{\sum_{i=1}^{N^S} \hat{s}_{ij}},$$

where $\hat{s}_{ij}$ is simply the predicted probability that patient i chooses hospital j, computed from the same choice model used to obtain the time-elasticity results. There is one such elasticity for each hospital-X^S combination. These elasticities allow us to compute post-merger prices.

Let (j+k) subscripts denote the post-merger values. Then if hospital j and k merge, their combined market share is

$$(11)\quad S_{j+k}(X^S, P(X^S)) = \frac{1}{N^S}\sum_{i=1}^{N^S} s_j(Z_i, X_i^S, P(X^S)) + \frac{1}{N^S}\sum_{i=1}^{N^S} s_k(Z_i, X_i^S, P(X^S)),$$

with the corresponding market share derivative.[16]

$$\begin{aligned}
&\frac{\partial}{\partial P_{J+K}} S_{j+k}(X^S, P(X^S)) = \delta_P \frac{1}{N^S}\sum_{i=1}^{N^S} [s_{ij}(.) + s_{ik}(.)][1 - s_{ij}(.) - s_{ik}(.)] \\
(12)\quad &= \delta_P \frac{1}{N^S}\sum_{i=1}^{N^S} \left\{ s_{ij}(.)[1 - s_{ij}(.)] + s_{ik}(.)[1 - s_{ik}(.)] - 2 s_{ij}(.) s_{ik}(.) \right\}, \\
&s_{ij}(.) = s_j(Z_i, X_i^S, P(X^S)).
\end{aligned}$$

The terms inside the sum in the second line has an intuitive interpretation: it is the sum of each hospital's own price elasticity when acting alone minus a $2s_{ij}s_{ik}$ term, which is largest when both hospitals have a significant share of patients of type i. When the average is taken, this indicates that when two hospitals have many patients in common (geographically, diagnostically, or demographically speaking) a merger will lead to a larger reduction in the market share elasticity and thus larger increases in margins.

The corresponding market elasticity is

[16] Note that this assumes the hospitals equalize their post-merger prices.

$$(13) \qquad e_{j+k} = \delta_P \frac{P_{j+k}(X^S)}{S_{j+k}(X^S, P(X^S))} \frac{1}{N^S} \sum_{i=1}^{N^S} [s_{ij}(.) + s_{ik}(.)][1 - s_{ij}(.) - s_{ik}(.)] .$$

Thus for each merging hospital, we can construct the ratio of pre and post merger elasti cities:

$$(14) \qquad \frac{e_j(X^S, P(X^S))}{e_{j+k}(X^S, P(X^S))} = \frac{\frac{P_j(X^S)}{S_j(X^S, X^S)} \frac{1}{N^S} \sum_{i=1}^{N^S} \delta_P s_j(.)[1 - s_j(.)]}{\frac{P_{j+k}(X^S)}{S_{j+k}(X^S, P(X^S))} \frac{1}{N^S} \sum_{i=1}^{N^S} \delta_P \left\{ s_{ij}(.)[1 - s_{ij}(.)] + s_{ik}(.)[1 - s_{ik}(.)] - 2 s_{ij}(.) s_{ik}(.) \right\}},$$

which, after replacing shares with there sample analogs, reduces to

$$(15) \qquad \frac{\hat{e}_j(X^S, P(X^S))}{\hat{e}_{j+k}(X^S, P(X^S))} = \left\{ \frac{\sum_{i=1}^{N^S} \hat{s}_{ij}[1 - \hat{s}_{ij}]}{\sum_{i=1}^{N^S} \hat{s}_{ij}} \bullet \frac{\sum_{i=1}^{N^S} (\hat{s}_{ij} + \hat{s}_{ik})}{\sum_{i=1}^{N^S} [\hat{s}_{ij} + \hat{s}_{ik}][1 - \hat{s}_{ij} - \hat{s}_{ik}]} \right\} \frac{P_j(X^S)}{P_{j+k}(X^S)} .$$

The important feature of equation (15) is that the δ_P term, which we cannot estimate, is cancelled. Thus, the changes in margins stemming from a merger are proportional to the reduction in elasticity the hospitals face when acting together: $p_{j+k}(X^S) = MC + K(p_j(X^S) - MC)$, where K denotes the term in braces in equation (15). Note that this formulation presumes that the hospitals equalize their price after the merger, a condition we relax in the upcoming section. A second caveat is that we are evaluating hypothetical post-merger shares using pre-merger prices.[17] While K can be derived without reference to cost, any evaluation of the price changes requires knowing the marginal cost of each service a hospital offers, which we clearly do not observe. This is an issue for the courts.

We illustrate how to use our methods by considering a hypothetical merger between the two

[17] Given demand estimates and a value of marginal costs, it is possible in principle to explicitly solve for the post-merger equilibrium prices and also allow asymmetry. However this requires inverting a 22 dimensional nonlinear system of equations for each DRG-payer combination, which is not computationally feasible. These results are based on evaluating the first order conditions of only the hypothetically merging hospitals; this will understate the price effects if

hospitals in Chula Vista, California: Community Hospital of Chula Vista (CHCV) and Scripps Memorial Hospital of Chula Vista (SCV).[18] (The map at the end of the paper shows the locations of these and other hospitals we study.) Chula Vista is a suburb of San Diego, located approximately ten miles south of downtown. Additionally, Paradise Valley Hospital (PVH) is located in between Chula Vista and San Diego and would be a leading beneficiary of any price increases in Chula Vista. Accordingly, we also consider mergers involving this hospital. Table 7 shows that 40% of the residents of Chula Vista travel elsewhere, primarily San Diego proper, for care. Thus, an analysis based on traditional Elzinga/Hogarty patient flows would not deem a merger between any two of these hospitals anti-competitive.

** TABLE 7 ABOUT HERE **

An advantage of this technique is that it presents a wide range of margin changes, by payer type and by DRG. This advantage comes at a cost—it is difficult to distill 2000 prices per hospital into a tractable table. Table 8 gives the margin ratios, averaged over DRGs within each payer type. Mergers between the two hospitals in Chula Vista proper have the greatest effect, around 10% for both hospitals. A merger of either Chula Vista hospital with PVH yields the asymmetric pricing result that PVH, located in between Chula Vista and San Diego, garners a lesser reduction in its demand elasticity from these potential mergers.

There is no obvious expectation for how margins should change with respect to specific payers, but from a policy perspective these results are cause for some concern. The most significant price effects are consistently found for Medicare, Medi-Cal (Medicaid), and HMO payer types. Mergers not accompanied by significant cost-savings could lead to a significant increase in government health care expenditures, in addition to the already high overall rate of increase

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hospital services are strategic complements.

[18] During the period we study, these hospitals belonged to different hospital systems. For illustrative purposes, we treat them as independent hospitals.

** TABLE 8 ABOUT HERE **

The important mediating role of service overlap is highlighted in table 9. Diseases of the Nervous System are relatively rare, and the treatments are more specialized. Thus, these patients represent a segment of the Chula Vista market that frequently receive treatment in San Diego; a Chula Vista merger would not have as large an effect for these patients. For Diseases of the Circulatory System, comprised largely of non-acute cardiac procedures, the effects are larger--precisely because CHCV and SCV compete in this service. The outflows of neurological patients is irrelevant to the increased pricing power a merged CHCV and SCV would have with respect to this market segment.

Pregnancy and Childbirth services are particularly interesting. It is apparent from table 9 that PVH and SCV are strong rivals in labor and delivery, and both compete closely with CHCV in this service line. For this reason, neither PVH nor SCV would be able to dramatically raise price in a merger with CHCV, while the price increase for delivery services would be dramatic if PVH did merger with SCV.

The Time Elasticities Approach

The *Antitrust Guidelines* set forth by the FTC and DOJ do not direct lawyers to consider elasticities of demand with respect to travel time. Instead, it guides analyses to focus on price. However, if we make a few simplifying assumptions about patient utility, we discover that time elasticities are indicative of the potential effect of a merger on price. We can then easily show how mergers affect time elasticities, the implied effect on price elasticities, and thus the implied effect on price. While this approach requires an important simplifying assumption, it yields results that are strikingly similar to those presented above, is computationally simpler, and hones in on the very travel issues underlying E/H.

The following lemma shows the relationship between time and price elasticities (see Appendix 2

for proof):

Lemma: Consider a group of individuals who must travel time t to reach provider j. Let η_j^p denote provider j's price elasticity of demand from this group. Let η_j^t denote provider j's time elasticity of demand from this group. Assume that each individual i belonging to this group who visits provider j receives utility $U_{ij} = \beta_0 - \beta_1 t - \beta_2 P_j + e_i$, where P_j is the price charged by provider j and e_i is an idiosyncratic symmetric noise term distributed $F(e_i)$.[19] Then $\eta_j^p = K_j \eta_j^t$, where $K_j = \frac{P_j}{t}\frac{\beta_2}{\beta_1}$. That is, there is a direct proportionality between a hospital's time and price elasticities. This proportionality allows us to estimate the ratio of pre and post-merger Lerner indices by examining the ratio of pre- and post-merger time elasticities of demand.

Two caveats apply to the lemma. First, the lemma assumes a simple utility function that should be thought of as a first order approximation to a more complex functional form. This assumption is demonstrably false but not demonstrably harmful, inasmuch as the results are very similar to those obtained via the more structural approach.[20] Second, we estimate the time elasticities of demand for the patients whose insurance insulates them from differences in prices.[21] We must assume that their preferences are comparable to those for the remaining patients that we do not study.

We use the coefficients from equation (1) to estimate own-travel time elasticities of demand facing individual hospitals. We predict each hospital's market share if the travel time to that hospital increases by ten percent for every patient. We compare this with the predicted market shares using actual

[19]Note that in this specification, the marginal utility of time is independent of price, and therefore independent of income. Although we find empirical evidence that this is not true, our data span considerable differences in wealth. The price changes that we are considering are quite small, on the other hand (especially once one accounts for insurance), so that it is reasonable to suppose that the marginal utility of income remains constant for any given individual.

[20] Moreover, for the one merger where we have obtained actual pricing, our results underpredict the actual price increase. We discuss this further below.

[21] Most of the patients we study are covered by Medicare, and did not have a choice of other insurers. Hence, the

travel times to compute the travel time elasticity. We then repeat this analysis using pairs of hospitals that have hypothetically merged. That is, we increase all patients' travel times to both hospitals by ten percent. If the two hospitals are close substitutes and face no other close substitutes, then the demand elasticity from this experiment should be much smaller in magnitude than that facing only one hospital in the pair. We perform this in the aggregate for all patients, and then again for subgroups of patients based on insurance status and clinical condition. We then use estimates of travel time elasticities to predict the effects of mergers on prices.

Time-elasticities for a given hospital are estimated by increasing, for all patients, the travel times to that hospital, while holding travel times to all other hospitals at their true levels. The estimated elasticity is just the percent change in quantity divided by the percent change in travel time and therefore depends in general on the size of the travel time change used. Table 10 presents the isolated and joint elasticities based on 10% increases in travel time.[22] We simulate the effects of a merger by increasing two or more hospitals' travel times simultaneously. The difference between the elasticities faced under unilateral versus multilateral time increases maps directly into the change in (P-MC) that would occur if the two hospitals merge.

** TABLE 10 ABOUT HERE **

The first step is computing the own travel time elasticity of demand facing each hospital if it "raises" travel time unilaterally. CHCV's predicted market share using actual patient travel times is 2.16 percent. Its predicted market share if all patients had to travel 10 percent farther to get to CHCV is 1.81 percent, implying a unilateral time elasticity of demand for CHCV of -1.62. Not surprisingly, the largest gainer if CHCV raises travel times is SCV. The second largest gainer is PVH, which is the next closest

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fact that they are insulated from price does not reveal anything about their preferences.

[22] Results are largely insensitive to whether we instead use a 5% or 25% change in travel time to compute elasticities.

hospital to both CHCV and SCV. This suggests that SCV is the closest competitor to CHCV, and that PVH also provides some competition. Similarly, if SCV unilaterally "raises" its time price by 10 percent, then its share falls from 2.94% to 2.5%. This implies that the time elasticity of demand facing SCV is -1.5. If SCV "raises" time price, CHCV and PVH enjoy the largest market share gains, increases of 1.16% and 2.13% respectively.

If, however, both CHCV and SCV jointly "raise" travel times by 10 percent, then their shares fall to 1.85% and 2.54% respectively. This implies that the time elasticities of demand facing CHCV and SCV when both hospitals raise time prices in lockstep are -1.43 and -1.35 respectively. These elasticities are each smaller in magnitude than the corresponding unilateral elasticities by about 11 percent. We also computed the elasticity changes if PVH were included in the merger and we raised its time by 10 percent. In this case, the time elasticities facing the merged entity would be about twenty percent smaller than the individual elasticities. We conclude that a merger between CHCV and SCV would reduce the own price elasticities of demand by about 11 percent, and a three way combination that included PVH would reduce elasticities by about 20 percent. We will use these figures to compute the expected price changes from a merger.

The time elasticity approach is similar to the competitor share approach in that it estimates changes in margins from changes in elasticities, but it does so for only a single price. Letting η^t_{pre} and η^t_{post} denote pre- and post-merger time elasticities and $\frac{\eta^t_{pre}}{\eta^t_{post}} = K$, then $p^{merged} = MC + K(p^{pre} - MC)$. Clearly, $K \geq 1$ and it is unlikely that price is below marginal cost. Thus, a merger that leaves costs unchanged will necessarily increase price in direct proportion to the reduction in time-elasticities. The previous equation demonstrates that the post-merger price is falling in marginal cost. Assuming that average variable cost is above marginal cost due to excess capacity, our calculations

conservatively estimate the price increases. Table 11 shows the changes in markups for mergers among the Chula Vista hospitals. The percent changes in price in the bottom right of Table 11 are at best very rough approximations, as they use the Average Revenue and Average Cost data (from Table 2) in the place of price and marginal cost.

These results highlight the importance of distance in mediating the degree of market power. If PVH, the hospital between San Diego and Chula Vista, merges with either of the satellite hospitals, it could not profitably increase its price by more than 5%. However, PVH's partner in either such merger would raise its price between 4.8% and 8.9%. A PVH merger would only be anti-competitive if both Chula Vista hospitals joined in a three-way merger. In this case, PVH would increase price by about 7% and the two hospitals in Chula Vista proper by 10.9% (CHCV) and 10.2% (SCV). Note that these price increases are very similar to those predicted using the competitor share approach.

All mergers involving SCV and a nearby hospital result in SCV increasing price by more than 5%, while the results for CHCV range from 4% to 7% increases. Recall that in the absence of direct evidence on demand, the E/H "10% safety zone" is used as a proxy. Chula Vista has a 30% outflow rate, yet our results indicate that mergers among these hospitals, all located less than thirteen miles from downtown San Diego, would likely result in substantial price increases.

We can use similar methods to simulate the effects of any merger. Table 12 shows results for six other potential mergers. These results are also consistent with the notion of localized competition between hospitals. The first merger, shown in column (1) of table 12 is between San Miguel Hospital and Mercy Hospital. While these hospitals are not far from each other and have more pricing power acting jointly than when acting alone, their power is clearly restricted by the presence of nearby hospitals. Whereas the mergers involving SCV and CHCV were found to facilitate increases in margins of between 9% and 15%, a San Miguel/Mercy merger would allow margin increases between 5% and 6%. Interestingly, while

Mercy is much larger than San Miguel Hospital (5,730 non-emergency patients vs. 422), there is no noticeably asymmetry in their time-elasticities in either the pre- or post-merger scenarios.

A second suburban merger that we consider, shown in column (2), shows an increase in joint pricing power that is consistent with the results for Chula Vista hospitals. Like SCV and CHCV, HCA and Scripps-La Jolla are two miles from each other but 7 and 9 miles respectively from the nearest hospital in San Diego proper. Also like CHCV and SCV there is one hospital, Mission Bay Memorial Hospital, roughly half way in between the merging pair and downtown. In this instance, the post-merger markup of price over marginal cost increases by approximately 9%. The effect in this case is somewhat smaller than for Chula Vista, possibly due to another geographical factor: Tijuana lies directly beyond Chula Vista so that those hospitals essentially face only one-sided competition. The La Jolla hospitals also face some competition from two hospitals located roughly 10 miles north of the La Jolla pair. Additionally, La Jolla is somewhat closer to downtown San Diego than is Chula Vista.

We also consider two possible mergers that should have no effect, based on our hypothesis of localized competition. Column (3) shows a merger between two suburban hospitals located on opposite sides of the downtown medical complex. Column (6) shows a merger between the extreme northern and southern hospitals. In the former case, the effect on margins is between 2.8% and 3.5% while in the latter there is essentially no predicted effect on price. An intermediate case is shown in column (5), that of a merger between a downtown hospital and a suburban hospital. In this case the effect is clearly asymmetric: while the suburban hospital would be able to increase margins by over 6.7% in the event of a merger, there is apparently no benefit for the downtown hospital, which faces multiple nearby competitors.

** TABLE 12 ABOUT HERE **

To further the comparison between the two methods, Table 13 shows the average predicted price

effects for the same six mergers, computed using the competitor share approach. For the first three mergers considered, the results are quite similar. For the last three mergers (columns 5-6), the results appear quite different at first glance. However, the competitor share approach computes the post-merger price under the assumption that the two hospitals equalize their prices while the time-elasticity approach does not. Thus a finding that one hospital's price goes up after a merger and the other hospital's goes down under the competitor share approach is conceptually similar to the finding, under the time-elasticity approach, that neither hospital raises price.

** TABLE 13 ABOUT HERE **

Chicago-North Shore Results

We obtained confidential 1998-1999 discharge data from a private insurer in Illinois. This information is combined with 1997 AHA hospital data and used to re-estimate the model and simulate the effects of a recently consummated merger between the only two hospitals in Waukegan, Illinois.[23] The Waukegan market exhibits substantial patient outflows; thus recent court rulings suggest that any effort to block this merger would have failed. Our analysis again indicates that this may be flawed reasoning.

The two hospitals currently serving Waukegan are Victory Memorial and Provena-St. Therese. A third hospital, Midwest Regional Medical Center (MRMC), is located between Waukegan and Evanston. MRMC is primarily an oncology hospital, although it is classified by the AHA as a short term general hospital and was therefore not omitted from the analysis. Both Victory and St. Therese offer oncology services, but these are clearly not a majority of their services, thus MRMC is likely not a competitor to Victory and St. Therese, although the converse may be true.

The predicted price effects of Waukegan merger, shown in Table 9, are even larger than the

[23] Waukegan is located 30 miles north of Chicago.

predicted effects in the San Diego market. If there are no cost savings from the merger then prices are predicted to increase by 10%. Turning this calculation around, a 14% reduction in marginal cost would be required to hold Provena's price increase after a merger with Victory down to 5%.[24] The same calculation for a Victory a merger with Provena indicates a required decrease in marginal cost of 10%. To maintain post merger prices at their original levels would require reductions in marginal cost of 24.7% (Provena) and 19% (Victory). While such cost savings are not implausible, they should not be presumed by the courts. In fact, after merging, the two Waukegan hospitals successfully negotiated substantial price increases (greater than 15 percent) with at least one major health insurer.

As a plausibility check, note that the MRMC results are in line with expectations. Neither Victory nor St. Therese would gain significant pricing power in a merger with MRMC. Two factors cause this. First, MRMC's services only slightly overlap those of the other two hospitals. While Victory and St. Therese do provide oncology services, these are very small relative to their other services. Second, in a merger of Provena and MRMC, Victory is still a close substitute for Provena, and similarly for a possible merger of Victory and MRMC. Either hospital's prices for oncology services would likely rise after a merger with MRMC, but the figures in the table show a weighted average of price changes across the entire spectrum of services, indicating a small overall effect. However, in either of these mergers, MRMC would potentially be able to increase its price significantly because both Victory and St. Therese offer many of the services that MRMC offers (basic oncology).

As a final check of the plausibility of our model, note that one implication of our model, which is estimated using 1991 data, is that there should have been hospital mergers in San Diego after 1991—some mergers would generate pricing power, and the direction of court rulings was indicating that such mergers would not be successfully opposed. Indeed this did occur. At the end of 1991, Scripps purchased HCA's

[24] This is obtained by setting Pnew=1.05Pold, MCnew=αMCold, and solving for α.

La Jolla hospital, giving it an effective monopoly in the La Jolla area. Scripps also purchased another hospital in 1993 and again in 1995. The San Diego Hospital Association purchased Grossmont hospital in 1992 and then Coronado hospital in 1993. Thus there was indeed increasing consolidation in San Diego in the 1990s, but unfortunately our data do not allow us to directly estimate the price effects of these mergers.

VI. Implications and Conclusions

The 1980's and 1990's witnessed an array of hospital mergers, likely spurred by the introduction of prospective payment and furthered by the expansion of managed care. These mergers are generally justified by reference to efficiency gains in the form of reduced overhead, less excess capacity, and reduced incentives for hospitals to over-compete on quality dimensions. These are all potentially valid reasons for a merger, and are recognized in the *Antitrust Guidelines* set forth by the Federal Trade Commission and the Department of Justice. However, these benefits must also be balanced against the costs borne by patients and third party payers when they must purchase health care in more concentrated markets.

Throughout the 1990's, merging hospitals prevailed against the government when mergers were challenged. The courts generally relied on a simple logic in allowing these mergers to proceed. In markets with significant outflows--roughly 20% or more--the courts presumed that merged hospitals would lack the ability to raise prices more than trivially. Thus, a merger would still not harm patients.

Our results indicate that this reasoning is flawed, as it falls victim to the silent majority fallacy. The majority of patients demonstrate a marked aversion to travel while a distinct minority do not. Moreover, the propensity of the minority to travel pre-merger is not a good predictor of the propensity of the majority to travel post-merger. This implies that, in allowing mergers to proceed, the courts relied

upon overly broad market definitions. For example, two hospitals located in a suburb only twelve miles from downtown San Diego are found likely to profitably increase prices between five and nine percent after a merger. Both the time elasticity and competitor share models support this finding. This figure jumps to 18 percent if a third hospital, lying midway between the two outlying hospitals and downtown San Diego, is included in the merger. This latter case more closely resembles mergers contested in the courts, in which all neighboring competitors were permitted to merge.

Methodologically, we provide both a structural approach and a reduced form approach to predicting the price effects of a merger. Both allow us to make inferences on pricing sensitivity, which we can not directly observe, by using utility parameters to derive changes in demand elasticity under a joint pricing regime *vis-a-vis* unilateral pricing. When patients are reluctant to travel, it creates more localized markets, reducing the price-elasticity of demand faced by any single hospital. Due to the lack of accurate price and cost data on the hospitals we study, our actual estimates of price increases are only a best guess. In actual court proceedings, the requisite cost data could be obtained as part of the discovery process, allowing for precise estimates of the likely price effects of a particular merger.

Future work should examine more closely the connection between managed care, mergers, and pricing. Mergers that are primarily a strategic response to increased penetration of managed care are less likely to be justified on efficiency grounds. Recent work by Vistnes and Town (2000) highlights the importance of bargaining power between hospitals and HMO's in determining price: when a particular hospital's withdrawal from an HMO network would significantly reduce the value of that network, the hospital is able to negotiate a higher price. While most of our analysis excludes managed care patients, we believe the results extend readily to managed care. We find that merged hospitals face significantly less elastic demand and are accordingly able to increase price even when there are multiple hospitals within twenty miles. Similarly, two hospitals within an HMO's network would, if they merged, be in a stronger

bargaining position. A threat by two merged hospitals to leave an HMO network would carry more weight because it implies a greater increase in average travel times for the patients of the HMO than either hospital acting alone could impose. In a companion paper that is under preparation, we find that the same factors that generate market power when patients select hospitals also generate market power with respect to Managed Care Organizations, although the exact magnitudes of price changes due to mergers may differ. Thus, assuming that HMO patients are similar to other patients in terms of aversion to travel, the price implications of a merger for managed care patients should be close to the results we obtain herein.

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Appendix 1: Proofs of Lemmas

Lemma 1: Consider a group of individuals who must travel time t to reach provider j. Let η_j^p denote provider j's price elasticity of demand from this group. Let η_j^t denote provider j's time elasticity of demand from this group. Suppose that each individual i belonging to this group who visits provider j receives utility $U_{ij} = \beta_0 - \beta_1 t - \beta_2 P_j + e_{ij}$, where P_j is the price charged by provider j and e_{ij} is an idiosyncratic symmetric noise term distributed $F(e_i)$.[25] Then $\eta_j^p = K_j \eta_j^t$, where $K_j = \frac{P_j}{t}\frac{\beta_2}{\beta_1}$.

Proof of Lemma 1: We omit the terms not involving P_j or t for compactness. Moreover because we are considering patients traveling the same distance, the interactions of X_i and t are irrelevant to the probability that i chooses hospital j. Because the utility function is additive in time and price, it follows that

(A1) $\partial U_{ij}/\partial t = R \cdot \partial U_{ij}/\partial P_j$,

where $R = \beta_2/\beta_1$ is a constant and represents the dollar value of time.

Individual i selects provider j if $U_{ij} > U_{ik} \quad \forall k \neq j$. Let U^{max} denote the highest level of utility over the set $\{U_{ik}: k \neq j\}$. Then the probability that i selects j is $1\text{-}F(U^{max} - \overline{U}_j)$, or

(A2) $P_{ij} = 1 - F(U^{max} - \beta_0 + \beta_1 t + \beta_2 P_j - e_{ij})$

Thus, the expected number of individuals who will select provider j is:

(A3) $E(Q_j) = \sum_{i=1}^{N} \left[1 - F(U^{max} - \beta_0 + \beta_1 t + \beta_2 P_j)\right]$

Differentiating (4) with respect to t and P, respectively, yields:

(A4) $\frac{\partial EQ_j}{\partial t} = -\sum_{i=1}^{N} f(U^{max} - \beta_0 + \beta_1 t + \beta_2 P_j - e_{ij})\,\beta_1$, and

(A5) $$\begin{aligned}\frac{\partial EQ_j}{\partial P_j} &= -\sum_{i=1}^{N} f(U^{max} - \beta_0 + \beta_1 t + \beta_2 P_j - e_{ij})\,\beta_2 \\ &= -\sum_{i=1}^{N} f(U^{max} - \beta_0 + \beta_1 t + \beta_2 P_j - e_{ij})\,\beta_1 \Big/ R \\ &= \frac{1}{R}\frac{\partial EQ_j}{\partial t}.\end{aligned}$$

Direct application of (A4) and (A5) and the definitions of each elasticity gives the result:

(A6) $\eta_j^p = \frac{P_j}{t}\frac{1}{R}\eta_j^t$. ∃

[25]Note that in this specification, the marginal utility of time is independent of price, and therefore independent of income. Although we find empirical evidence that this is not true, our data span considerable differences in wealth. The price changes that we are considering are quite small, on the other hand (especially once one accounts for insurance), so that it is reasonable to suppose that the marginal utility of income remains constant for any given individual. The empirical connection between income and travel distance may be the result of income proxying for unmeasured factors, such as education.

It follows from this lemma that the price and time elasticities of demand (faced by hospital j) are proportional, where the proportion is determined by the price, the travel time, and the dollar value of time.

Lemma 2: $f(Z \mid X^S) = \frac{1}{N^S} \sum_{i \in S}^{N^S} 1[Z(X_i^C, \lambda_i) = z]$.

Proof of Lemma 2: A consistent estimate of the conditional distribution is

(A7) $$f(Z \mid X^S) = \frac{f(Z\, I\, X^S)}{f(X^S)} = \frac{\sum_{i=1}^{N} 1[Z(X_i^C, \lambda_i) = Z] 1[X_i^S = X^S]}{\sum_{i=1}^{N} 1[X_i^S = X^S)},$$

where the 1/N terms cancel (N is the total number of patients in the sample). $1[X_i^S = X^S]$ occurs in exactly N^S cases, so define the set *S* as $\{i: X_i^S = X^S\}$ and let N^S be the number of terms in *S*. Then we can rewrite $f(Z|X^S)$ as $f(Z \mid X^S) = \frac{1}{N^S} \sum_{i \in S}^{N^S} 1[Z(X_i^C, \lambda_i) = Z]$. ∃

Appendix 2: Coefficient Tables

Table A1: Full Model Results (All Patients)

Conditional (fixed-effects) logistic regression Number of obs = 601942

LR chi2(88) = 49697.80

Prob > chi2 = 0.0000

Log likelihood = -59725.115 Pseudo R2 = 0.2938

Variable	choice	Coef.	Std.Err.	z	P>z	[95% Conf.	Interval]
profit	o_prof	-0.6039	0.5901	-1.0230	0.3060	-1.7604	0.5526
teaching	teach	1.3869	0.5310	2.6120	0.0090	0.3461	2.4277
transplants	s_trans	0.3665	0.0162	22.5830	0.0000	0.3347	0.3983
eqp/pat. day, $1000's	ints_eqp	-2.8974	2.3813	-1.2170	0.2240	-7.5646	1.7698
nurs hrs/pat. day	ints_nrs	-0.5284	0.1792	-2.9490	0.0030	-0.8796	-0.1772
time	timeij	-0.5434	0.0306	-17.7630	0.0000	-0.6034	-0.4835
time*o_profit	hint1	-0.0052	0.0019	-2.7060	0.0070	-0.0089	-0.0014
time*teach	hint2	0.0214	0.0020	10.7790	0.0000	0.0175	0.0253
time*ints_nrs	hint4	0.0054	0.0006	8.3120	0.0000	0.0041	0.0066
time*ints_eqp	hint5	0.1144	0.0078	14.6190	0.0000	0.0991	0.1297
time*male	pint0	0.0024	0.0016	1.4830	0.1380	-0.0008	0.0056
time*age_eld	pint1	-0.0259	0.0025	-10.5100	0.0000	-0.0308	-0.0211
time*rwhite	pint2	-0.0162	0.0033	-4.9550	0.0000	-0.0226	-0.0098
time*lincome	pint3	0.0332	0.0032	10.2270	0.0000	0.0268	0.0395
time*explos	pint4	0.0000	0.0001	0.5190	0.6040	-0.0001	0.0002
time*pcttrvi	pint5	0.2501	0.0145	17.2070	0.0000	0.2216	0.2786
time*oprocs	pint6	0.0000	0.0007	-0.0240	0.9810	-0.0013	0.0013
time*odiags	pint7	-0.0033	0.0006	-5.4540	0.0000	-0.0045	-0.0021
time*py_mcare	pint8	-0.0090	0.0027	-3.3700	0.0010	-0.0142	-0.0038
time*py_ffs	pint9	-0.0071	0.0025	-2.8120	0.0050	-0.0120	-0.0021
time*py_bcbs	pint10	-0.0099	0.0042	-2.3380	0.0190	-0.0182	-0.0016
time * py_mcal	pint11	-0.0200	0.0031	-6.4670	0.0000	-0.0260	-0.0139
male*o_profit	hpint0a	-0.0267	0.0364	-0.7320	0.4640	-0.0980	0.0447
male*teach	hpint0b	0.2278	0.0346	6.5840	0.0000	0.1600	0.2956
male*ints_nrs	hpint0d	0.0221	0.0117	1.8860	0.0590	-0.0009	0.0451
male*ints_eqp	hpint0e	0.2073	0.1540	1.3470	0.1780	-0.0945	0.5091
age_eld*o_profit	hpint1a	0.9903	0.0510	19.4110	0.0000	0.8903	1.0903
age_eld*teach	hpint1b	0.0341	0.0484	0.7060	0.4800	-0.0607	0.1289
age_eld*ints_nrs	hpint1d	-0.2299	0.0169	-13.5770	0.0000	-0.2631	-0.1967
age_eld*ints_eqp	hpint1e	1.8070	0.2166	8.3420	0.0000	1.3824	2.2316
rwhite*o_profit	hpint2a	0.4264	0.0719	5.9340	0.0000	0.2856	0.5673
rwhite*teach	hpint2b	0.1488	0.0613	2.4260	0.0150	0.0286	0.2690
rwhite*ints_nrs	hpint2d	-0.1929	0.0202	-9.5380	0.0000	-0.2325	-0.1533
rwhite*ints_eqp	hpint2e	3.3865	0.2877	11.7720	0.0000	2.8227	3.9504
linc*o_profit	hpint3a	0.0527	0.0640	0.8230	0.4110	-0.0728	0.1782
linc*teach	hpint3b	-0.1766	0.0581	-3.0380	0.0020	-0.2906	-0.0627
linc*ints_nrs	hpint3d	0.0558	0.0196	2.8440	0.0040	0.0174	0.0943
linc*ints_eqp	hpint3e	-0.1905	0.2611	-0.7290	0.4660	-0.7022	0.3213
explos*o_profit	hpint4a	-0.0030	0.0038	-0.7710	0.4410	-0.0105	0.0046
explos*teach	hpint4b	-0.0137	0.0035	-3.9720	0.0000	-0.0205	-0.0070
explos*ints_nrs	hpint4d	-0.0082	0.0012	-6.9080	0.0000	-0.0106	-0.0059

explos*ints_eqp	hpint4e	0.0309	0.0119	2.6020	0.0090	0.0076	0.0542
pcttrvi*o_profit	hpint5a	-2.8573	0.3104	-9.2040	0.0000	-3.4657	-2.2488
pcttrvi*teach	hpint5b	0.5197	0.2920	1.7800	0.0750	-0.0526	1.0919
pcttrvi*ints_nrs	hpint5d	0.3894	0.0978	3.9800	0.0000	0.1976	0.5811
pcttrvi*ints_eqp	hpint5e	4.6490	1.2989	3.5790	0.0000	2.1031	7.1948
oprocs*o_profit	hpint6a	0.0567	0.0138	4.1210	0.0000	0.0298	0.0837
oprocs*teach	hpint6b	0.0759	0.0132	5.7390	0.0000	0.0500	0.1018
oprocs*ints_nrs	hpint6d	-0.0235	0.0045	-5.2360	0.0000	-0.0323	-0.0147
oprocs*ints_eqp	hpint6e	0.3839	0.0565	6.7990	0.0000	0.2733	0.4946
odiags*o_profit	hpint7a	0.1039	0.0136	7.6470	0.0000	0.0773	0.1305
odiags*teach	hpint7b	-0.0924	0.0127	-7.2520	0.0000	-0.1173	-0.0674
odiags*ints_nrs	hpint7d	0.0218	0.0039	5.5710	0.0000	0.0142	0.0295
odiags*ints_eqp	hpint7e	0.0655	0.0282	2.3250	0.0200	0.0103	0.1208
py_mcare*o_profit	hpint8a	-0.6788	0.0544	-12.4900	0.0000	-0.7854	-0.5723
py_mcare*teach	hpint8b	-0.0900	0.0530	-1.6990	0.0890	-0.1938	0.0138
py_mcare*ints_nrs	hpint8d	0.0520	0.0186	2.7890	0.0050	0.0155	0.0885
py_mcare*ints_eqp	hpint8e	0.1550	0.2204	0.7030	0.4820	-0.2770	0.5871
py_ffs*o_profit	hpint9a	0.3613	0.0570	6.3340	0.0000	0.2495	0.4731
py_ffs*teach	hpint9b	0.3298	0.0601	5.4880	0.0000	0.2120	0.4475
py_ffs*ints_nrs	hpint9d	0.0987	0.0199	4.9500	0.0000	0.0596	0.1377
py_ffs*ints_eqp	hpint9e	2.4572	0.2547	9.6490	0.0000	1.9581	2.9564
py_bcbs*o_profit	hpint10a	-0.0073	0.1250	-0.0580	0.9530	-0.2523	0.2377
py_bcbs*teach	hpint10b	-0.2232	0.1129	-1.9770	0.0480	-0.4446	-0.0019
py_bcbs*ints_nrs	hpint10d	-0.1783	0.0376	-4.7390	0.0000	-0.2520	-0.1045
py_mcal*o_profit	hpint11a	-1.1167	0.0836	-13.3500	0.0000	-1.2806	-0.9527
py_mcal*teach	hpint11b	0.4486	0.0563	7.9720	0.0000	0.3383	0.5588
py_mcal*ints_nrs	hpint11d	0.2125	0.0152	14.0170	0.0000	0.1828	0.2422
d_nerv*s_nuric	svint1	0.2944	0.0611	4.8230	0.0000	0.1748	0.4141
d_resp*s_pulic	svint2	0.2156	0.0958	2.2500	0.0240	0.0278	0.4034
d_cv*s_cclin	svint3	0.5763	0.0364	15.8200	0.0000	0.5049	0.6478
d_obst*s_deliv	svint4	5.8062	1.0013	5.7990	0.0000	3.8437	7.7686
d_dimg*s_img	svint5	0.5661	0.0483	11.7310	0.0000	0.4715	0.6607
d_psych*s_psyac	svint6	0.4516	0.0944	4.7840	0.0000	0.2666	0.6366
d_endocrine*time	IpXti_2	-0.0192	0.0096	-1.9930	0.0460	-0.0381	-0.0003
d_otolaryngology*time	IpXti_3	0.0085	0.0055	1.5500	0.1210	-0.0022	0.0192
d_respiratory*time	IpXti_4	0.0023	0.0056	0.4120	0.6800	-0.0087	0.0133
d_cardio*time	IpXti_5	0.0018	0.0038	0.4880	0.6260	-0.0055	0.0092
d_lymph*time	IpXti_6	-0.0019	0.0082	-0.2270	0.8200	-0.0180	0.0142
d_digest*time	IpXti_7	-0.0143	0.0041	-3.5100	0.0000	-0.0223	-0.0063
d_urinary*time	IpXti_8	-0.0065	0.0050	-1.3070	0.1910	-0.0163	0.0033
d_genital*time	IpXti_9	-0.0067	0.0041	-1.6390	0.1010	-0.0147	0.0013
d_obtertric*time	IpXti_10	0.0098	0.0074	1.3270	0.1840	-0.0047	0.0243
d_muscskel*time	IpXti_11	-0.0019	0.0038	-0.5050	0.6140	-0.0093	0.0055
d_integument*time	IpXti_12	-0.0011	0.0050	-0.2240	0.8230	-0.0108	0.0086
d_psychiatric*time	IpXti_13	-0.0044	0.0072	-0.6070	0.5440	-0.0185	0.0097
d_phystherapy*time	IpXti_14	0.0214	0.0058	3.6710	0.0000	0.0100	0.0328
d_other*time	IpXti_15	-0.0019	0.0039	-0.4940	0.6220	-0.0095	0.0057

Table A2: Medicare Patients Only							
Conditional (fixed-effects) logistic regression Number of obs = 263472							
LR chi2(69) = 25210.81							
Prob > chi2 = 0.0000							
Log likelihood = -24412.92 Pseudo R2 = 0.3405							
Variable	**choice**	**Coef.**	**Std.Err.**	**z**	**P>z**	**[95%Conf.**	**Interval]**
profit	o_prof	-0.6002	0.9021	-0.6650	0.5060	-2.3683	1.1680
teaching	teach	2.8676	0.8053	3.5610	0.0000	1.2892	4.4460
transplants	s_trans	0.6634	0.0260	25.5400	0.0000	0.6125	0.7143
eqp/pat. day, $1000's	ints_eqp	6.3344	3.6293	1.7450	0.0810	-0.7789	13.4478
nurs hrs/pat. day	ints_nrs	-1.6241	0.2968	-5.4720	0.0000	-2.2058	-1.0423
time	timeij	-0.6645	0.0461	-14.4140	0.0000	-0.7549	-0.5742
time*o_profit	hint1	0.0190	0.0031	6.2060	0.0000	0.0130	0.0250
time*teach	hint2	0.0197	0.0031	6.3910	0.0000	0.0136	0.0257
time*ints_nrs	hint4	-0.0013	0.0011	-1.1070	0.2680	-0.0035	0.0010
time*ints_eqp	hint5	0.1092	0.0119	9.1450	0.0000	0.0858	0.1326
time*male	pint0	0.0134	0.0025	5.2840	0.0000	0.0084	0.0183
time*age_eld	pint1	-0.0239	0.0051	-4.7300	0.0000	-0.0338	-0.0140
time*rwhite	pint2	0.0057	0.0061	0.9320	0.3510	-0.0063	0.0177
time*lincome	pint3	0.0440	0.0049	9.0560	0.0000	0.0345	0.0536
time*explos	pint4	0.0006	0.0002	3.0140	0.0030	0.0002	0.0010
time*pcttrvi	pint5	0.3121	0.0217	14.4060	0.0000	0.2697	0.3546
time*oprocs	pint6	-0.0031	0.0010	-3.1650	0.0020	-0.0049	-0.0012
time*odiags	pint7	-0.0070	0.0009	-7.5220	0.0000	-0.0088	-0.0052
male*o_profit	hpint0a	-0.1091	0.0563	-1.9390	0.0530	-0.2194	0.0012
male*teach	hpint0b	-0.0214	0.0533	-0.4010	0.6880	-0.1258	0.0831
male*ints_nrs	hpint0d	0.0245	0.0196	1.2510	0.2110	-0.0139	0.0628
male*ints_eqp	hpint0e	-0.5632	0.2335	-2.4120	0.0160	-1.0209	-0.1055
age_eld*o_profit	hpint1a	0.4905	0.1141	4.3010	0.0000	0.2670	0.7141
age_eld*teach	hpint1b	-0.4595	0.0873	-5.2610	0.0000	-0.6306	-0.2883
age_eld*ints_nrs	hpint1d	0.0028	0.0321	0.0880	0.9300	-0.0601	0.0657
age_eld*ints_eqp	hpint1e	1.7534	0.4508	3.8900	0.0000	0.8699	2.6369
rwhite*o_profit	hpint2a	0.4521	0.1247	3.6270	0.0000	0.2078	0.6965
rwhite*teach	hpint2b	0.2477	0.1034	2.3960	0.0170	0.0451	0.4503
rwhite*ints_nrs	hpint2d	-0.1869	0.0369	-5.0640	0.0000	-0.2592	-0.1145
rwhite*ints_eqp	hpint2e	2.6118	0.4954	5.2720	0.0000	1.6408	3.5828
linc*o_profit	hpint3a	0.0254	0.0986	0.2570	0.7970	-0.1679	0.2187
linc*teach	hpint3b	-0.2646	0.0890	-2.9750	0.0030	-0.4390	-0.0903
linc*ints_nrs	hpint3d	0.1454	0.0328	4.4300	0.0000	0.0811	0.2097
linc*ints_eqp	hpint3e	-0.8982	0.3993	-2.2490	0.0240	-1.6807	-0.1156
explos*o_profit	hpint4a	0.0022	0.0046	0.4690	0.6390	-0.0069	0.0112
explos*teach	hpint4b	-0.0334	0.0057	-5.8500	0.0000	-0.0445	-0.0222
explos*ints_nrs	hpint4d	-0.0059	0.0019	-3.1590	0.0020	-0.0095	-0.0022
explos*ints_eqp	hpint4e	-0.0147	0.0183	-0.8030	0.4220	-0.0506	0.0212
pcttrvi*o_profit	hpint5a	-3.9607	0.4833	-8.1950	0.0000	-4.9080	-3.0134
pcttrvi*teach	hpint5b	-0.6205	0.4460	-1.3910	0.1640	-1.4946	0.2536
pcttrvi*ints_nrs	hpint5d	0.6077	0.1604	3.7880	0.0000	0.2933	0.9222

pcttrvi*ints_eqp	hpint5e	1.0700	1.9528	0.5480	0.5840	-2.7573	4.8974
oprocs*o_profit	hpint6a	0.0668	0.0206	3.2450	0.0010	0.0265	0.1072
oprocs*teach	hpint6b	0.1481	0.0195	7.5800	0.0000	0.1098	0.1863
oprocs*ints_nrs	hpint6d	-0.0474	0.0072	-6.6260	0.0000	-0.0614	-0.0334
oprocs*ints_eqp	hpint6e	0.6877	0.0844	8.1460	0.0000	0.5222	0.8531
odiags*o_profit	hpint7a	0.0658	0.0223	2.9460	0.0030	0.0220	0.1096
odiags*teach	hpint7b	-0.0620	0.0203	-3.0480	0.0020	-0.1018	-0.0221
odiags*ints_nrs	hpint7d	0.0559	0.0067	8.3110	0.0000	0.0427	0.0690
odiags*ints_eqp	hpint7e	0.0267	0.0415	0.6420	0.5210	-0.0547	0.1081
d_nerv*s_nuric	svint1	0.7109	0.1158	6.1370	0.0000	0.4839	0.9380
d_resp*s_pulic	svint2	0.4653	0.1524	3.0540	0.0020	0.1667	0.7640
d_cv*s_cclin	svint3	0.5958	0.0531	11.2300	0.0000	0.4919	0.6998
d_dimg*s_img	svint5	0.9107	0.0711	12.8130	0.0000	0.7714	1.0500
d_psych*s_psyac	svint6	0.4950	0.1333	3.7130	0.0000	0.2337	0.7564
d_endocrine*time	lpXti_2	-0.0589	0.0277	-2.1250	0.0340	-0.1132	-0.0046
d_otolaryngology*time	lpXti_3	0.0226	0.0089	2.5350	0.0110	0.0051	0.0401
d_respiratory*time	lpXti_4	0.0129	0.0084	1.5320	0.1260	-0.0036	0.0295
d_cardio*time	lpXti_5	0.0126	0.0059	2.1250	0.0340	0.0010	0.0242
d_lymph*time	lpXti_6	0.0067	0.0122	0.5500	0.5830	-0.0172	0.0307
d_digest*time	lpXti_7	-0.0001	0.0067	-0.0140	0.9890	-0.0132	0.0130
d_urinary*time	lpXti_8	-0.0063	0.0079	-0.7910	0.4290	-0.0217	0.0092
d_genital*time	lpXti_9	0.0048	0.0068	0.7000	0.4840	-0.0086	0.0181
d_obtertric*time	lpXti_10	0.0808	0.0452	1.7850	0.0740	-0.0079	0.1694
d_muscskel*time	lpXti_11	0.0095	0.0062	1.5280	0.1270	-0.0027	0.0217
d_integument*time	lpXti_12	0.0022	0.0082	0.2720	0.7860	-0.0139	0.0184
d_psychiatric*time	lpXti_13	0.0044	0.0105	0.4220	0.6730	-0.0161	0.0250
d_phystherapy*time	lpXti_14	0.0094	0.0099	0.9510	0.3420	-0.0100	0.0287
d_other*time	lpXti_15	-0.0027	0.0066	-0.4090	0.6820	-0.0155	0.0102

Table 1: San Diego Hospitals	Profit	Teaching	Transplant	Non-Emergency Patients	Avg. Charge (Net of Adjustments)	Average Cost (DHS)
NME HOSPITALS,INC.	Y	N	N	2568	3452.25	1434.76
SCRIPPS MEMORIAL HOSPITAL – CHULA VISTA	N	N	N	1749	1714.70	727.74
HARBOR VIEW HEALTH PARTNERS	Y	N	N	2025	3064.49	1485.74
CHILDREN'S HOSPITAL - SAN DIEGO	N	Y	N	4069	5429.09	2589.78
CORONADO HOSPITAL, INC.	N	N	Y	664	2543.68	1328.10
SHARP CABRILLO HOSPITAL	N	N	N	1635	3170.59	1614.80
SHARP MEMORIAL HOSPITAL	N	N	Y	4611	2452.41	1183.64
FALLBROOK HOSPITAL DISTRICT	N	N	N	490	1157.93	681.63
GROSSMONT DISTRICT HOSPITAL	N	N	N	3876	2497.28	1187.11
SAN MIGUEL HOSPITAL ASSOCIATION	N	Y	N	422	4310.31	1573.53
MERCY HOSPITAL AND MEDICAL CENTER, SAN DIEGO	N	Y	N	5730	2810.97	1076.22
MISSION BAY MEMORIAL HOSPITAL	Y	N	N	991	2514.91	1845.61
PALOMAR POMERADO HEALTH SYSTEM, Escondido	N	N	N	3239	3038.71	1238.20
PARADISE VALLEY HOSPITAL	N	N	Y	1367	2308.95	1086.95
SCRIPPS MEMORIAL HOSPITAL - LA JOLLA	N	N	N	3334	2793.87	1569.60
TRI-CITY HOSPITAL DISTRICT	N	N	Y	3256	2121.46	1008.20
UCSD MEDICAL CENTER	N	Y	Y	3205	3904.88	1611.44
VILLA VIEW COMMUNITY HOSPITAL	N	N	N	595	4683.88	1665.34
COMMUNITY HOSPITAL OF CHULA VISTA	N	N	N	1659	3458.28	1905.96
PALOMAR POMERADO HEALTH SYSTEM, Poway	N	N	N	1473	2072.19	1103.91
HCA HOSPITAL SERVICES OF SAN DIEGO, INC.	Y	Y	Y	3412	3126.00	1681.14
SCRIPPS MEMORIAL HOSPITAL-ENCINITAS	N	N	N	935	3252.65	1516.35

Table 2: San Diego Hospitals (n=22)					
Name	**Description**	**Mean**	**Std. Dev.**	**Min**	**Max**
profit	For Profit	0.182	0.395	0.000	1
teach	Teaching	0.227	0.429	0.000	1
ints_nrs	FTE Nurses per Patient Day	5.582	1.420	3.503	9.096
ints_eqp	Equipment per Patient Day, $1000's	0.343	0.118	0.069	0.573
s_clin	Cardiac Clinic	0.182	0.395	0.000	1
s_med	Chest Medical Clinic	0.136	0.351	0.000	1
s_neoic	Neonatal Intensive Care	0.500	0.512	0.000	1
s_trans	Transplant Services	0.273	0.456	0.000	1
s_nuric	Neurological Intensive Care	0.364	0.492	0.000	1
s_ohs	Open Heart Surgery	0.455	0.510	0.000	1
s_cath	Cardiac Catheterization	0.500	0.512	0.000	1
s_pulmic	Pulmonary Intensive Care	0.727	0.456	0.000	1
s_nursgy	Neurosurgery	0.818	0.395	0.000	1
s_abc	Alternative Birthing Center	0.455	0.510	0.000	1
s_nnc	Newborn Nursery Care	0.591	0.503	0.000	1
s_pnc	Premature Nursery Care	0.591	0.503	0.000	1
s_sknrs	Skilled Nursing	0.455	0.510	0.000	1
s_ecg	Electroencephalography	0.818	0.395	0.000	1
s_emg	Electromyography	0.636	0.492	0.000	1
s_xray	X-Ray Therapy	0.455	0.510	0.000	1
s_radio	Radioisotope Therapy	0.545	0.510	0.000	1
s_cmt	Computed Tomography	0.864	0.351	0.000	1
s_mri	Magnetic Resonance Imaging	0.409	0.503	0.000	1
s_er	Emergency Room	0.818	0.395	0.000	1
s_pvl	Peripheral Vascular Lab	0.409	0.503	0.000	1
s_deliv	Labor/Delivery Room	0.591	0.503	0.000	1

Table 3: Patient Variables (N=50,393)					
Name	**Description**	**Mean**	**Std. Dev.**	**Min**	**Max**
male	Male	0.453	0.498	0.000	1.000
age_eld	Over 60	0.451	0.498	0.000	1.000
rwhite	White	0.761	0.426	0.000	1.000
income	Income, $1000's	15.90	62.260	0.000	32.930
explos	Expected Length of Stay	6.306	9.402	0.000	1695.00
pcttrvi	%Travel	0.235	0.060	0.128	0.581
oprocs	Other Procedures	1.249	1.409	0.000	4.000
odiags	Other Diagnoses	2.171	1.529	0.000	4.000
timeij	Travel Time	16.175	10.759	1.000	79.000
distij	Travel Distance (miles)	9.155	8.101	.200	61.100
py_mcar	Medicare	0.380	0.485	0.000	1.000
py_mcal	Medical	0.159	0.365	0.000	1.000
py_bcbs	Blue Cross/Blue Shield	0.025	0.156	0.000	1.000
py_ffs	Fee-For-Service	0.120	0.325	0.000	1.000
py_hmo	HMO/PPO	0.233	0.423	0.000	1.000

Table 4. Rank Order of Predicted Probabilities Assigned to Observed Choices			
Probability	**Frequency**	**Percent**	**Cum.**
1	9546	34.89	34.89
2	4290	15.68	50.57
3	2773	10.13	60.70
4	2076	7.59	68.29
5	1676	6.13	74.42
6	1467	5.36	79.78
7	1204	4.40	84.18
8	920	3.36	87.54
9	745	2.72	90.26
10	553	2.02	92.28
11	450	1.64	93.93
12	382	1.40	95.33
13	310	1.13	96.46
14	264	0.96	97.42
15	214	0.78	98.21
16	164	0.60	98.80
17	123	0.45	99.25
18	60	0.22	99.47
19	64	0.23	99.71
20	22	0.08	99.79
21	40	0.15	99.93
22	18	0.07	100.00

Table 5: Effects of Changing Hospital Characteristics, by Hospital

Changes in Shares Resulting from Changes in Hospital Variables	Non-Emerg. Patients	Market Share	Profit	Teach	Transp	Increase Nursing 1/2 s.d.	Increase Equip 1/2 s.d.	Change to Non-Profit	Change to Profit	Change to Teaching	Change to Non-Teaching	Add Transp.	Remove Transplant
NME HOSPITALS,INC.	2568	5.86%	1	0	0	-0.34%	1.45%	0.08%	--	1.41%	--	3.02%	--
SCRIPPS MEMORIAL HOSPITAL - CHULA VISTA	**1749**	**3.34%**	**0**	**0**	**0**	0.08%	0.22%	--	-0.86%	0.61%	--	0.16%	--
HARBOR VIEW HEALTH PARTNERS	2025	1.90%	1	0	0	0.06%	0.45%	0.62%	--	0.34%	--	0.79%	--
CHILDREN'S HOSPITAL - SAN DIEGO	4069	6.68%	0	1	0	1.39%	2.12%	--	-1.13%	--	-1.15%	3.21%	--
CORONADO HOSPITAL, INC.	664	1.11%	0	0	1	1.51%	1.84%	--	1.17%	2.08%	--	--	0.85%
SHARP CABRILLO HOSPITAL	1635	3.00%	0	0	0	0.20%	1.02%	--	0.50%	1.12%	--	2.04%	--
SHARP MEMORIAL HOSPITAL	4611	9.65%	0	0	1	-5.07%	-4.12%	--	-4.89%	-4.09%	--	--	-6.34%
FALLBROOK HOSPITAL DISTRICT	490	0.96%	0	0	0	1.54%	1.70%	--	1.45%	1.97%	--	2.03%	--
GROSSMONT DISTRICT HOSPITAL	3876	7.05%	0	0	0	-1.53%	-0.64%	--	-1.68%	-0.30%	--	0.31%	--
SAN MIGUEL HOSPITAL ASSOCIATION	422	0.79%	0	1	0	3.40%	4.20%	--	3.47%	--	2.96%	4.99%	--
MERCY HOSPITAL AND MEDICAL CENTER, SAN DIEGO	5730	12.09%	0	1	0	-5.94%	-5.16%	--	-6.66%	--	-7.22%	-3.84%	--
MISSION BAY MEMORIAL HOSPITAL	991	2.12%	1	0	0	-0.70%	-0.29%	-0.45%	--	-0.32%	--	0.22%	--
PALOMAR POMERADO HEALTH SYSTEM	3239	6.26%	0	0	0	-0.84%	-0.07%	--	-0.61%	0.07%	--	0.46%	--
PARADISE VALLEY HOSPITAL	**1367**	**2.45%**	**0**	**0**	**1**	2.71%	3.61%	--	2.21%	3.86%	--	--	1.71%
SCRIPPS MEMORIAL HOSPITAL - LA JOLLA	3334	6.35%	0	0	0	-1.59%	0.12%	--	-1.16%	1.04%	--	3.09%	--
TRI-CITY HOSPITAL DISTRICT	3256	6.66%	0	0	1	-0.82%	-0.03%	--	-0.89%	0.24%	--	--	-1.70%
UCSD MEDICAL CENTER	3205	6.01%	0	1	1	1.23%	2.26%	--	-0.70%	--	-0.86%	--	-0.83%
VILLA VIEW COMMUNITY HOSPITAL	595	1.23%	0	0	0	2.20%	2.88%	--	2.34%	2.87%	--	3.64%	--
COMMUNITY HOSPITAL OF CHULA VISTA	**1659**	**3.73%**	**0**	**0**	**0**	-1.56%	-1.24%	--	-1.65%	-1.05%	--	-0.96%	--
PALOMAR POMERADO HEALTH SYSTEM	1473	3.35%	0	0	0	1.32%	2.31%	--	1.97%	2.42%	--	3.50%	--
HCA HOSPITAL SERVICES OF SAN DIEGO, INC.	3412	7.57%	1	1	1	0.16%	2.97%	1.59%	--	--	-2.20%	--	-2.98%
SCRIPPS MEMORIAL HOSPITAL	935	1.84%	0	0	0	0.75%	1.32%	--	0.72%	1.92%	--	2.47%	--

Table 6: Average Share Changes			
	Patient Weighted	**Raw Average**	**# Increase**
Switch to For Profit	-1.78%	-0.36%	8/18
Switch to Non-Profit	0.71%	0.46%	3/4
Switch to Teaching	0.12%	0.83%	13/17
Switch to Non-Teaching	-3.27%	-1.69%	1/5
Start Offering Transplants	-2.71%	-1.55%	14/16
Stop Offering Transplants	0.82%	1.57%	2/6
Increase Nursing Intensity 1/2 Std. Dev.	-1.10%	-0.08%	13/22
Increase Equipment Intensity 1/2 Std. Dev	-0.11%	0.77%	15/22

Table 7: Chula Vista Patient Outflows			
Hospital Admissions from Chula Vista	**Freq.**	**Percent**	**Cum.**
CHILDREN'S HOSPITAL - SAN DIEGO	340	9.86	9.86
COMMUNITY HOSPITAL OF CHULA VISTA	**976**	**28.30**	**38.16**
HARBOR VIEW HEALTH PARTNERS	146	4.23	42.39
MERCY HOSPITAL AND MEDICAL CENTER, SAN DIEGO	284	8.23	50.62
PARADISE VALLEY HOSPITAL	**413**	**11.97**	**62.59**
SCRIPPS MEMORIAL HOSPITAL - CHULA VISTA	**971**	**28.15**	**90.74**
SHARP MEMORIAL HOSPITAL	185	5.36	96.10
UCSD MEDICAL CENTER	134	3.89	99.99
Total	3449	100.00	

Table 8: Average K=(P-MC)^{New}/(P-MC)^{Old} by Merger and Payer Type, Competitor Share Approach

Merger	Hospital	Payer						K from Time-Elasticity Approach	
		Medi-care	Medi-Cal	BCBS	FFS	HMO	Over all	%Δt=10	%Δt=25
CHCV and Scripps	CHCV	1.114	1.144	1.077	1.042	1.111	1.100	1.133	1.092
	Scripps	1.164	1.065	1.115	1.035	1.110	1.096	1.111	1.127
		Medi-care	Medi-Cal	BCBS	FFS	HMO	Over all		
Scripps and Paradise	Scripps	1.139	1.133	1.062	1.068	1.105	1.105	1.154	1.138
	Paradise	1.092	1.132	1.060	1.039	1.097	1.086	1.069	1.056
		Medi-care	Medi-Cal	BCBS	FFS	HMO	Over all		
CHCV and Paradise	CHCV	1.111	1.123	1.064	1.065	1.093	1.094	1.157	1.108
	Paradise	1.108	1.044	1.096	1.029	1.082	1.069	1.054	1.056

Table 9: Average $K=(P\text{-}MC)^{New}/(P\text{-}MC)^{Old}$ by Merger and Major Diagnostic Category						
Merger	Hospital	Diseases of the Nervous System (01)	Diseases of the Circulatory System (05)	Diseases of the Skin, Subcutaneous Tissue and Breast (09)	Pregnancy and Childbirth (14)	Infectious and Parasitic Diseases (18)
CHCV and Scripps	CHCV	1.077	1.129	1.101	1.156	1.113
	SCRIPPS	1.076	1.153	1.099	1.031	1.088
Scripps and Paradise	SCRIPPS	1.093	1.115	1.099	1.154	1.118
	Paradise	1.069	1.110	1.081	1.162	1.096
CHCV and Paradise	CHCV	1.086	1.095	1.089	1.138	1.105
	Paradise	1.059	1.111	1.067	1.022	1.059
	DRGs:	1-35	103-108,110-145,478-479	257-284	370-384	415-523

Table 10: Percent Changes in Market Shares												
10%Time Increases	**Time From Scripps**	**Time From Comm.**	**predicted share**	**Market Share**	Constant Distance	**Raise Community and Scripps**	**Raise Community and Paradise**	**Raise Scripps and Paradise**	**Raise All Three**	Raise Community	Raise Scripps	Raise Paradise
NME HOSPITALS,INC.	22	25	6.10%	5.86%	-5.85%	0.67%	1.38%	1.37%	1.73%	0.34%	0.33%	1.03%
SCRIPPS MEMORIAL - CHULA VISTA	n/a	11	2.94%	3.34%	-12.64%	-13.47%	3.95%	-13.03%	-11.43%	1.66%	-14.98%	2.19%
HARBOR VIEW HEALTH PARTNERS	13	20	2.09%	1.90%	-18.21%	1.30%	1.84%	2.00%	2.61%	0.56%	0.72%	1.26%
CHILDREN'S HOSPITAL - SAN DIEGO	20	23	7.77%	6.68%	-18.29%	0.89%	1.37%	1.58%	1.95%	0.34%	0.54%	1.02%
CORONADO HOSPITAL, INC.	15	22	2.62%	1.11%	34.31%	1.72%	2.20%	2.58%	3.30%	0.66%	1.02%	1.51%
SHARP CABRILLO HOSPITAL	18	26	3.33%	3.00%	8.91%	0.85%	1.38%	1.45%	1.86%	0.39%	0.45%	0.98%
SHARP MEMORIAL HOSPITAL	19	22	4.58%	9.65%	-8.55%	0.86%	1.50%	1.63%	2.02%	0.36%	0.49%	1.13%
FALLBROOK HOSPITAL DISTRICT	79	82	2.55%	0.96%	63.31%	0.01%	0.05%	0.05%	0.06%	0.01%	0.01%	0.04%
GROSSMONT DISTRICT HOSPITAL	23	26	5.50%	7.05%	-21.57%	0.77%	1.61%	1.71%	2.07%	0.34%	0.43%	1.26%
SAN MIGUEL HOSPITAL ASSOCIATION	16	20	4.41%	0.79%	-22.56%	1.09%	1.71%	1.82%	2.34%	0.49%	0.59%	1.20%
MERCY HOSPITAL	17	23	6.07%	12.09%	-12.76%	0.94%	1.48%	1.66%	2.06%	0.38%	0.55%	1.09%
MISSION BAY MEMORIAL	21	27	1.63%	2.12%	20.41%	0.74%	1.22%	1.29%	1.64%	0.33%	0.40%	0.88%
PALOMAR POMERADO—Escondido	48	51	5.67%	6.26%	-36.97%	0.07%	0.19%	0.20%	0.23%	0.03%	0.04%	0.16%
PARADISE VALLEY HOSPITAL	9	12	5.52%	2.45%	-9.87%	2.12%	-14.80%	-14.57%	-13.74%	0.91%	1.16%	-15.60%
SCRIPPS - LA JOLLA	32	35	5.07%	6.35%	46.30%	0.45%	0.90%	0.91%	1.14%	0.22%	0.23%	0.67%
TRI-CITY HOSPITAL DISTRICT	55	58	5.83%	6.66%	-10.22%	0.04%	0.11%	0.11%	0.13%	0.02%	0.02%	0.09%
UCSD MEDICAL CENTER	19	25	7.27%	6.01%	3.15%	0.94%	1.45%	1.71%	2.08%	0.34%	0.59%	1.10%
VILLA VIEW COMMUNITY	18	22	3.54%	1.23%	-19.42%	1.01%	1.79%	1.85%	2.35%	0.47%	0.53%	1.30%
COMMUNITY HOSPITAL (CHCV)	11	n/a	2.16%	3.73%	45.34%	-14.27%	-14.01%	4.70%	-11.96%	-16.19%	2.13%	2.45%
PALOMAR POMERADO—POWAY	39	42	4.95%	3.35%	-14.63%	0.17%	0.42%	0.42%	0.51%	0.08%	0.09%	0.33%
HCA HOSPITAL	34	37	7.63%	7.57%	30.56%	0.41%	0.79%	0.80%	1.01%	0.20%	0.20%	0.59%
SCRIPPS MEMORIAL -ENCINITAS	38	41	2.77%	1.84%	53.70%	0.22%	0.47%	0.49%	0.60%	0.10%	0.12%	0.37%

Table 11: Isolated Elasticities, and Post-Merger Markups, and Price Changes

Time Elasticites (%Δt=10)

Hospital	alone	w/scripps	w/parad	w/commun	All Three
scripps	-1.5	na/	-1.3	-1.35	-1.14
paradise	-1.56	-1.46	n/a	-1.48	-1.37
community	-1.62	-1.43	-1.4	n/a	-1.2

Hospital	Avg. Revenue	Avg. Variable Cost
scripps	1714.70	727.74
paradise	2308.95	1086.95
community	3458.28	1905.96

$\frac{(P-MC)^{New}}{(P-MC)^{Old}}$

Hospital		w/scripps	w/parad	w/commun	All Three
scripps		na/	1.154	1.111	1.316
paradise		1.069	n/a	1.054	1.139
community		1.133	1.157	n/a	1.350

%Change In Price

Hospital	w/scripps	w/parad	w/commun	All Three
scripps	n/a	8.86%	6.40%	18.18%
paradise	3.62%	n/a	2.86%	7.34%
community	5.96%	7.05%	n/a	15.71%

Time Elasticites (%Δt=25)

Hospital	alone	w/scripps	w/parad	w/commun	All Three
scripps	-1.24	na/	-1.09	-1.1	-0.93
paradise	-1.33	-1.26	n/a	-1.26	-1.18
community	-1.54	-1.41	-1.39	n/a	-1.24

$\frac{(P-MC)^{New}}{(P-MC)^{Old}}$

Hospital		w/scripps	w/parad	w/commun	All Three
scripps		n/a	1.138	1.127	1.333
paradise		1.056	n/a	1.056	1.127
community		1.092	1.108	n/a	1.242

%Change In Price

Hospital	w/scripps	w/parad	w/commun	All Three
scripps	n/a	7.92%	7.33%	19.19%
paradise	2.94%	n/a	2.94%	6.73%
community	4.14%	4.84%	n/a	10.86%

Table 12: Other Mergers—Time Elasticity Approach

Hospital	Own-Elasticity	San Miguel and Mercy (a)	Scripps La Jolla and HCA (b)	Paradise and Scripps La Jolla (c)	Palomar and Fallbrook (d)	Palomar and Mercy (e)	Palomar and CHCV (f)
San Miguel	-1.521%	-1.427%					
Mercy	-1.510%	-1.437%				-1.489%	
Paradise	-1.560%			-1.506%			
Fallbrook	-0.590%				-0.475%		
Palomar, Escondido	-0.910%				-0.859%	-0.853%	-0.908%
HCA	-1.660%		-1.518%				
Scripps La Jolla	-1.981%		-1.817%	-1.926%			
CHCV	-1.619%						-1.616%

$\frac{(P-MC)^{New}}{(P-MC)^{Old}}$	Raise San Miguel and Mercy (a)	Raise Scripps La Jolla and HCA (b)	Raise Paradise and Scripps La Jolla (c)	Raise Palomar and Fallbrook (d)	Raise Palomar and Mercy (e)	Raise Palomar and CHCV (f)
San Miguel	1.066					
Mercy	1.051				1.014	
Paradise			1.036			
Fallbrook				1.241		
Palomar, Escondido				1.060	1.067	1.003
HCA		1.094				
Scripps La Jolla		1.090	1.028			
CHCV						1.002

% Change in Price	San Miguel and Mercy (a)	Scripps La Jolla and HCA (b)	Paradise and Scripps La Jolla (c)	Palomar and Fallbrook (d)	Palomar and Mercy (e)	Palomar and CHCV (f)
San Miguel	3.90%					
Mercy	3.13%				0.87%	
Paradise			1.88%			
Fallbrook				9.93%		
Palomar, Escondido				3.53%	4.00%	0.17%
HCA		4.34%				
Scripps La Jolla		3.96%	1.24%			
CHCV						0.09%

a	San Miguel and Mercy are located near each other and close to several other hospitals
b	Scripps La Jolla and HCA are a northern satellite-pair
c	Paradise and Scripps La Jolla are on opposite sides of downtown San Diego
d	Palomar and Fallbrook are remote northern hospitals
e	Palomar is remote; Mercy is large and located in downtown San Diego
f	Palomar and CHCV are located even farther on opposite sides of downtown San Diego

Table 13: Other Mergers---Rival Share Approach

$\frac{(P-MC)^{New}}{(P-MC)^{Old}}$	San Miguel and Mercy (a)	Scripps La Jolla and HCA (b)	Paradise and Scripps La Jolla (c)	Palomar and Fallbrook (d)	Palomar and Mercy (e)	Palomar and CHCV (f)
San Miguel	1.087					
Mercy	1.077				1.326	
Paradise			1.025			
Fallbrook				1.003		
Palomar, Escondido				1.441	0.818	0.898
HCA		1.109				
Scripps La Jolla		1.145	1.066			
CHCV						1.399

% Change in Price	San Miguel and Mercy (a)	Scripps La Jolla and HCA (b)	Paradise and Scripps La Jolla (c)	Palomar and Fallbrook (d)	Palomar and Mercy (e)	Palomar and CHCV (f)
San Miguel	5.52%					
Mercy	4.76%				20.09%	
Paradise			1.31%			
Fallbrook				0.11%		
Palomar, Escondido				26.10%	-10.81%	-6.02%
HCA		5.06%				
Scripps La Jolla		6.36%	2.89%			
CHCV						17.90%

a San Miguel and Mercy are located near each other and close to several other hospitals
b Scripps La Jolla and HCA are a northern satellite-pair
c Paradise and Scripps La Jolla are on opposite sides of downtown San Diego
d Palomar and Fallbrook are remote northern hospitals
e Palomar is remote; Mercy is large and located in downtown San Diego
f Palomar and CHCV are located even farther on opposite sides of downtown San Diego

Table 14: Approximate Effects of Possible Waukegan, Illinois Mergers, Based on Non-Emergency Inpatient Admissions (* denotes data omitted at the request of the data provider)

(a) Mergers: $\frac{(P-MC)^{New}}{(P-MC)^{Old}}$

Hospital	With Provena	With Victory	With MRMC	All 3
PROVENA	n/a	1.216	1.000	1.378
VICTORY	1.232	n/a	1.096	1.402
MRMC	1.259	1.243	n/a	1.744

(b) Mergers: New Prices

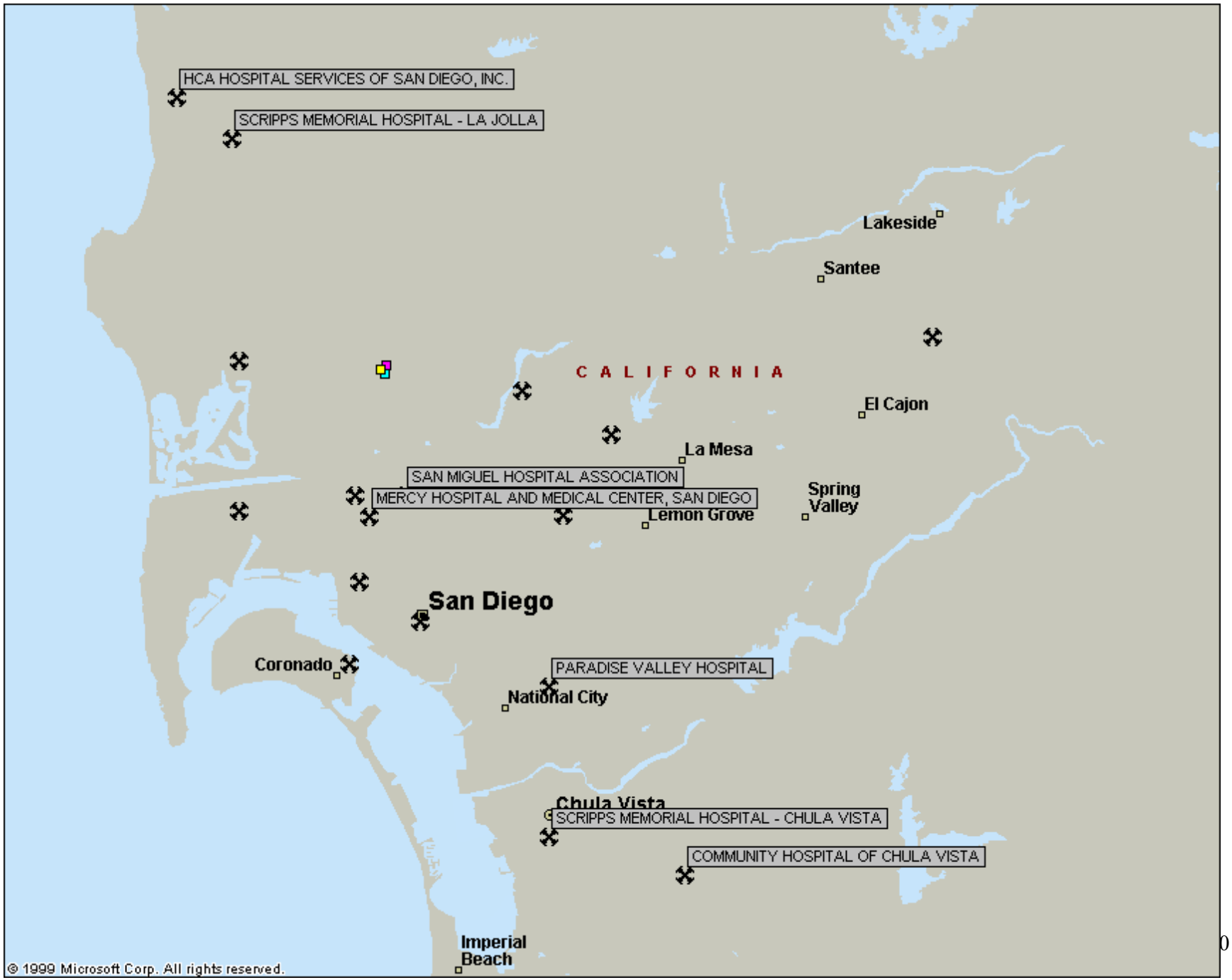
With Provena	With Victory	With MRMC	All 3
*	*	*	*
*	*	*	*
*	*	*	*

(c) Mergers: % Change in Price

Hospital	With Provena	With Victory	With MRMC	All 3
PROVENA	n/a	11.52%	0.01%	20.19%
VICTORY	10.45%	n/a	4.33%	18.12%
MRMC	11.76%	11.02%	n/a	33.72%

(d) Original Prices and Cost

Hosp	**Avg. P**	**AVC**
PROVENA	*	*
VICTORY	*	*
MRMC	*	*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