



# NATIONAL GRANGE

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*American Values. Hometown Roots.*

March 25, 2021

The Honorable Rebecca Kelly Slaughter  
Acting Chair  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Chair Slaughter:

The Grange is pleased to offer its support of the proposed acquisition of GRAIL by Illumina, a recently announced acquisition in the cancer testing space which we understand the FTC is currently reviewing.

As the oldest rural advocacy organization in the United States, the Grange represents the interests of Americans who provide essential services to the nation, especially farming. Rural life has its challenges and one of the most daunting has to do with healthcare services. Access to quality healthcare has been a consistent challenge many of us with a rural lifestyle face. A GAO [study](#) found that, since 2013, 100 rural hospital closures have resulted in patients traveling a median of 20 miles further for health care services. The prognosis is worse when it comes to proximity to specialists like oncologists. According to a [study](#) conducted by the American Society of Clinical Oncology, four in 10 rural Americans who have had cancer say that they do not live near an oncologist. As cancer care providers continue to leave rural areas or retire, this life-threatening problem will undoubtedly worsen.

The Grange and our members are interested and supportive of breakthroughs in cancer screenings like multi-cancer early detection (MCED) technology. MCED screenings have demonstrated the potential to detect cancers in their earliest stages – before the cancers have metastasized. By detecting cancers earlier, MCED technology significantly improves the chances of successful treatment.

Our current cancer screening infrastructure, which has saved untold lives, still results in millions of late-stage cancer diagnoses – many of which could be avoided by the widespread application of MCED tests. Late-stage diagnoses result in poorer healthcare outcomes for patients, exacting a potentially avoidable toll measured in unacceptably high mortality rates. By expanding the number of cancers we can detect at an early stage, MCED could reduce the economic and human costs of this disease. When cancer is detected in an early stage, nearly nine out of 10 patients survive for five years or more. But when cancer is detected in a late stage, only two in 10 patients live for five years past diagnosis.

The tremendous opportunity to reduce cancer mortality by expanding cancer early detection, and to lower costs associated with late-stage treatments, will only be achieved if these technologies can reach all patients who would benefit. Illumina's proposed acquisition of GRAIL is an important example of a merger that would lead to better outcomes for cancer patients delivered more rapidly. This merger better positions the company, and the MCED technology, to reach more patients and achieve a scale that could make a true dent in cancer mortality.

While GRAIL's test, which can detect over 50 cancers through a simple blood draw, could be the breakthrough technology for which oncologists have long searched, GRAIL faces significant technical, regulatory, and commercial barriers to achieving widespread adoption. As an international leader in the application of sequencing technology in clinical settings, Illumina offers the scale and expertise to help GRAIL overcome these barriers. Bringing multi-cancer early detection technology to as many patients as possible, as quickly as possible, will improve cancer outcomes for patients in the U.S. and abroad. This merger will save the lives of patients by improving cancer outcomes.

In closing, we strongly support Illumina's proposed acquisition of GRAIL. The Grange respectfully urges the FTC to approve this transaction immediately. Delaying this acquisition keeps the benefits of MCED from reaching patients in need. By allowing this transaction to occur immediately, the FTC could save countless lives from cancer and strike a blow against a disease that has plagued humankind for generations.

Sincerely,

A handwritten signature in cursive script that reads "Betsy E. Huber". The signature is written in black ink on a white background.

Betsy Huber  
President

CC: The Honorable Noah Joshua Phillips, Commissioner  
The Honorable Rohit Chopra, Commissioner  
The Honorable Christine S. Wilson, Commissioner