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September 21, 2005

Linda Thomsen
Director, Division of Enforcement
U.S. Securities and Exchange Commission
100 F Street NE
Washington, D.C. 20549-0213

Ms. Thomsen:

We are writing to request that you investigate insider trading activity between Thomas Frist, Jr. and his brother Bill Frist, the current U.S. Senate Majority Leader. Thomas Frist, Jr. is the largest individual shareholder in HCA, with 5.5 million shares that were worth over \$263 million at the end of trading today. Mr. Frist is an HCA Director, and has also held the positions of Chairman, President and Chief Executive Officer at the company.

Senator Frist sold all the HCA shares owned by himself and his immediate family, worth millions of dollars according to U.S. Senate disclosures, just two weeks prior to a disappointing earnings report that resulted in a double digit drop in the value of the shares.


Frist's father founded the company. His brother, Thomas, ran the company and continues to hold a position of influence. Thomas Frist, Jr. qualifies as an insider under the Securities and Exchange Act.

Senator Frist instructed the manager of his shares to sell them in mid-June as the price of HCA stock was peaking. His shares were sold by July 1 and his family's shares sold on July 8. The company's stock value fell precipitously on July 13 after the announcement of poor quarterly earnings that failed to meet expectations.

Given the close relationship between Senator Frist and Thomas Frist, it is imperative that their communications concerning the sale of Senator Frist's HCA stock be investigated fully, including use of your subpoena power to acquire phone and financial records, board meeting minutes, and other pertinent records to verify the veracity of the assertions by the subjects of the investigation.

Sincerely,


Jamie Court


Carmen Balber

cc Eliot Spitzer, New York State Attorney General
U.S. Attorneys, Southern District of New York, Southern District of Tennessee