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June 4, 2010

Via E-mail

HMG Review Project – Comment, Project No. P092900

Federal Trade Commission

Office of the Secretary, Room H-135 (Annex P)

600 Pennsylvania Avenue, NW

Washington, DC 20580

Re: “HMG Review Project - Comment, Project No. P092900”

Dear Sir or Madam:

On behalf of the American Bar Association Section of Antitrust Law, I am pleased to submit the attached comments on the proposed new Horizontal Merger Guidelines issued by the U.S. Department of Justice and the Federal Trade Commission.

Please note that these views are being presented only on behalf of the Section of Antitrust Law. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and should not be construed as representing the position of the American Bar Association.

If you have any questions after reviewing this report, I would be happy to provide further comments.

Sincerely,



Ilene K. Gotts

Chair, Section of Antitrust Law

Attachment