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April 15, 2009

Via E-mail and Express Mail

Mr. Matthew Kellison
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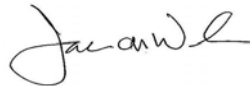
Dear Mr. Kellison:

On behalf of the American Bar Association Sections of Antitrust Law and International Law we are pleased to submit the attached comments to the Canadian Competition Bureau on its *Draft Updated Enforcement Guidelines on the Abuse of Dominance Provisions (Sections 78 and 79 of the Competition Act)*.

Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International 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, we would be happy to provide further comments.

Sincerely,



James A. Wilson
Chair, Section of Antitrust Law



Aaron Schildhaus
Chair, Section of International Law