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June 8, 2006

**Via Overnight Express and E-mail**

Mr. Philip Lowe  
Director General, Directorate General Competition  
European Commission  
B-1049, Brussels  
Belgium

Re: Comments Regarding the Commission's Discussion Paper on the  
Application of Article 82 of the Treaty to Exclusionary Abuses

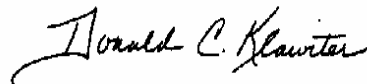
Dear Mr. Lowe:

On behalf of the Sections of Antitrust Law and International Law of the American Bar Association, we are pleased to submit the enclosed comments (and attachment) to the Commission of the European Communities in response to the Commission's Discussion Paper on the Application of Article 82 of the Treaty to Exclusionary Abuses.

Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International Law and 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,



Donald C. Klawiter  
Chair, Section of Antitrust Law



Michael H. Byowitz  
Chair, Section of International Law

Enclosure