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November 30, 2009

**Via E-mail and Express Mail**

European Commission  
Directorate-General for Competition  
Antitrust Registry  
Ref.: HT.1221 – stakeholder input  
1049 Bruxelles/Brussel  
BELGIQUE/BELGIE

Dear Director General Lowe:

On behalf of the American Bar Association Section of Antitrust Law, I am pleased to submit the attached comments to the European Commission in response to its request for comments on the revised draft Block Exemption Regulation for Insurance Sector.

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, we would be happy to provide further comments.

Sincerely,



Ilene K. Gotts  
Chair, Section of Antitrust Law

Attachment