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March 26, 2008

Via E-mail and Express Mail

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Re: Comments to the Australian Consumer and Competition Commission
Regarding Draft Merger Guidelines 2008

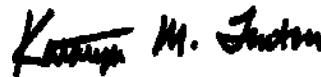
Dear Sirs:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached comments to the Australian Consumer and Competition Commission regarding its Draft Merger Guidelines 2008.

Please note that these views are only being presented 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,



Kathryn M. Fenton
Chair, Section of Antitrust Law



Jeffrey B. Golden
Chair, Section of International Law

Attachment