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August 11, 2009

Via E-mail and Express Mail

David Faye, Competition Law Officer

Competition Bureau

50 Victoria Street

Gatineau, Quebec

K1A 0C9

Dear Mr. Faye:

On behalf of the American Bar Association Sections of Antitrust Law and International Law we are pleased to submit the attached comments to the Competition Bureau in response to its request for comments on the Draft Competitor Collaboration Guidelines.

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,



Ilene K. Gotts

Chair, Section of Antitrust Law



Glenn P. Hendrix

Chair, Section of International Law

Attachment