



ASSOCIATION YEAR
2003-2004

CHAIR
Kevin E. Grady
One Atlantic Center
1201 West Peachtree St., NW
Atlanta, GA 30309-3424

CHAIR-ELECT
Richard J. Wallis
1 Microsoft Way
Redmond, WA 98052-6399

VICE-CHAIR
Donald C. Klaviter
1111 Pennsylvania Ave., NW
Washington, DC 20004-2541

SECRETARY
William L. Greene
Minneapolis, MN

COMMITTEE OFFICER
Kathryn M. Fenton
Washington, DC

FINANCE OFFICER
Barbara O. Bruckmann
Washington, DC

INTERNATIONAL OFFICER
William Blumenthal
Washington, DC

PROGRAM OFFICER
Joseph Angland
Washington, DC

PUBLICATIONS OFFICER
James A. Wilson
Columbus, OH

SECTION DELEGATES
Allan Van Fleet
Houston, TX

Janet L. McDavid
Washington, DC

IMMEDIATE PAST CHAIR
Robert T. Joseph
Chicago, IL

COUNCIL MEMBERS
Stephen W. Armstrong
Philadelphia, PA

Calvin S. Goldman
Toronto, Ontario

Irene Knable Gots
New York, NY

James E. Hartley
Denver, CO

Roxann E. Henry
Washington, DC

Robert M. Langer
Hartford, CT

Jeffery A. LeVee
Los Angeles, CA

William C. MacLeod
Washington, DC

M. Howard Morse
Washington, DC

Kevin J. O'Connor
Madison, WI

Debra J. Pearlstein
New York, NY

Keith D. Shugarman
Washington, DC

Richard M. Steuer
New York, NY

Patricia M. Vaughan
Washington, DC

Theodore Voorhees
Washington, DC

JUDICIAL REPRESENTATIVE
Honorable Diane P. Wood
Chicago, IL

DEPARTMENT OF JUSTICE REPRESENTATIVE
Honorable R. Hewitt Pate
Washington, DC

NAAG REPRESENTATIVE
Patricia A. Connors
Tallahassee, FL

FTC REPRESENTATIVE
Honorable Timothy J. Muris
Washington, DC

BOARD OF GOVERNORS REPRESENTATIVE
Blake Tartt
Houston, TX

YOUNG LAWYERS DIVISION REPRESENTATIVE
Matthew Bye
Washington, DC

SECTION DIRECTOR
Joanne Travis
(312) 988-5575
travisj@staff.abanet.org

AMERICAN BAR ASSOCIATION

May 25, 2004

Via Express Mail, Facsimile and E-mail

Ms. Lourdes DaCosta
Competition Bureau
Place du Portage 1
50 Victoria Street
Gatineau, Quebec K1A 0C9

Re: Draft Merger Enforcement Guidelines

Dear Ms. DaCosta:

On behalf of the American Bar Association Sections of Antitrust Law and International Law and Practice ("the Sections"), we are pleased to submit the enclosed comments to the Competition Bureau in response to the Bureau's request for comments on the Draft Merger Enforcement Guidelines.

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

Kevin E. Grady
Chair, Section of Antitrust Law

Andrew J. Markus
Chair, Section of International Law and Practice

Enclosure

Cc: Honorable Sheridan Scott