



ASSOCIATION YEAR
2004-2005

AMERICAN BAR ASSOCIATION

Section of Antitrust Law

321 N. Clark Street
Chicago, Illinois 60610-4714
(312) 988-5550
FAX: (312) 988-5637
E-mail: antitrust@abanet.org
http://www.abanet.org/antitrust

CHAIR
Richard J. Wallis
1 Microsoft Way
Redmond, WA 98052-8300

CHAIR-ELECT
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1111 Pennsylvania Avenue, NW
Washington, DC 20004-2541

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1301 Avenue of the Americas
New York, NY 10019-6022

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SECTION DIRECTOR
Joanne Travis
Chicago, IL
(312) 988-5575
(312) 988-5637
travisj@staff.abanet.org

September 10, 2004

Via E-mail and Express Mail

Mr. David Roberts
Director of Remedies
Competition Commission
Victoria House
Southampton Row
London
WC1B 4AD

Dear Mr. Roberts:

The Section of Antitrust Law and the Section of International Law of the American Bar Association (collectively, the "Sections") are pleased to submit the enclosed joint comments in response to the United Kingdom Competition Commission's request for comments on the Draft Guidelines on Application of Divestiture Remedies in Merger Inquiries under the Enterprise Act 2002.

The views expressed herein are being presented jointly on behalf of the Sections. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and, accordingly, should not be construed as representing the policy of the Association.

If you have any questions after reviewing this report, we would be happy to provide further comments.

Sincerely,

Richard J. Wallis
Chair, Section of Antitrust Law

Kenneth B. Reisenfeld
Chair, Section of International Law

Enclosure