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November 16, 2006

Via E-mail and Express Mail

Mr. Kirtikumar Mehta
Director, Cartels
Directorate General Competition
European Commission
Rue de la Loi 200
B-1049 Brussels, Belgium

**Re: Comments Regarding the Commission's Draft Notice on Immunity From
Fines and Reduction in Fines in Cartel Cases**

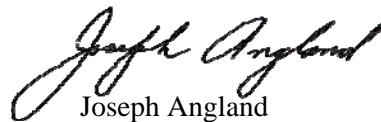
Dear Mr. Mehta:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the enclosed comments to the Commission of the European Communities in response to its request for comments regarding the Draft Notice on Immunity From Fines and Reduction in Fines in Cartel Cases.

Please note that these views are being presented only 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,


Joseph Angland


Deborah Enix-Ross

Enclosure