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October 7, 2008

Via E-mail and Express Mail

Mr. Anthony Durocher
Senior Competition Law Officer
Competition Bureau Canada
300 West Georgia Street
Vancouver, British Columbia
V6B 6E1

Re: Comments on the Canada Competition Bureau's Draft Bulletin on Efficiencies in Merger Review

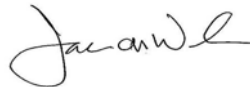
Dear Mr. Durocher:

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 of Canada regarding its Draft Bulletin on Efficiencies in Merger Review.

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,



James A. Wilson
Chair, Section of Antitrust Law



Aaron Schildhaus
Chair, Section of International Law