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December 1, 2008

Via E-mail and Express Mail

European Commission
DG Competition
Merger Registry
B-1049 BRUSSELS

Re: HT.1277 - Reply to Public Consultation

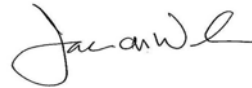
Dear Director General Lowe:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached comments to the European Commission in response to the Questionnaire issued by the Commission in connection with its Report on Regulation 139/2004 (Merger Regulation).

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

Attachment