

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](mailto:antitrust@abanet.org)  
<http://www.abanet.org/antitrust>

ASSOCIATION YEAR  
2005-2006

**CHAIR**  
Donald C. Klawiter  
1111 Pennsylvania Avenue, N.W.  
Washington, DC 20004

**CHAIR-ELECT**  
Joseph Angland  
7 Times Square  
New York, NY 10036

**VICE-CHAIR**  
Kathryn M. Fenton  
51 Louisiana Avenue, N.W.  
Washington, DC 20001-2105

**SECRETARY AND  
COMMUNICATIONS OFFICER**  
Keith D. Shugartman  
Washington, DC

**COMMITTEE OFFICER**  
Allan Van Fleet  
Houston, TX

**FINANCE OFFICER**  
William L. Greene  
Minneapolis, MN

**INTERNATIONAL OFFICER**  
Ilene Knable Gotts  
New York, NY

**PROGRAM OFFICER**  
Debra J. Pearlstein  
New York, NY

**PUBLICATIONS OFFICER**  
Theodore Voorhees  
Washington, DC

**SECTION DELEGATES**  
Richard M. Steyer  
New York, NY

James A. Wilson  
Columbus, OH

**IMMEDIATE PAST CHAIR**  
Richard J. Wallis  
Redmond, WA

**COUNCIL MEMBERS**  
Jonathan B. Baker  
Washington, DC

David H. Evans  
Washington, DC

H. Stephen Hamis  
Atlanta, GA

James E. Hartley  
Denver, CO

Roxann E. Henry  
Washington, DC

Christopher B. Hockett  
San Francisco, CA

Joseph G. Krauss  
Washington, DC

Robert M. Langer  
Hartford, CT

William C. MacLeod  
Washington, DC

Neil P. Motenko  
Boston, MA

Leslie C. Overton  
Washington, DC

Richard G. Parker  
Washington, DC

Debra A. Valentine  
Hartford, CT

Patricia M. Vaughan  
Washington, DC

Daniel M. Wall  
San Francisco, CA

**DOJ REPRESENTATIVE**  
Thomas O. Barnett  
Washington, DC

**FTC REPRESENTATIVE**  
Deborah Platt Majoras  
Washington, DC

**JUDICIAL REPRESENTATIVE**  
Hon. Diane P. Wood  
Chicago, IL

**NAAG REPRESENTATIVE**  
Robert L. Hubbard  
New York, NY

**BOARD OF  
GOVERNORS REPRESENTATIVE**  
James M. Sturdivant  
Tulsa, OK

**YOUNG LAWYERS  
DIVISION REPRESENTATIVE**  
Albert Y. Kim  
Washington, DC

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

February 8, 2006

**Via Express Mail and E-mail**

Antitrust Modernization Commission  
Attention: Public Comments  
1120 G Street, N.W.  
Suite 810  
Washington, DC 20005

**Re: Comments Regarding the Technical or Procedural Changes that the United States Could Implement to Facilitate Further Coordination with Foreign Antitrust Authorities**

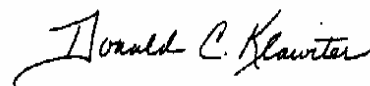
Ladies and Gentlemen:

On behalf of the Section of Antitrust Law of the American Bar Association, I am pleased to submit the enclosed comments to the Antitrust Modernization Commission in response its request for public comments regarding the Technical or Procedural Changes that the United States Could Implement to Facilitate Further Coordination with Foreign Antitrust Authorities.

Please note that these views are being presented only on behalf of the Section of Antitrust 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,



Donald C. Klawiter  
Chair, Section of Antitrust Law