

**AMERICAN BAR ASSOCIATION****Section of Antitrust Law**

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August 5, 2009

**Via E-mail and Express Mail**

Mr. Tony Gooch  
Competition Commission  
Victoria House  
Southampton Row  
London  
WC1B 4AD

Dear Mr. Gooch:

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 Commission and Office of Fair Trading regarding the joint Draft Merger Assessment Guidelines.

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,



Ilene K. Gotts  
Chair, Section of Antitrust Law



Glenn P. Hendrix  
Chair, Section of International Law