



ASSOCIATION YEAR
2004-2005

AMERICAN BAR ASSOCIATION

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August 2, 2005

Via E-mail and Express Mail

General Affairs Division, Secretariat
Fair Trade Commission of Japan
Central Government Office Building 6, Annex B
1-1-1 Kasumigaseki, Chiyoda-ku
Tokyo 100-8987 JAPAN

Re: Joint Comments of the ABA Sections of Antitrust and
International Law on the Japan Fair Trade Commission Draft
Leniency Rules

Dear Sir or Madam:

The Section of Antitrust Law and the Section of International Law of the American Bar Association (collectively, the "Sections") are pleased to submit the enclosed joint comments on the Japan Fair Trade Commission's Draft Rules on Reporting and Submission of Materials Regarding Immunity from or Reduction of Surcharges Implementing the Amended Act Concerning Prohibition of Private Monopolization and Maintenance of Fair Trade. A Japanese translation will be submitted shortly under separate cover.

The views expressed herein are presented jointly on behalf of the Sections. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association, and, accordingly, should not be construed as representing the policy of the American Bar Association.

If you have any questions after reviewing this report, we would be happy to provide further comments.

Sincerely,

Richard J. Wallis, Chair,
Section of Antitrust Law

Kenneth B. Reisenfeld, Chair,
Section of International Law

Enclosure

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