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February 11, 2010

**Via E-mail and Express Mail**

Mr. Nicholas Hill

Divestment Guidelines Feedback

Commerce Commission, PO Box 2351, Wellington, 6140

New Zealand

Dear Mr. Hill:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached comments to the New Zealand Commerce Commission regarding its *Draft Mergers and Acquisitions Divestment Remedies Guidelines*, issued in December 2009.

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

Attachment