

AMERICAN BAR ASSOCIATION

Section of Antitrust Law

321 North 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>

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(312) 988-5575

(312) 988-5637

[travisj@staff.abanet.org](mailto:travisj@staff.abanet.org)

March 20, 2007

**Via E-mail and Express Mail**

Mr. WU Zhenguo

Deputy Director General

Department of Treaty and Law/Anti-Monopoly Office

Ministry of Commerce

2, Dong Chang An Ave.

Beijing 100731 China

**Re: Joint Comments Regarding the Ministry of Commerce Guidelines on Antitrust Filings for Mergers & Acquisitions of Domestic Enterprises by Foreign Investors**

Dear Mr. Wu:

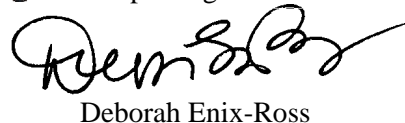
On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the enclosed comments to the People's Republic of China Ministry of Commerce regarding the Guidelines on Antitrust Filings for Mergers & Acquisitions of Domestic Enterprises by Foreign Investors. A Chinese translation of the comments is also enclosed.

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,

  
Joseph Angland

  
Deborah Enix-Ross

Enclosure