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October 13, 2010

Via Electronic Submission

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex S)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Comments to Federal Trade Commission Regarding Proposed Amendments to the Hart-Scott-Rodino (HSR) Form

Dear Sir or Madam:

We are pleased to submit the attached comments on behalf of the Sections of Antitrust Law and International Law of the American Bar Association regarding the FTC's proposed amendments to the Hart-Scott-Rodino Premerger Notification Rules, the Premerger Notification and Report Form and associated Instructions as reflected in the notice of proposed rulemaking issued by the Federal Trade Commission on August 13, 2010.

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 policy of the American Bar Association.

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

Sincerely,



Allan Van Fleet
Chair, Section of Antitrust Law



Salli A. Swartz,
Chair, Section of International Law

Attachment