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November 20, 2007

Via E-mail and Express Mail

South Africa Competition Commission
Competition Commission Registry Office, DTI Campus,
Mulayo Building (Block C),
77 Meintjies Street, Sunnyside
Pretoria, South Africa

Re: Competition Commission of South Africa's Corporate Leniency Policy Review
Discussion Paper

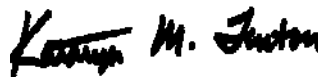
Ladies and Gentlemen:

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 of South Africa concerning its Corporate Leniency Policy Review Discussion Paper.

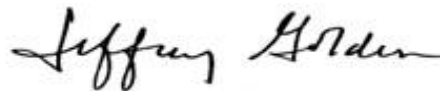
Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International Law. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and should not be construed as representing the position of the American Bar Association.

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

Sincerely,



Kathryn M. Fenton
Chair, Section of Antitrust Law



Jeffrey B. Golden
Chair, Section of International Law