April 19, 2012

Via E-mail and Express Mail
consulta012012@cade.gov.br

Conselho Administrativo de Defesa Economica
CADE SCN Qd. 2 - Projeção C,
70712-902, Brasilia, Brazil

Dear Sirs:

Re: Proposed Regulations on Merger Control and on Calculation of Fines in Cartel Cases

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached comments (English and Portuguese translations) to the Administrative Council for Economic Defense (CADE) regarding its Proposed Regulations on Merger Control and on Calculation of Fines in Cartel Cases.

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,

Richard M. Steuer
Chair, Section of Antitrust Law

Michael E. Burke
Chair, Section of International Law

Attachment