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February 9, 2011

Via E-mail

Mr. Ya Zhang
Telecommunications Department
Ministry of Industry and Information Technology
13 West Changan Avenue
Beijing 100804
China

Re: Comments on Draft Interim Measures for Supervision and Management of the
Internet Information Service Market

Dear Mr. Zhang:

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 Ministry of Industry and Information Technology's (MIIT) Draft Interim Measures for Supervision and Management of the Internet Information Service Market.

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