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**Section of Antitrust Law**  
321 North Clark Street  
Chicago, IL 60654-7598  
(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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[Travisj@staff.abanet.org](mailto:Travisj@staff.abanet.org)

May 27, 2010

Via E-mail

Mr. Tony Gooch  
Competition Commission

**Re: Draft Joint Merger Assessment Guidelines**

Dear Mr. Gooch:

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 (CC) and Office of Fair Trading (OFT) regarding their joint Draft Merger Assessment Guidelines.

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,



Ilene K. Gotts  
Chair, Section of Antitrust Law



Glenn P. Hendrix  
Chair, Section of International Law

Attachment