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March 18, 2008

Via E-mail and Express Mail

Mr. Kazuhiko Takeshima
Chairman
Japan Fair Trade Commission
100-8987 1-1-1 Kasumigaseki,
Chiyoda-ku, Tokyo, Japan

Mr. Hideo Nakajima
Deputy Secretary-General for International Affairs
Japan Fair Trade Commission
100-8987 1-1-1 Kasumigaseki,
Chiyoda-ku, Tokyo, Japan

Re: Comments to the Japan Fair Trade Commission regarding its
Proposed Amendments to the Japan Antimonopoly Law

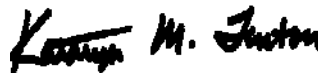
Dear Chairman Takeshima and Deputy Secretary-General Nakajima:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached comments to the Japan Fair Trade Commission regarding its proposed amendments to the Japan Antimonopoly Law.

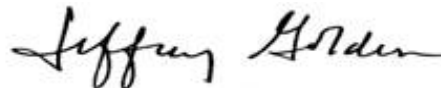
Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International Law. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and should not be construed as representing the position of the American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

Attachment