

**ASSOCIATION YEAR
2010 - 2011**

CHAIR
Allan Van Fleet
1000 Louisiana Street
Houston, TX 77002-5018

CHAIR ELECT
Richard M. Steuer
1675 Broadway
New York, NY 10019-5820

VICE CHAIR
Theodore Voorhees, Jr.
1201 Pennsylvania Ave, NW
Washington, DC 20004-2401

COMMITTEE OFFICER
Brian R. Henry
Atlanta, GA

**CONSUMER PROTECTION
OFFICER**
William C. MacLeod
Washington, DC

FINANCE OFFICER
Howard Feller
Richmond, VA

IMMEDIATE PAST CHAIR
Ilene Knable Gotts
New York, NY

INTERNATIONAL OFFICER
Roxann E. Henry
Washington, DC

PROGRAM OFFICER
Bernard A. Nigro, Jr.
Washington, DC

PUBLICATIONS OFFICER
Jonathan M. Jacobson
New York, NY

**SECRETARY AND
COMMUNICATIONS OFFICER**
Leslie C. Overton
Washington, DC

SECTION DELEGATES
Christopher B. Hockett
Menlo Park, CA

Joseph G. Krauss
Washington, DC

COUNCIL MEMBERS
Adam J. Biegel
Atlanta, GA

Alicia L. Downey
Boston, MA

Michael G. Egge
Washington, DC

Andrew I. Gavil
Washington, DC

Kenneth L. Glazer
Washington, DC

Ray V. Hartwell, III
Washington, DC

August T. Horvath
New York, NY

Pamela Jones Harbour
Washington, DC

Elizabeth F. Kraus
Washington, DC

Jeffrey A. LeVee
Palo Alto, CA

Mark S. Popofsky
Washington, DC

J. Robert Robertson
Washington, DC

Douglas C. Ross
Seattle, WA

Patrick S. Thompson
San Francisco, CA

Mark D. Whitener
Washington, DC

**NON-U.S. LAWYER
REPRESENTATIVE**
Rachel C. Brandenburger
Washington, DC

**NON-LAWYER
REPRESENTATIVE**
David T. Scheffman
Washington, DC

DOJ REPRESENTATIVE
Christine A. Varney
Washington, DC

FTC REPRESENTATIVE
Jon Leibowitz
Washington, DC

JUDICIAL REPRESENTATIVE
Douglas H. Ginsburg
Washington, DC

**STATE ATTORNEYS
GENERAL REPRESENTATIVE**
James A. Donahue, III
Harrisburg, PA

**BOARD OF GOVERNORS
REPRESENTATIVE**
Carlos A. Rodriguez-Vidal
San Juan, PR

**YOUNG LAWYERS
DIVISION REPRESENTATIVE**
Svetlana S. Gans
Washington, DC

SECTION DIRECTOR
Joanne Travis
Chicago, IL

September 10, 2010

Via E-mail

immunityconsultation@tca.ie

Re: The Irish Competition Authority's Cartel Immunity Programme Review

Dear Competition Authority members and Director of Public Prosecutions:

On behalf of the American Bar Association Sections of Antitrust Law, Criminal Justice, and International Law, we are pleased to submit the attached comments to the Irish Competition Authority regarding its proposed revisions to the Cartel Immunity Programme, as described in its Consultation Paper released on July 15, 2010.

Please note that these views are being presented only on behalf of the Sections of Antitrust Law, Criminal Justice, 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



Bruce A. Green,
Chair, Section of Criminal Justice

Attachment