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June 24, 2010

**Via E-mail and Overnight Mail**

European Commission  
Directorate-General for Competition  
Antitrust Registry  
Ref.: HT.1407  
1049 Bruxelles/Brussel  
BELGIQUE/BELGIË

**Re: Public Comments on the Draft Regulations and Guidelines for the Assessment of Cooperation Agreements Between Competitors**

Dear Director-General Italianer:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached comments to the European Commission regarding its *Draft Regulations and Guidelines for the Assessment of Cooperation Agreements Between Competitors*.

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