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May 10, 2007

Via E-mail and Express Mail

European Commission
Directorate-General for Competition
Consultation Non-horizontal Merger Guidelines
Merger Registry
B-1049 Brussels

Re: Joint Comments Regarding the Draft Guidelines on the Assessment of Non-horizontal Mergers Under the Council Regulation on the Control of Concentrations Between Undertakings

Dear Mr. Lowe:

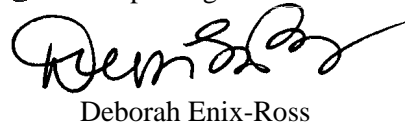
On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the enclosed comments to the European Commission in response to the Commission's request for comments regarding the draft guidelines on the assessment of non-horizontal mergers under the Council Regulation on the control of concentrations between undertakings.

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,


Joseph Angland


Deborah Enix-Ross

Enclosure