

**ASSOCIATION YEAR**  
2009-2010

**CHAIR**

Ilene Knable Gotts  
51 West 52nd Street  
New York, NY 10019-6119

**CHAIR ELECT**

Allan Van Fleet  
100 Louisiana Street  
Houston, TX 77002-5018

**VICE CHAIR**

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

**SECRETARY AND**

**COMMUNICATIONS OFFICER**  
Howard Feller  
Richmond, VA

**COMMITTEE OFFICER**

Brian R. Henry  
Atlanta, GA

**FINANCE OFFICER**

Keith D. Shugarman  
Washington, DC

**INTERNATIONAL OFFICER**

Theodore Voorhees, Jr.  
Washington, DC

**PROGRAM OFFICER**

Bernard A. Nigro, Jr.  
Washington, DC

**PUBLICATIONS OFFICER**

Debra J. Pearlstein  
New York, NY

**SECTION DELEGATES**

Christopher B. Hockett  
Menlo Park, CA

Joseph G. Krauss  
Washington, DC

**IMMEDIATE PAST CHAIR**

James A. Wilson  
Columbus, OH

**COUNCIL MEMBERS**

Alicia L. Downey  
Boston, MA

Michael G. Egge  
Washington, DC

Deborah A. Garza  
Washington, DC

Andrew J. Gavil  
Washington, DC

Kenneth L. Glazer  
Washington, DC

Jonathan M. Jacobson  
New York, NY

Deborah Platt Majoras  
Cincinnati, OH

Mark S. Popofsky  
Washington, DC

J. Robert Robertson  
Washington, DC

Douglas C. Ross  
Seattle, WA

Patrick S. Thompson  
San Francisco, CA

Randolph W. Tritell  
Washington, DC

John E. Villafranco  
Washington, DC

Mark D. Whitener  
Washington, DC

Gary P. Zanfagna  
Morristown, NJ

**NON-U.S. LAWYER**

**REPRESENTATIVE**  
Calvin S. Goldman  
Toronto, ON

**NON-LAWYER**

**REPRESENTATIVE**  
David T. Scheffman  
Washington, DC

**DOJ REPRESENTATIVE**

Christine A. Vamey  
Washington, DC

**FTC REPRESENTATIVE**

Jonathan D. Leibowitz  
Washington, DC

**JUDICIAL REPRESENTATIVE**

Douglas H. Ginsburg  
Washington, DC

**STATE ATTORNEYS**

**GENERAL REPRESENTATIVE**

James A. Donahue III  
Harrisburg, PA

**BOARD OF GOVERNORS**

**REPRESENTATIVE**  
Paulette Brown  
Madison, NJ

**YOUNG LAWYERS**

**DIVISION REPRESENTATIVE**

Svetlana S. Gans  
Washington, DC

**SECTION DIRECTOR**

Joanne Travis  
Chicago, IL  
Travisj@staff.abanet.org

**AMERICAN BAR ASSOCIATION**

**Section of Antitrust Law**

321 North Clark Street

Chicago, IL 60654-7598

(312) 988-5550

FAX: (312) 988-5637

E-mail: antitrust@abanet.org

http://www.abanet.org/antitrust

September 1, 2009

Planning Office, General Affairs Division, Economic Affairs Bureau  
Secretariat, Japan Fair Trade Commission  
Central Government Office Building 6, Annex B  
1-1-1 Kasumigaseki, Chiyoda-ku, Tokyo  
100-8987 JAPAN

Dear Secretary-General Matsuyama:

Attached is the final corrected version of the Japanese translation of the ABA Antitrust Law and International Law Sections' comments on the *Draft Guidelines for the Exclusionary Private Monopolization under the Antimonopoly Act*, incorporating a small number of non-substantive corrections. This document should replace the translation submitted on August 31, 2009.

Thank you again for this opportunity to provide comments.

Sincerely,



Ilene K. Gotts  
Chair, Section of Antitrust Law



Glenn P. Hendrix  
Chair, Section of International Law

Attachment