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AMERICAN BAR ASSOCIATION

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October 31, 2007

Ms. Shara L. Aranoff
Vice Chair
U.S. International Trade Commission
500 E Street, S.W.
Washington, D.C. 20436

RE: ITC Sunshine Act Interpretation

Dear Ms. Aranoff:

At the meeting of the House of Delegates of the American Bar Association held August 13-14, 2007, the enclosed resolution was adopted upon recommendation of the Section of International Law and the Section of Administrative Law and Regulatory Practice. Thus, this resolution now states the official policy of the Association.

We are transmitting it for your information and whatever action you think appropriate. Please advise if you need any further information, have any questions or if we can be of any assistance. Such inquiries should be directed to the Chicago office.

Sincerely yours,



Armando Lasas-Ferrer

ALF/nmr
enclosure

cc:

Jeffrey B. Golden
Alison Nelson
Leanne Pfautz ✓
Michael R. Asimow

Mark D. Agrast
Kimberly Knight
Denise Cardman

**AMERICAN BAR ASSOCIATION
ADOPTED BY THE HOUSE OF DELEGATES
August 13-14, 2007**

RECOMMENDATION

RESOLVED, That the American Bar Association supports the International Trade Commission's ("ITC") adoption of procedures relevant to its compliance with the Government in the Sunshine Act, 5 U.S.C. § 552(b), that:

1. Support the ITC's interpretation of the term "meeting" under the Government in the Sunshine Act to permit Commissioners to meet in a non-public manner as a body to discuss aspects of a particular investigation, prior to making a decision;
2. Urge the ITC to employ, when applicable, Exemptions Four (discussion of confidential information) and Ten (formal agency adjudication) of the Government in the Sunshine Act; and
3. Upon announcing their votes to the public, the Commissioners individually explain the rationale underlying the Commissioner's vote.

118B was also sent to the following:

Mr. Daniel R. Pearson
Chair
U.S. International Trade Commission
USITC Building, Room 700
500 E Street, S.W.
Washington, D.C. 20436

Ms. Shara L. Aranoff
Vice Chair
U.S. International Trade Commission
500 E Street, S.W.
Washington, D.C. 20436