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February 2, 2009

Economic Analysis Office
Anti-Monopoly Bureau
Ministry of Commerce
2 Dong Chang An Avenue
Beijing 100731
People's Republic of China

Dear Sir/Madam:

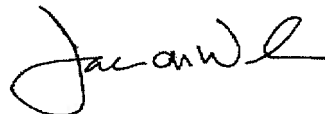
On behalf of the American Bar Association Sections of Antitrust Law and International Law, I am pleased to submit the attached Joint Comments on the Draft Guidelines for Definition of Relevant Market of China's Ministry of Commerce including translation. The views expressed herein are being presented 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, accordingly, should not be construed as representing the position of the Association.

These documents have also been sent via fax and e-mail. If you have any questions, please let us know. We appreciate the opportunity to provide comments.

Sincerely,



Aaron Schildhaus
Section of International Law Chair, 2008-09



James A. Wilson
Section of Antitrust Law Chair, 2008-09

Attachment

