October 30, 2015

Via Email:
consultation@compcomm.hk

Submissions on Draft Leniency Policy
Competition Commission
Room 3601, 36/F Wu Chung House
213 Queen’s Road East
Wanchai, HONG KONG

Re: Joint Comments on the Hong Kong Competition Commission’s September 23, 2015 Draft Leniency Policy for Undertakings Engaged in Cartel Conduct

Dear Sir/Madam:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached comments on the Hong Kong Competition Commission’s September 23, 2015 Draft Leniency Policy for Undertakings Engaged in Cartel Conduct.

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 of the Board of Governors of the American Bar Association and should not be construed as representing the policy of the American Bar Association.

If you have any comments or questions after reviewing this report, we would be happy to provide further comments.

Sincerely,

Roxann E. Henry
Chair, Section of Antitrust Law

Lisa J. Savitt
Chair, Section of International Law

Attachment