



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

*Office of the Director
Bureau of Competition*

March 18, 2011

Christopher J. MacAvoy, Esq.
Baker Botts LLP
The Warner
1299 Pennsylvania Ave., NW
Washington, D.C. 20004-2400

Re: SuperValu, Inc./C&S Wholesale Grocers, Inc.,
File No. 091-0119

Dear Mr. MacAvoy:

The Federal Trade Commission's Bureau of Competition has been conducting a nonpublic investigation to determine whether SuperValu, Inc., C&S Wholesale Grocers, Inc., or any other unnamed persons, partnerships, or corporations have engaged or are engaging in any unfair methods of competition in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended, by agreeing to divide markets, allocate customers, or otherwise eliminate competition in the wholesale grocery industry.

Upon further review of this matter, it now appears that no additional action is warranted by the Commission at this time. Accordingly, pursuant to authority delegated by the Commission, 49 Fed. Reg. 6171 (1984), the investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Peter J. Levitas".

Peter J. Levitas
Deputy Director