

803.8

Verne, B. Michael

From: [REDACTED]
Sent: Friday, January 26, 2007 8:46 AM
To: Verne, B. Michael
Subject: Mike,

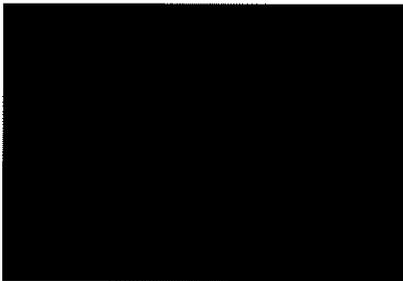


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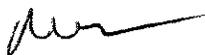
Mike,

Sorry for the interruption. However, you have always been very helpful and I appreciate your courtesy and assistance, both in the past and in anticipation of this instance as well. We have a potential HSR filing that we are looking at which involves two foreign issuers. We anticipate we will probably receive documents, in the form of financial statements and perhaps other kinds of documents required to be attached under Item 4, that may be in a foreign language. The only rule I have found that deals with when you have to interpret or translate foreign languages is Rule 803.8, which I understand basically provides that if an English translation exists, then you need to provide both the English translation and the foreign document with the exception being upon a second request. I also found an informal interpretation that you had previously given and I have attached that for your reference.

Question: Are there any other rules that I have overlooked, or is my understanding correct, that if no English translations of such documents exist, we can simply provide the foreign documents, but if we were to create any kind of summary to assist the FTC, or if that English document existed at the current time, then we would need to provide both the English translation and the foreign document. If it is not too much trouble, I would just like you to confirm that my understanding is correct. Or, can you assist me by pointing me to other FTC guidance on how to deal with and file foreign documents? Thanks, Mike.



Your understanding is correct


1/26/07