

4(c)

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September 11, 2007

B. Michael Verne
Federal Trade Commission
Premerger Notification Office
601 Pennsylvania Avenue, NW
Room 303
Washington, D.C. 20580

Re: Item 4(c) Question

Dear Mike,

This is confirming our telephone conversation regarding how to handle classified 4(c) documents. Our client has documents responsive to Item 4(c) that have classification levels above Top Secret (Special Compartmentalized Access). You confirmed that we could withhold these documents from our HSR filing because the FTC staff does not have the type of clearance necessary to review these documents.

Thank you for your assistance with this matter.

Yours truly,

[Redacted Signature]

[Redacted]

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Acara

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9/11/07

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