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File

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January 31, 1985

Mr. Anthony Scanlon
Premerger Notification Office
Bureau of Competition
Seventh Street and Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Feb 1 3 13 ... 1985

Dear Mr. Scanlon:

Thank you for your assistance today in explaining to me by telephone the requirements of Item 9 of the current "Notification And Request Form For Certain Mergers And Acquisitions" (FTC Form C 4) (rev. 9/84). This letter is to confirm my understanding of your explanation of those requirements as they are set forth in the Instructions that accompany that form.

JTC 2/5/84
Scanlon

The Instructions provide that, for purposes of Item 9, a previous acquisition should only be listed if, in addition to satisfying the other requirements of Item 9, it "had annual net sales or total assets greater than \$10 million in the year prior to the acquisition." This requirement is only satisfied if those net sales or total assets were all in the same 4 digit industry, that industry being the same 4 digit industry that is the basis for listing under Item 9.

Very truly yours,

[Redacted signature]

He will send another letter on phone conversation 2/5/84

In accordance with determination that acquisition in same SIC code also acquisition in different SIC code had sales or assets in excess of \$10m must be listed
1/24/85