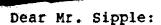


BY HAND

John M. Sipple, Jr., Esq.
Premerger Notification Office
Bureau of Competition
Federal Trade Commission
Pennsylvania Avenue at
Sixth Street, N.W.
Room 396
Washington, DC 20580

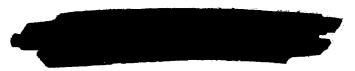


This supplements my letter to Jeffrey Zuckerman, dated October 5, 1987.

We suspect that these additional purchases, like the earlier ones described in my October 5 letter, were made through John Sipple, Esq. October 22, 1987 Page Two

In light of the accelerated accumulation of stock in continuing violation of the HSR Act, we relterate our request that the Commission commence an immediate investigation into the methods and devices which have been employed by to acquire their holdings of securities. Such an investigation cannot wait until Rile a Schedule 13D. As the article reports, it is a common tactic for acquire a stake just under 5% so as to avoid having to disclose his holdings, intentions, or methods in a Schedule 13D. Moreover, delaying the enforcement of the HSR Act until disclosures are required under the securities laws is irreconcilable with the Statement of Basis and Purpose which accompanied the Commission's new definition of "control" under Section 801.1(b)(l)(ii) of the Premerger Rules. See pp. 3-4 of our previous letter. It is just such a delay which will enable to carry out their plan to put in play through violations of the HSR Act.

Sincerely,



cbv

cc: Jeffrey I. Zuckerman, Esq. Director, Bureau of Competition

Barbara A. Clark, Esq.
Deputy Director for Mergers
and Acquisitions
Bureau of Competition