

803.2(c)(1)

[REDACTED]

[REDACTED]

December 28, 1988

VIA TELECOPY

Premarmer Notification Office  
Room 303  
Federal Trade Commission  
Washington, D.C. 20580

Attention: Mr. Patrick Sharpe

Gentlemen:

RECEIVED  
DEC 28 3 51 PM '88  
FEDERAL TRADE COMMISSION  
NOTIFICATION OFFICE

I am writing on behalf of a client of our firm to confirm the informal policy of the Federal Trade Commission staff (the "Staff") regarding an interpretation of the Hart-Scott-Rodino Act (the "Act") that was conveyed to me in a telephone conversation with Mr. Patrick Sharpe today. With respect to Rule 803.2(c)(1), which provides that the information called for by items 5, 7, 8 and 9 and the appendix to the Notification and Report Form "shall be supplied only with respect to operations conducted within the United States", I understand that sales by a foreign entity of goods manufactured abroad directly to United States purchasers without the assistance of any United States-based sales establishments do not arise "with respect to operations conducted within the United States".

Please call me (collect) at the above telephone number if the foregoing is in accordance with the present policies of the Staff. I further request that you maintain a copy of this letter in your files for future reference. Your assistance in this matter has been very much appreciated.

Sincerely,

[REDACTED]

[REDACTED]

cc:

[REDACTED]

OK, contacted  
Mr. [REDACTED] 12-28-88  
I concur with letter