

VIA TELECOPY

Victor Cohen, Esq.
Pre-Merger Notification Office
Federal Trade Commission
6th Street and Pennsylvania Avenue
Room 303
Washington, D.C. 20580

Dear Mr. Cohen:

This letter is to seek formal advice on the question I put to you earlier today in our telephone conversation.

Specifically, I seek advice as to how your office views the location of ocean going containers, owned by a

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foreign corporation, and which, while under lease to shipping companies, may be transitorily in the United States in the process of being loaded, unloaded or transshipped overland. The question is relevant to an analysis of a possible transaction under Section 802.50 of the Pre-Merger Notification Rules.

Thank you for your assistance. I would appreciate a response by telecopy.

