

Gillis, Diana L.

Subject: FW: 802.51 and Airlines

From: Gillis, Diana L. [mailto:dgillis@ftc.gov]

Sent: Thursday, February 05, 2015 4:21 PM

To: [REDACTED]

Cc: Walsh, Kathryn E.

Subject: RE: 802.51 and Airlines

First determine where the plane is registered. If registered in the US, it is a US asset. If foreign, you then look to revenues from flights either to or from the US, which would be considered US sales.

-Diana

From: [REDACTED]

Sent: Wednesday, January 28, 2015 9:41 AM

To: Gillis, Diana L.; Walsh, Kathryn E.

Subject: 802.51 and Airlines

In a deal involving an acquisition of a foreign airline, how do you determine their sales in or into the US? What methodology does one use?

[REDACTED]

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