

Haynes, Lanea

From: [REDACTED]
Sent: Friday, December 01, 2017 9:13 AM
To: Walsh, Kathryn E.; Berg, Karen E.; Carson, Timothy; Gillis, Diana L.; Shaffer, Kristin; Sheinberg, Samuel I.; Whitehead, Nora
Subject: FW: Item 6(c)

From: Whitehead, Nora
Sent: Friday, December 01, 2017 9:13:04 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Item 6(c)
Auto forwarded by a Rule

Confirmed.

Nora Whitehead
(202) 326-3262

From: HSRHelp
Sent: Thursday, November 30, 2017 3:23 PM
To: Walsh, Kathryn E.; Berg, Karen E.; Carson, Timothy; Gillis, Diana L.; Shaffer, Kristin; Sheinberg, Samuel I.; Whitehead, Nora
Subject: FW: Item 6(c)

From: [REDACTED]
Sent: Thursday, November 30, 2017 3:23:21 PM
To: [REDACTED]
Subject: Item 6(c)
Auto forwarded by a Rule

With respect to Item 6(c), can you confirm the advice provided in interpretations 1109021 and 1109007 – that identification of non-US minority interests is only required if that non-US entity earns revenue in the US (assuming an industry or NAICS code overlap) – is still the position of the PNO? <https://www.ftc.gov/enforcement/premerger-notification-program/informal-interpretations/1109021-0> and https://www.ftc.gov/sites/default/files/documents/informal_interpretations/1109007-informal-interpretation/1109007_0.pdf

Thank you,

[REDACTED]

[REDACTED]