

Sheinberg, Samuel I.

From: [REDACTED]
Sent: Thursday, September 06, 2018 3:20 PM
To: Walsh, Kathryn E.; Berg, Karen E.; Carson, Timothy; Sheinberg, Samuel I.; Whitehead, Nora
Subject: FW: 802.51

From: Shaffer, Kristin
Sent: Thursday, September 6, 2018 3:19:34 PM (UTC-05:00) Eastern Time (US & Canada)
To: [REDACTED]
Cc: HSRHelp
Subject: RE: 802.51

[REDACTED]

Our views are still consistent with Interpretation #151 in the latest edition of the Premerger Notification Practice Manual.

Best regards,
Kristin

Kristin Shaffer
Attorney
Premerger Notification Office
Federal Trade Commission
202-326-3434 | kshaffer@ftc.gov

From: [REDACTED]
Sent: Thursday, September 06, 2018 10:36 AM
To: [REDACTED]
Subject: 802.51

Dear HSR Team:

Are intercompany sales between or among the foreign parent and its U.S. subs or affiliates included in the total sales “in or into the United States” under 802.51? I have a foggy memory that the PNO view on this issue might have changed, but I cannot find a clear statement or anything in our notes here.

Thank you for your assistance.

[REDACTED]

[REDACTED]

[REDACTED]



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