## Sheinberg, Samuel I.

From:

Tuesday, August 13, 2019 2:08 PM

Sent: To:

Walsh, Kathryn E.; Berg, Karen E.; Carson, Timothy; Sheinberg, Samuel I.; Whitehead,

Nora; Olson, Eric

**Subject:** 

FW: 802.50 / 802.51

From: Six, Anne

Sent: Tuesday, August 13, 2019 2:07:49 PM (UTC-05:00) Eastern Time (US & Canada)

To:

Cc:

Subject: FW: 802.50 / 802.51

"Sales" means annual net sales for purposes of 802.50 and 802.51.

Best,

Anne

## Anne K. Six

**Attorney** 

Premerger Notification Office Federal Trade Commission 202-326-2799 | asix@ftc.gov



From:

Sent: Thursday, August 8, 2019 1:28:25 PM (UTC-05:00) Eastern Time (US & Canada)

IO:

Subject: 802.50 / 802.51

## Good afternoon -

I would appreciate clarification on the following: does "sales" as used in 802.50 and 802.51 refer to net sales or gross sales? The question presented in Informal Interpretation 1506005 appears to have assumed the meaning of "sales" in 802.50 and 802.51 tracks 802.11(c), in which case it would be "net sales," but the distinction between net and gross was not squarely addressed in the response. Thank you.



