## Sheinberg, Samuel I.

From:

Wednesday, April 7, 2021 10:37 AM

Sent: To:

Walsh, Kathryn E.; Sheinberg, Samuel I.; Six, Anne; Whitehead, Nora; Musick, Vesselina

Subject:

FW: HSR Informal Interpretation

From: Berg, Karen E. <KBERG@ftc.gov>

Sent: Wednesday, April 7, 2021 10:36:34 AM (UTC-05:00) Eastern Time (US & Canada)

To:

Cc:

Subject: RE: HSR Informal Interpretation

Report in Item 5a revenues from services rendered in the US, as well as revenues from any US establishment that booked those services. Report the entire year's revenues for the entity acquired in 2020.

From:

Sent: Wednesday, April 7, 2021 9:59:58 AM (UTC-05:00) Eastern Time (US & Canada)

To:

**Subject:** HSR Informal Interpretation

Good morning, please consider this a request for an informal interpretation:

Two questions related to item 5(a) revenues:

Are US operations deemed to be revenues from sales to customers <u>located</u> in the U.S., or from services <u>rendered</u> in the U.S. but to customers located outside the U.S.?

If an entity was acquired in 2020 (and will be one of the acquired entities in this transaction), do we include the entire year's revenues this entity or only revenues that period of time post acquisition when it was controlled by the UPE?



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