

Rule 802.1(b)

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Material may be submitted to the Commission in confidence if the information which restricts release under the Freedom of Information Act

November 8, 1990

BY MESSENGER

Richard B. Smith, Esq.
Premerger Notification Office
Bureau of Competition
Room 305
Federal Trade Commission
Sixth and Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Hart-Scott-Rodino: Conveyance of Land Exclusive of Improvements

Dear Dick:

This letter will confirm our telephone conversation of yesterday in which you related to me that based on the facts set forth in my letter to you of November 6, 1990, and prior interpretations rendered by the FTC Staff concerning conveyances of fee simple interests in land exclusive of the improvements thereon, the transaction described in my letter is exempt from the reporting requirements of the Hart-Scott-Rodino Act.

I very much appreciate your interest and prompt attention in this matter.

Very truly yours,

[REDACTED]

cc: [REDACTED]