

[REDACTED]

This document contains information the confidentiality of which restricts release under the Freedom of Information Act

December 5, 1990

Ms. Nancy Ovuka
Compliance Analyst
Pre-Merger Notification Office
H-303
Federal Trade Commission
Washington, D.C. 20580

Re: **Applicability of Hart-Scott-Rodino Antitrust Improvements Act of 1976 to** [REDACTED]

Dear Ms. Ovuka:

Thank you for all your time and assistance you gave me with respect to whether the Hart-Scott-Rodino Antitrust Improvements Act of 1976 (the "Act") and the Regulations promulgated pursuant to the Act (the "Regulations") are applicable to the [REDACTED]

You have informed me that the Federal Trade Commission does not issue written opinions on these matters. Accordingly, I am writing this letter to confirm our telephone conversation that, based on the documentation and information provided to you (the City Charter of the City of [REDACTED] wherein the [REDACTED] was established, and the statutes of the State of [REDACTED] with respect to providing the [REDACTED] of the City of [REDACTED] the status of a political subdivision of the State of [REDACTED] for purposes of governmental immunity and the [REDACTED] Open Meetings Act), the FTC has concurred in our opinion that the Act is not applicable to the [REDACTED] because it is not included within the definition of "entity" set forth in the Regulations at 16 CFR 801.1(a)(2). Consequently, you have indicated you do not expect the [REDACTED] of the City of [REDACTED] to apply to the FTC for a determination under the Act.

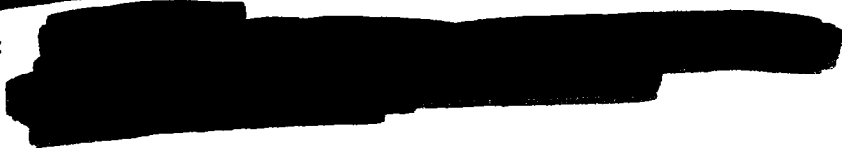
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Again, thank you for your prompt consideration and guidance in response to our inquiries.

Sincerely,

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cc:

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