

1501.01

[REDACTED]

[REDACTED]

[REDACTED]

January 22, 1992

By Messenger

Mr. Thomas F. Hancock
Federal Trade Commission
Premerger Notification Office
Bureau of Competition, Room 301
6th Street & Pennsylvania Avenue, N.W.
Washington, D.C. 20580

This material may be subject to the confidentiality provision of Section 7A (b) of the Act which requires

JAN 21 1992

Dear Mr. Hancock:

On March 6, 1991, you advised me that, in certain circumstances, the acquisition of an [REDACTED] payment that is "[REDACTED]" in [REDACTED] rather than [REDACTED] will be exempt from the premerger notification requirements of the Hart-Scott-Rodino Antitrust Improvements Act of 1976, as amended (the "Act"), as the acquisition of "goods . . . in the ordinary course of business" under Section 7A(c)(1) of the Act. I confirmed our telephone conversation in a letter of March 8, 1991 (the "Prior Letter"), a copy of which is attached hereto.

The purpose of this letter is to confirm our telephone conversation of January 21, 1992, in which you advised me that the acquisition by entities within the Acquiring Person described in the Prior Letter of [REDACTED] payments that are [REDACTED] in [REDACTED] will also be exempt from the premerger notification requirements of the Act as the acquisition of "goods . . . in the ordinary course of business" under Section 7A(c)(1) of the Act. As in the Prior Letter, it is contemplated that such [REDACTED] payments will burden [REDACTED] leases that are currently [REDACTED]

Please call me immediately at [REDACTED] should the position of the Federal Trade Commission staff with regard to this matter be different from that set forth above.

Mr. Thomas F. Hancock
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In addition, please retain this letter in your files. I appreciate very much your assistance and helpful advice in this matter.

Very truly yours,

A large black rectangular redaction covering the signature and name of the sender.

1/23/92

1/23/92

OK

Ch

~~JFH~~

JFH