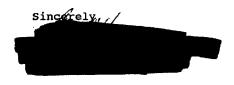
401.40 July 1, 1992

Patrick Sharpe Premerger Notification Office Bureau of Competition Room 303 Federal Trade Commission 6th Street and Pennsylvania Avenue, N.W. Washington, D.C. 20580

Dear Mr. Sharpe:

Mr. Sharpe:

This letter confirms our telephone discussion of June 30, 1992. During said discussion, I inquired into the meaning of Hart-Scott-Rodino Report Item 9 as applied to reporting the formation of a joint venture. Specifically, I asked you whether a joint venturer, in response to Item 9, must report acquisitions of entities which derive revenue in a 4-digit industry listed in the response to Item 7(a) if the proposed joint venture is not reasonably expected to derive revenue in that industry. answered in the negative.



I concur (PS) See fractice manual #321 + 5BP 43 Fedhey
33532 (1974)

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